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tcrabb@radeylaw.com

July 5, 2022

VIA Electronic Filing to the Office of Commission Clerk
Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20220063-WS - Application for transfer of water and wastewater facilities of Tradewinds Utilities, Inc., water Certificate No. 405-W, and wastewater Certificate No. 342-S to CSWR-Florida Utility Operating Company, LLC, in Marion County.

Dear Commission Clerk:

With this cover letter, CSWR-Florida Utility Operating Company, LLC files a redacted copy of the Wastewater Facility Report (attached as Exhibit 1) and the Water Facility Report (attached as Exhibit 2) supplementing Exhibit H of its Application. These reports are filed in redacted form pursuant to the Request for Confidential Classification filed by CSWR-Florida. A highlighted copy of each report will be hand delivered to the Clerk's office.

Thank you for the opportunity to submit additional information in support of the application.

Sincerely,
/s/ Thomas A. Crabb
Thomas A. Crabb
Susan F. Clark
Attorneys for Applicant
CSWR-Florida Utility Operating Company, LLC

cc: Mary Wessling, Esq., Office of Public Counsel (wessling.mary@leg.state.fl.us)
Charles deMenzes (charlie@altfo.com)

EXHIBIT 1

WASTEWATER FACILITY REPORT
TRADEWINDS UTILITIES, INC.

LOCATION:
MARION COUNTY, FLORIDA

PREPARED FOR:
Central States Water Resources
500 Northwest Plaza Dr., Suite 500
St. Ann, MO 63074

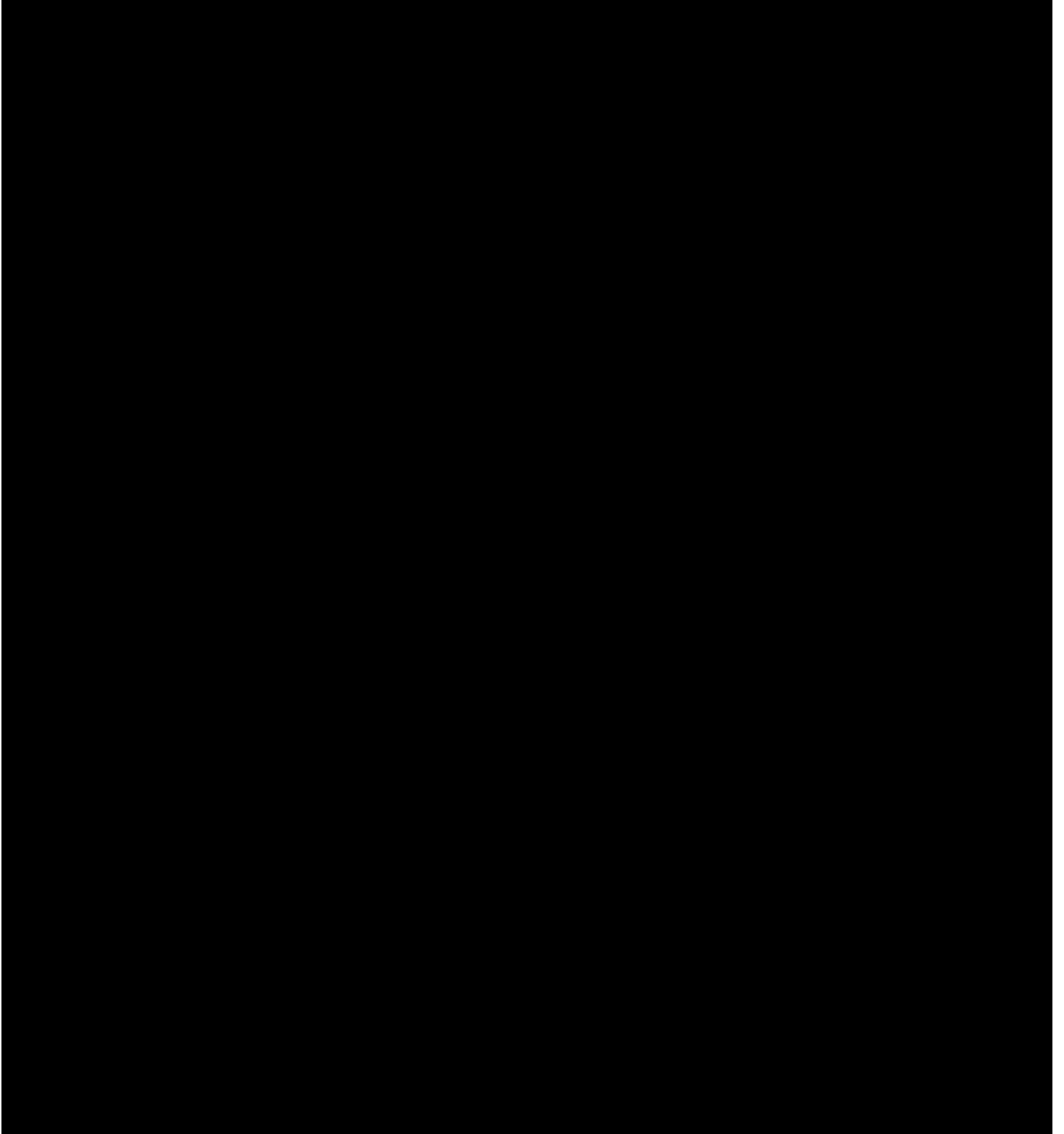
DATE:
March 2022

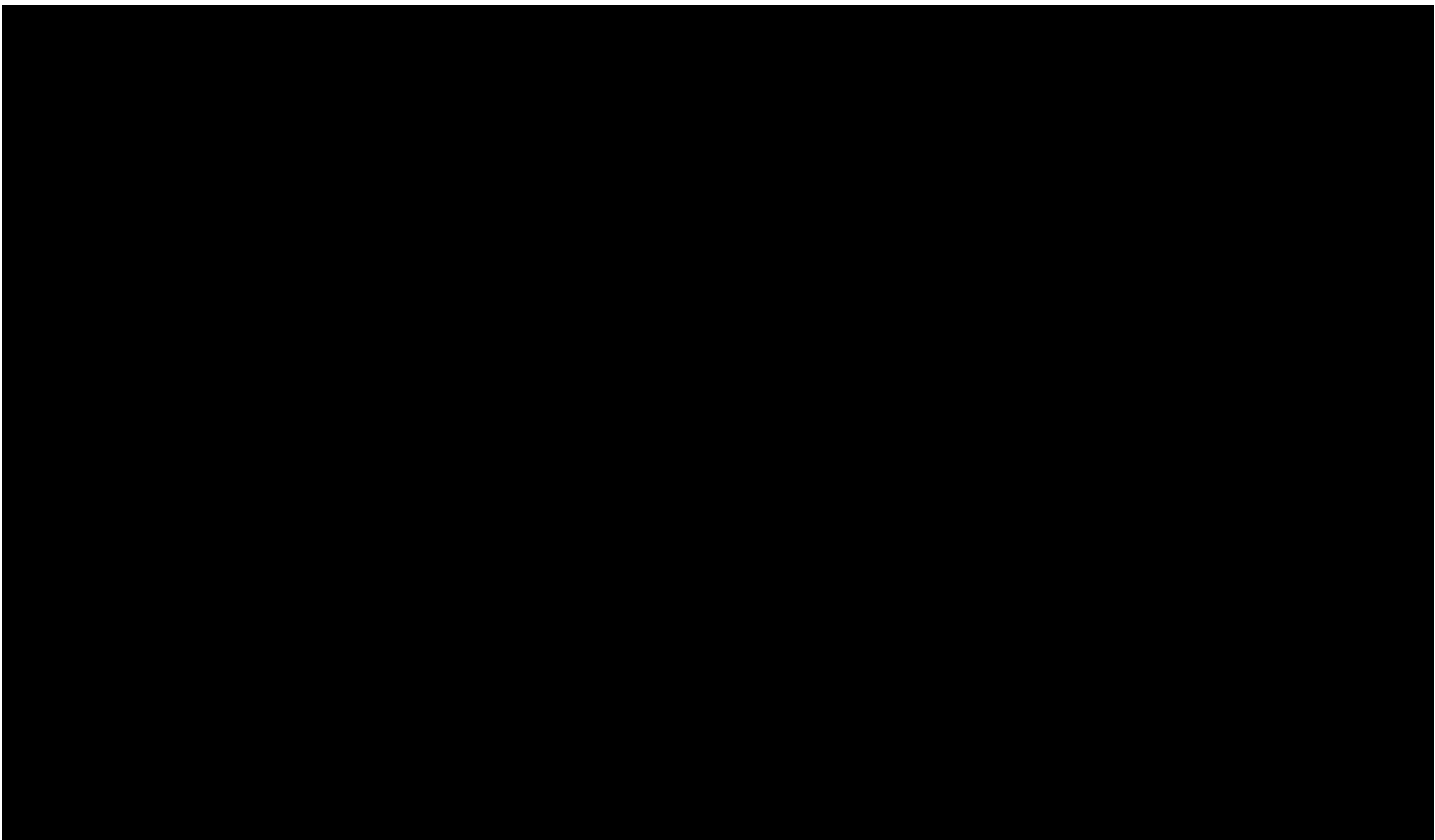


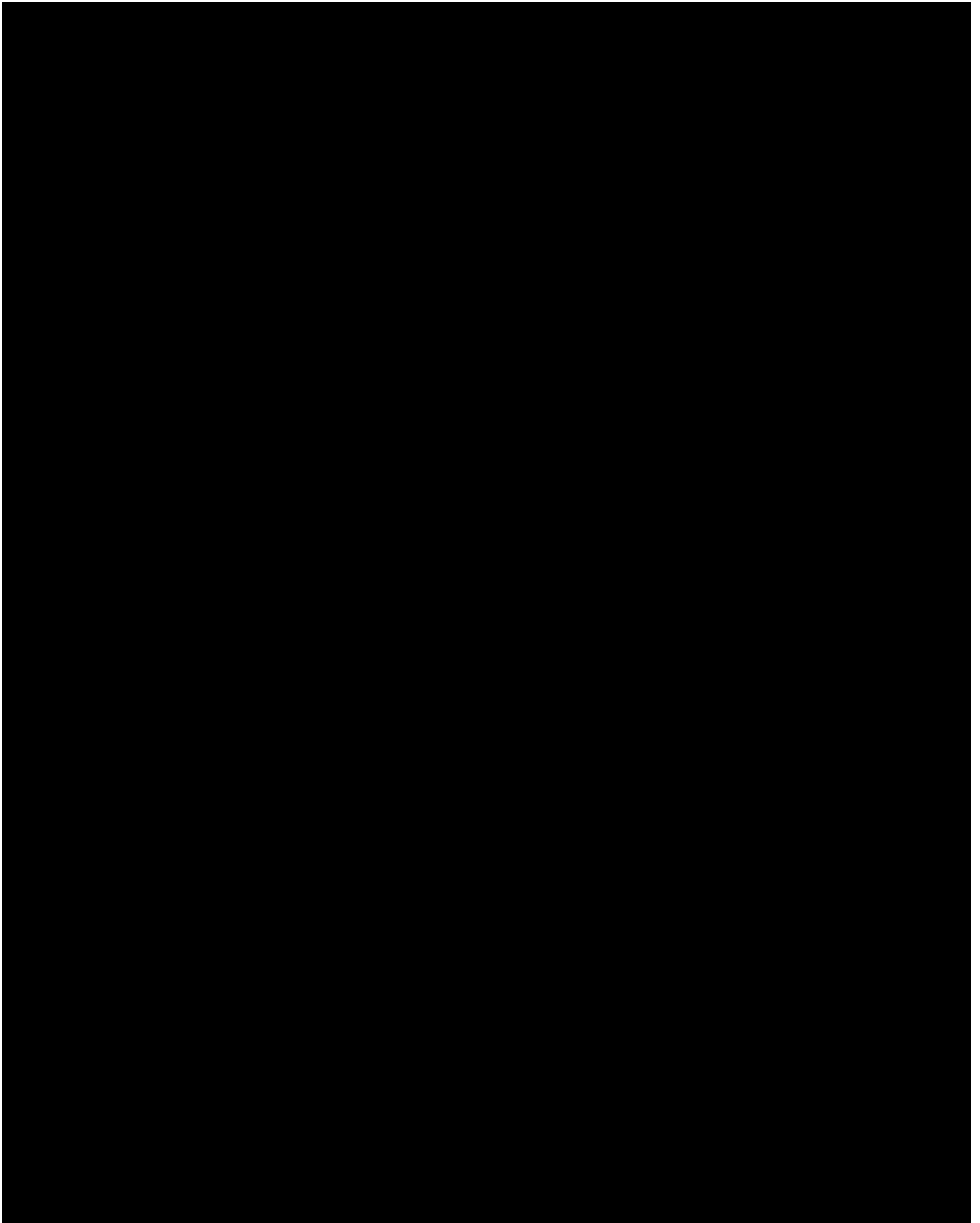
PREPARED BY:
Clearpoint
CONSULTING ENGINEERS, P.A.

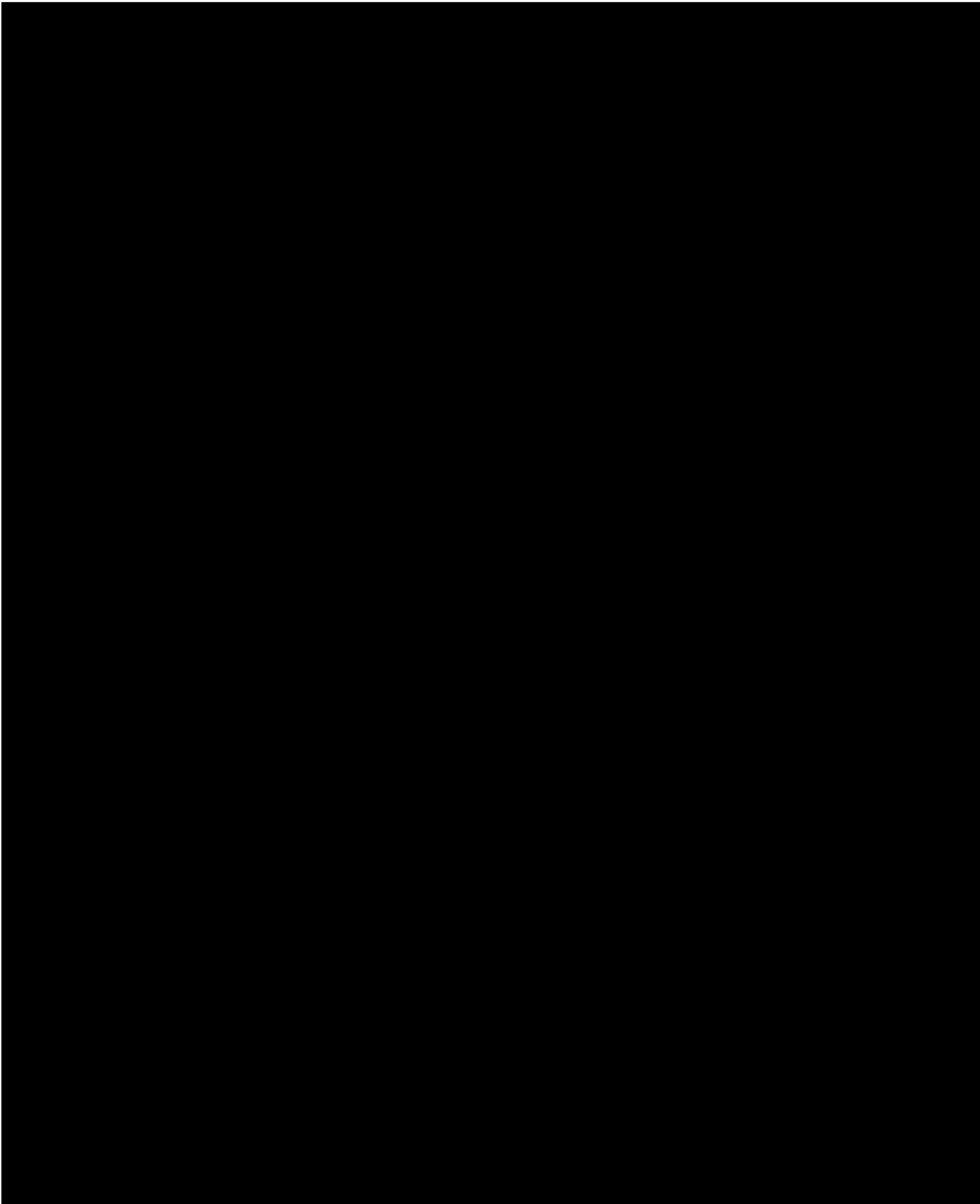
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Hattiesburg, MS 39402

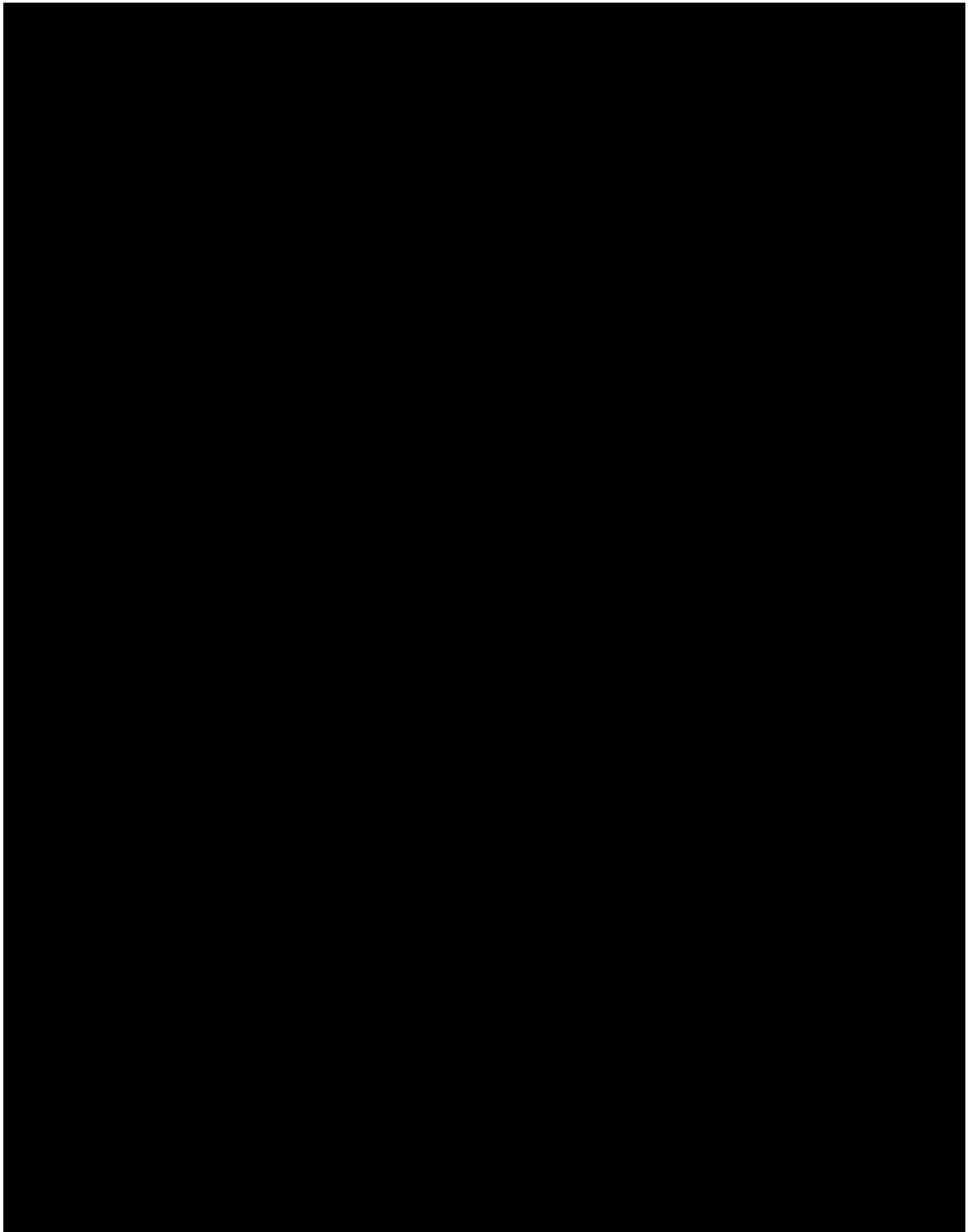
ENGINEERING MEMO
TRADEWINDS WWTF
MARION COUNTY, FL
MARCH 2022

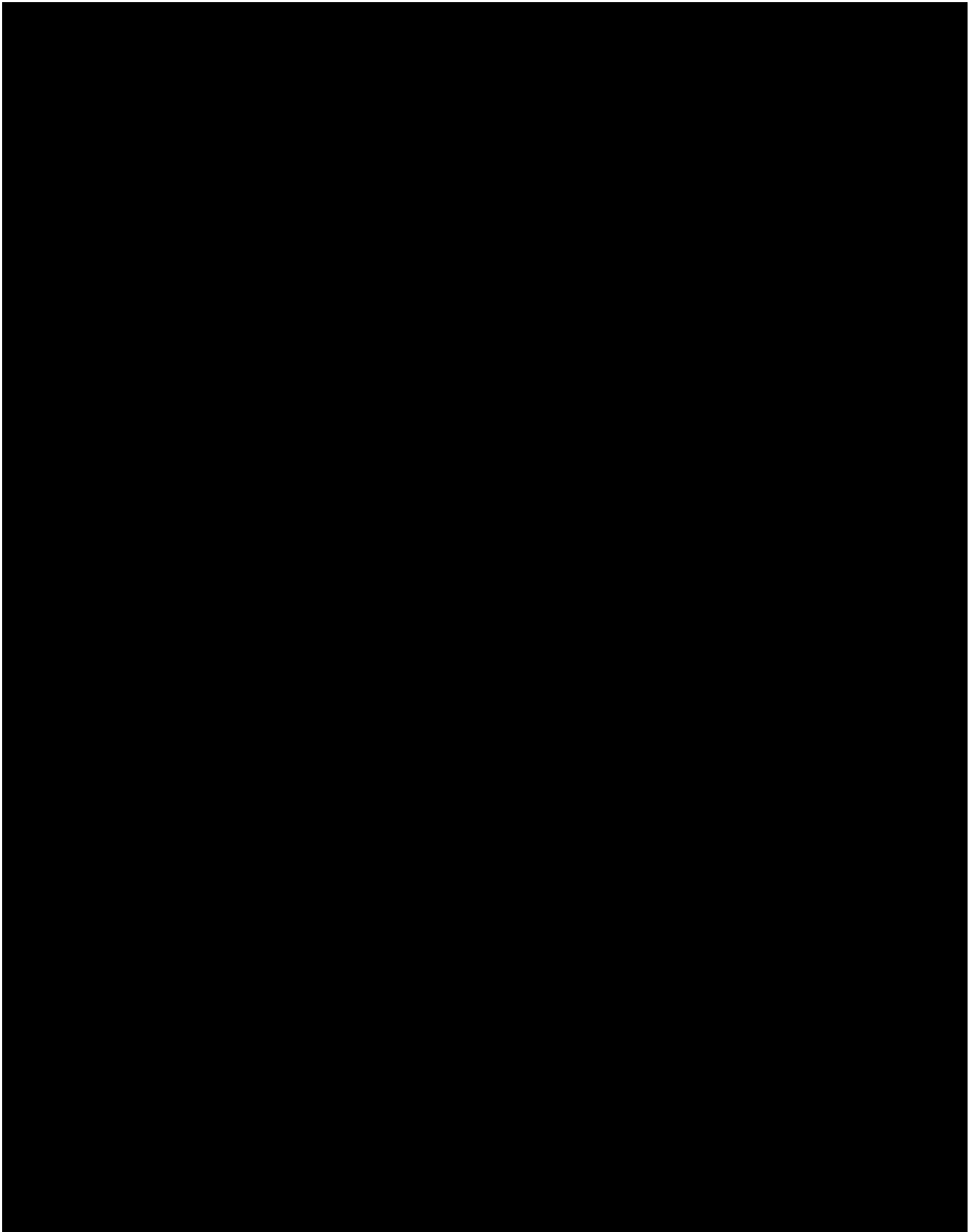


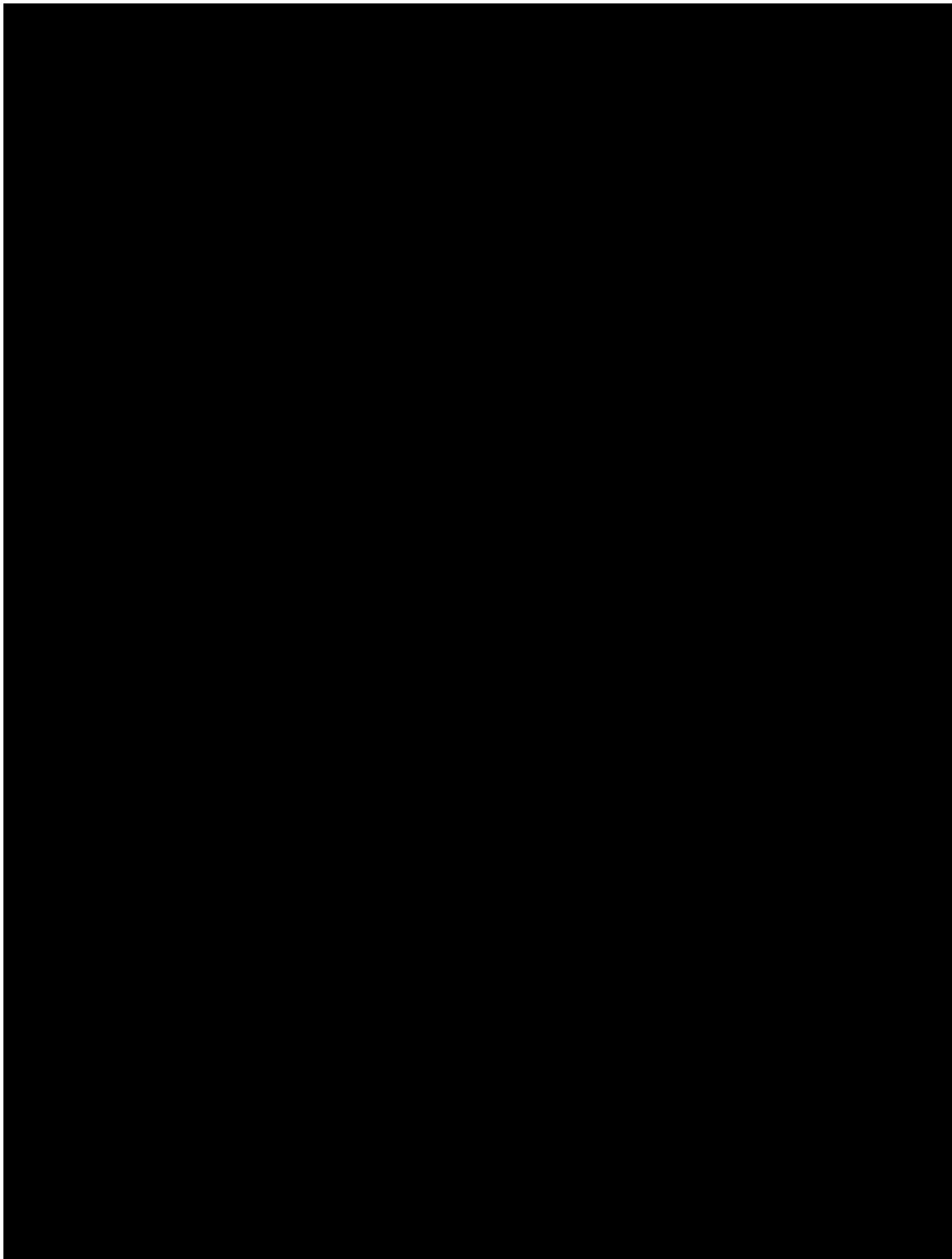


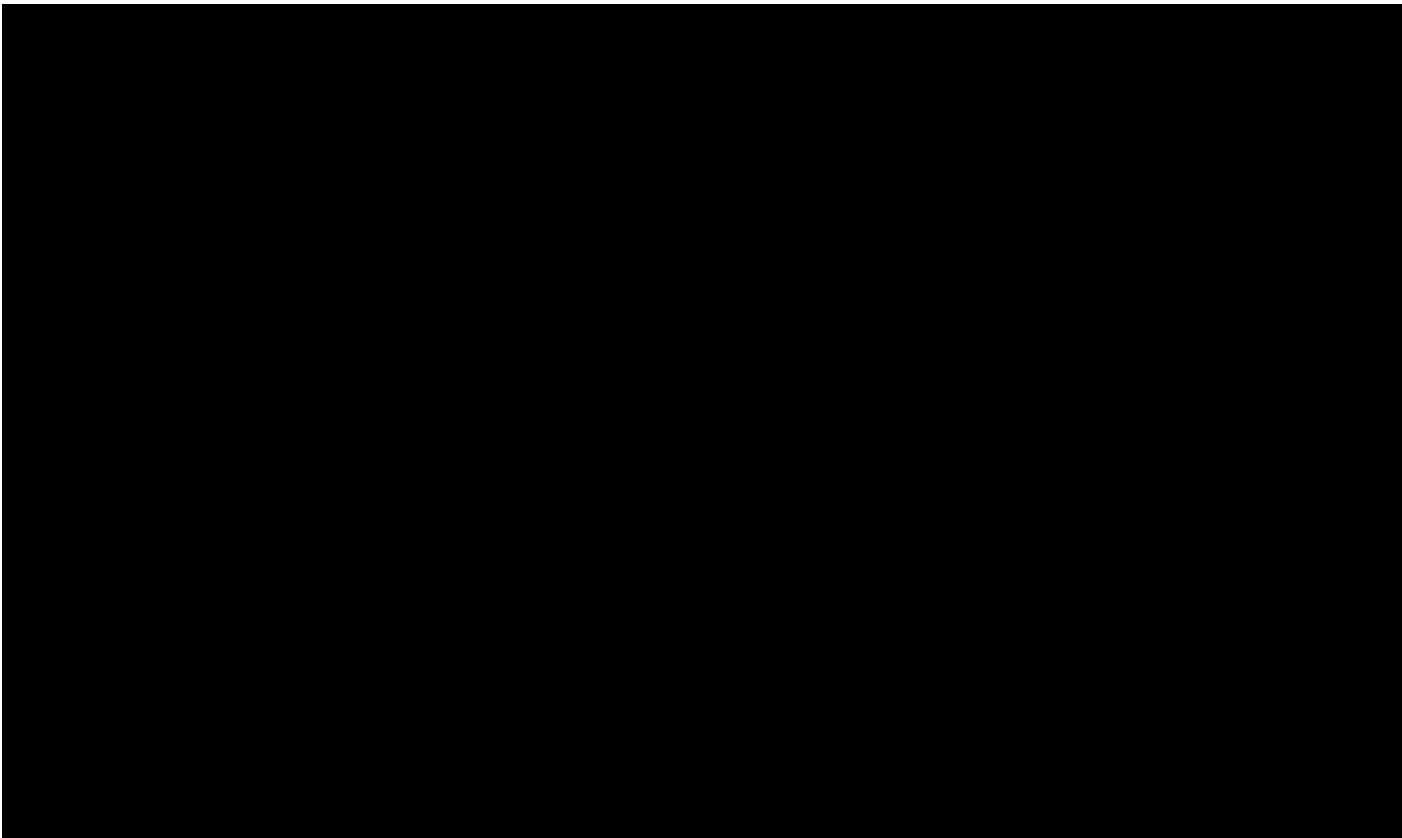


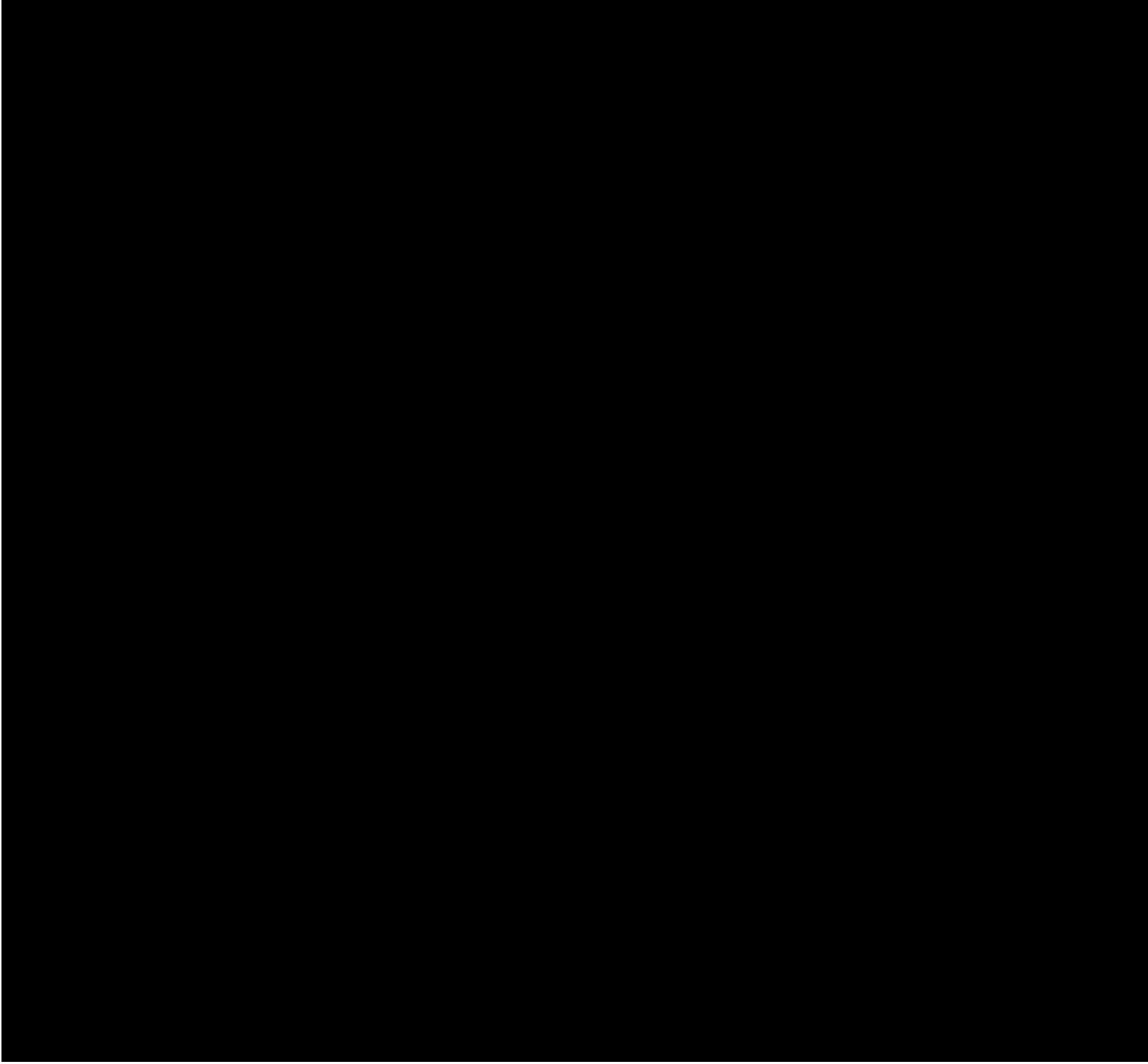












SUPPORTING DOCUMENTATION TO
WASTEWATER ENGINEERING MEMO
TRADEWINDS UTILITIES, INC.

LOCATION:
MARION COUNTY, FLORIDA

PREPARED FOR:
Central States Water Resources
500 Northwest Plaza Dr., Suite 500
St. Ann, MO 63074

DATE:
March 2022



PREPARED BY:
Clearpoint
CONSULTING ENGINEERS, P.A.

6652 U.S. Highway 98
Hattiesburg, MS 39402

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ATTACHMENTS

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Attachment F – Wastewater Facility Photos

ATTACHMENT A
Wastewater Permit Information



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

NOTICE OF PERMIT ISSUANCE

Charles DeMenzes, President
Tradewinds Utilities Inc
P O Box 5220
Ocala, Florida 34478
utilitiesmanagementteam@gmail.com

Marion County - DW
Tradewinds WWTF

Enclosed is Permit Number FLA010699-004 to operate a domestic wastewater facility issued under Section(s) 403.087 and 403.0885 of the Florida Statutes.

Monitoring requirements under this permit are effective on February 1, 2016. Until such time, the permittee shall continue to monitor and report in accordance with previously effective permit requirements, if any.

The Department's proposed agency action shall become final unless a timely petition for an administrative hearing is filed under sections 120.569 and 120.57 of the Florida Statutes before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received by the clerk) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

Petitions by the applicant or any of the parties listed below must be filed within fourteen days of receipt of this written notice. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the notice or within fourteen days of receipt of the written notice, whichever occurs first.

Under section 120.60(3) of the Florida Statutes, however, any person who has asked the Department for notice of agency action may file a petition within fourteen days of receipt of such notice, regardless of the date of publication.

The petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 of the Florida Statutes. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any; the Department permit identification number and the county in which the subject matter or activity is located;
- (b) A statement of how and when each petitioner received notice of the Department action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A statement of facts that the petitioner contends warrant reversal or modification of the Department action;
- (f) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take.

A petition that does not dispute the material facts on which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573 of the Florida Statutes is not available for this proceeding.

This action is final on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above. Upon the timely filing of a petition this order will not be effective until further order of the Department.

Any party to the order has the right to seek judicial review of the order under section 120.68 of the Florida Statutes, by the filing of a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the Clerk of the Department in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000; and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice of appeal must be filed within 30 days from the date when the final order is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Christianne C. Ferraro, P.E.

Administrator

Permitting and Waste Cleanup Program - Wastewater

3319 Maguire Boulevard, Suite 232

Orlando, Florida 32803-3767

Filed, on this date, pursuant to Section 120.52, F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.



Clerk

November 23, 2015

Date

CCF/wgb/cs

Enclosures: Permit, DMR and SOB

Copies furnished to:

Miles C. Anderson, P.E. (via email: miles.anderson@mca-engineers.com)

Marion County Dept. of Health (via email: Daniel.Dooley@FlHealth.gov)

David Smicherko, DEP (via email)

Danielle Bentzen, DEP (via email)

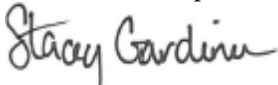
Mary Ann Kraus, DEP (via email)

Shabbir Rizvi, DEP (via email)

Wilmott Brown, DEP (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before close of

business on November 23, 2015 to the listed persons, by .



Florida Department of Environmental Protection

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

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

STATE OF FLORIDA DOMESTIC WASTEWATER FACILITY PERMIT

PERMITTEE:
Tradewinds Utilities Inc

RESPONSIBLE OFFICIAL:
Mr. Charles Demenzes
PO Box 5220
Ocala, Florida 34478-5220
(352) 622-4949

PERMIT NUMBER: FLA010699
FILE NUMBER: FLA010699-004-DW3P
EFFECTIVE DATE: December 22, 2015
EXPIRATION DATE: December 21, 2020

FACILITY:

Tradewinds WWTF
2925 NE 43rd Pl
Ocala, FL 34479-8842
Marion County
Latitude: 29°13' 54.37" N Longitude: 82°5' 48.28" W

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and applicable rules of the Florida Administrative Code (F.A.C.). This permit does not constitute authorization to discharge wastewater other than as expressly stated in this permit. The above named permittee is hereby authorized to operate the facilities in accordance with the documents attached hereto and specifically described as follows:

WASTEWATER TREATMENT:

An existing 0.081 million gallon day (mgd) annual average daily flow (AADF) permitted capacity extended aeration domestic wastewater treatment plant (a 0.065 mgd plant in parallel with a 0.050 mgd plant) consisting of flow equalization, aeration, secondary clarification, chlorination, and aerobic digestion of biosolids.

REUSE OR DISPOSAL:

Land Application R-001: An existing 0.081 MGD annual average daily flow permitted capacity slow-rate restricted public access reuse system. R-001 consists of a three-day clay-lined holding pond and a 2.34 acre sprayfield located approximately at latitude 29°13' 59" N, longitude 82°5' 45" W.

IN ACCORDANCE WITH: The limitations, monitoring requirements, and other conditions set forth in this cover sheet and Part I through Part IX on pages 1 through 16 of this permit.

PERMITTEE: Tradewinds Utilities Inc
 FACILITY: Tradewinds WWTF

PERMIT NUMBER: FLA010699
 EXPIRATION DATE: December 21, 2020

I. RECLAIMED WATER AND EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

A. Reuse and Land Application Systems

1. During the period beginning on the effective date and lasting through the expiration date of this permit, the permittee is authorized to direct reclaimed water to Reuse System R-001. Such reclaimed water shall be limited and monitored by the permittee as specified below and reported in accordance with Permit Condition I.B.7.:

Parameter	Units	Max./Min	Reclaimed Water Limitations		Monitoring Requirements			Notes
			Limit	Statistical Basis	Frequency of Analysis	Sample Type	Monitoring Site Number	
Flow (Effluent)	MGD	Max Max	0.081 Report	Annual Average Monthly Average	5 Days/Week	Recording Flow Meter with Totalizer	FLW-1	See I.A.3
BOD, Carbonaceous 5 day, 20C	mg/L	Max Max Max Max	20.0 30.0 45.0 60.0	Annual Average Monthly Average Weekly Average Single Sample	Monthly	Grab	EFA-1	
Solids, Total Suspended	mg/L	Max Max Max Max	20.0 30.0 45.0 60.0	Annual Average Monthly Average Weekly Average Single Sample	Monthly	Grab	EFA-1	
Coliform, Fecal	#/100mL	Max Max Max	200 200 800	Monthly Geometric Mean Annual Average Single Sample	Monthly	Grab	EFA-1	See I.A.4
pH	s.u.	Min Max	6.0 8.5	Single Sample Single Sample	5 Days/Week	Grab	EFA-1	
Chlorine, Total Residual (For Disinfection)	mg/L	Min	0.5	Single Sample	5 Days/Week	Grab	EFA-1	See I.A.5
Nitrogen, Nitrate, Total (as N)	mg/L	Max	12.0	Annual Average	Annually	Grab	EFA-1	See I.A.6
Nitrogen, Total	mg/L	Max Max	Report Report	Annual Average Monthly Average	Monthly	Grab	EFA-1	See I.A.7
Phosphorus, Total (as P)	mg/L	Max Max	Report Report	Annual Average Monthly Average	Monthly	Grab	EFA-1	See I.A.7

PERMITTEE: Tradewinds Utilities Inc
FACILITY: Tradewinds WWTF

PERMIT NUMBER: FLA010699
EXPIRATION DATE: December 21, 2020

2. Reclaimed water samples shall be taken at the monitoring site locations listed in Permit Condition I.A.1. and as described below:

Monitoring Site Number	Description of Monitoring Site
FLW-1	Effluent flow meter and triangular weir
EFA-1	Chlorine contact chamber effluent

3. A recording flow meter with totalizer shall be utilized to measure flow and calibrated at least once every 12 months. *[62-601.200(17) and .500(6)]*
4. The effluent limitation for the monthly geometric mean for fecal coliform is only applicable if 10 or more values are reported. If fewer than 10 values are reported, the monthly geometric mean shall be calculated and reported on the Discharge Monitoring Report to be used to calculate the annual average. *[62-600.440(4)(c)]*
5. Total residual chlorine must be maintained for a minimum contact time of 15 minutes based on peak hourly flow. *[62-610.410, 600.440(4)(b) and (5)(b)]*
6. Nitrate nitrogen (NO₃) concentration in the water discharged to the land application system shall not exceed 12.0 mg/L or as required to comply with Rule 62-610.510, F.A.C. *[62-610.510]*
7. Monitoring for total nitrogen (TN) and total phosphorus (TP) are required, as allowed by Rule 62-601.300(6), FAC, to evaluate impacts of reclaimed water to ground and surface waters in an impaired water basin. *[62-601.300(6)]*

PERMITTEE: Tradewinds Utilities Inc
 FACILITY: Tradewinds WWTF

PERMIT NUMBER: FLA010699
 EXPIRATION DATE: December 21, 2020

B. Other Limitations and Monitoring and Reporting Requirements

1. During the period beginning on the effective date and lasting through the expiration date of this permit, the treatment facility shall be limited and monitored by the permittee as specified below and reported in accordance with condition I.B.7.:

Parameter	Units	Max/Min	Limitations		Monitoring Requirements			Notes
			Limit	Statistical Basis	Frequency of Analysis	Sample Type	Monitoring Site Number	
Flow (Total through the plant)	MGD	Max Max Max	0.081 Report Report	Annual Average Monthly Average Quarterly Average	5 Days/Week	Recording Flow Meter with Totalizer	FLW-1	See I.B.4
Percent Capacity, (TMADF/Permitted Capacity) x 100	percent	Max	Report	Monthly Average	Monthly	Calculated	CAL-1	
BOD, Carbonaceous 5 day, 20C (Influent)	mg/L	Max	Report	Single Sample	Annually	Grab	INF-1	See I.B.3
Solids, Total Suspended (Influent)	mg/L	Max	Report	Single Sample	Annually	Grab	INF-1	See I.B.3

PERMITTEE: Tradewinds Utilities Inc
FACILITY: Tradewinds WWTF

PERMIT NUMBER: FLA010699
EXPIRATION DATE: December 21, 2020

2. Samples shall be taken at the monitoring site locations listed in Permit Condition I.B.1. and as described below:

Monitoring Site Number	Description of Monitoring Site
FLW-1	Effluent flow meter and triangular weir
CAL-1	Calculated
INF-1	Raw influent to surge tank

3. Influent samples shall be collected so that they do not contain digester supernatant or return activated sludge, or any other plant process recycled waters. [62-601.500(4)]
4. A recording flow meter with totalizer shall be utilized to measure flow and calibrated at least once every 12 months. [62-601.200(17) and .500(6)]
5. The sample collection, analytical test methods and method detection limits (MDLs) applicable to this permit shall be conducted using a sufficiently sensitive method to ensure compliance with applicable water quality standards and effluent limitations and shall be in accordance with Rule 62-4.246, Chapters 62-160 and 62-601, F.A.C., and 40 CFR 136, as appropriate. The list of Department established analytical methods, and corresponding MDLs (method detection limits) and PQLs (practical quantitation limits), which is titled "FAC 62-4 MDL/PQL Table (April 26, 2006)" is available at <http://www.dep.state.fl.us/labs/library/index.htm>. The MDLs and PQLs as described in this list shall constitute the minimum acceptable MDL/PQL values and the Department shall not accept results for which the laboratory's MDLs or PQLs are greater than those described above unless alternate MDLs and/or PQLs have been specifically approved by the Department for this permit. Any method included in the list may be used for reporting as long as it meets the following requirements:
- a. The laboratory's reported MDL and PQL values for the particular method must be equal or less than the corresponding method values specified in the Department's approved MDL and PQL list;
 - b. The laboratory reported MDL for the specific parameter is less than or equal to the permit limit or the applicable water quality criteria, if any, stated in Chapter 62-302, F.A.C. Parameters that are listed as "report only" in the permit shall use methods that provide an MDL, which is equal to or less than the applicable water quality criteria stated in 62-302, F.A.C.; and
 - c. If the MDLs for all methods available in the approved list are above the stated permit limit or applicable water quality criteria for that parameter, then the method with the lowest stated MDL shall be used.

When the analytical results are below method detection or practical quantitation limits, the permittee shall report the actual laboratory MDL and/or PQL values for the analyses that were performed following the instructions on the applicable discharge monitoring report.

Where necessary, the permittee may request approval of alternate methods or for alternative MDLs or PQLs for any approved analytical method. Approval of alternate laboratory MDLs or PQLs are not necessary if the laboratory reported MDLs and PQLs are less than or equal to the permit limit or the applicable water quality criteria, if any, stated in Chapter 62-302, F.A.C. Approval of an analytical method not included in the above-referenced list is not necessary if the analytical method is approved in accordance with 40 CFR 136 or deemed acceptable by the Department. [62-4.246, 62-160]

6. The permittee shall provide safe access points for obtaining representative influent, reclaimed water, and effluent samples which are required by this permit. [62-601.500(5)]
7. **Monitoring requirements under this permit are effective on February 1, 2016.** Until such time, the permittee shall continue to monitor and report in accordance with previously effective permit requirements, if any. During the period of operation authorized by this permit, the permittee shall complete and submit to the Department Discharge Monitoring Reports (DMRs) in accordance with the frequencies specified by the REPORT type (i.e. monthly, quarterly, semiannual, annual, etc.) indicated on the DMR forms attached to this permit. Unless specified otherwise in this permit, monitoring results for each monitoring period shall be submitted in accordance with the associated DMR due dates below. DMRs shall be submitted for each required monitoring period including periods of no discharge.

PERMITTEE: Tradewinds Utilities Inc
 FACILITY: Tradewinds WWTF

PERMIT NUMBER: FLA010699
 EXPIRATION DATE: December 21, 2020

REPORT Type on DMR	Monitoring Period	Mail or Electronically Submit by
Monthly	first day of month - last day of month	28 th day of following month
Quarterly	January 1 - March 31 April 1 - June 30 July 1 - September 30 October 1 - December 31	April 28 July 28 October 28 January 28
Semiannual	January 1 - June 30 July 1 - December 31	July 28 January 28
Annual	January 1 - December 31	January 28

The permittee may submit either paper or electronic DMR forms. If submitting paper DMR forms, the permittee shall make copies of the attached DMR forms, without altering the original format or content unless approved by the Department, and shall mail the completed DMR forms to the Department's Central District Office at the address specified in Permit Condition I.B.8. by the twenty-eighth (28th) of the month following the month of operation.

When submitting electronic DMR forms (**preferred**), the permittee shall use the Department's electronic DMR system (EzDMR) and shall electronically submit the completed DMR forms to the Department by the twenty-eighth (28th) of the month following the month of operation. Data submitted in electronic format is equivalent to data submitted on signed and certified paper DMR forms.

[62-620.610(18)][62-601.300(1),(2), and (3)]

- Unless specified otherwise in this permit, all reports and other information required by this permit, including 24-hour notifications, shall be submitted to or reported to, as appropriate, the Department's Central District Office at the address specified below:

Florida Department of Environmental Protection
 Central District Office
 3319 Maguire Blvd
 Suite 232
 Orlando, Florida 32803-3767

Phone Number - (407)897-4100
 FAX Number - (850)412-0467
 (All FAX copies and e-mails shall be followed by original copies.)

[62-620.305]

- All reports and other information shall be signed in accordance with the requirements of Rule 62-620.305, F.A.C. *[62-620.305]*

II. BIOSOLIDS MANAGEMENT REQUIREMENTS

A. Basic Requirements

- Biosolids generated by this facility may be transferred to 412 Biosolids or disposed of in a Class I solid waste landfill. Transferring biosolids to an alternative biosolids treatment facility does not require a permit modification. However, use of an alternative biosolids treatment facility requires submittal of a copy of the agreement pursuant to Rule 62-640.880(1)(c), F.A.C., along with a written notification to the Department at least 30 days before transport of the biosolids. *[62-620.320(6), 62-640.880(1)]*
- The permittee shall monitor and keep records of the quantities of biosolids generated, received from source facilities, treated, distributed and marketed, land applied, used as a biofuel or for bioenergy, transferred to another facility, or landfilled. These records shall be kept for a minimum of five years. *[62-640.650(4)(a)]*
- Biosolids quantities shall be monitored by the permittee as specified below. Results shall be reported on the permittee's Discharge Monitoring Report for Monitoring Group RMP-Q in accordance with Condition I.B.7.

PERMITTEE: Tradewinds Utilities Inc
 FACILITY: Tradewinds WWTF

PERMIT NUMBER: FLA010699
 EXPIRATION DATE: December 21, 2020

Parameter	Units	Max/Min	Biosolids Limitations		Monitoring Requirements		
			Limit	Statistical Basis	Frequency of Analysis	Sample Type	Monitoring Site Number
Biosolids Quantity (Transferred)	dry tons	Max	Report	Monthly Total	Monthly	Calculated	RMP-1
Biosolids Quantity (Landfilled)	dry tons	Max	Report	Monthly Total	Monthly	Calculated	RMP-1

[62-640.650(5)(a)1]

4. Biosolids quantities shall be calculated as listed in Permit Condition II.3 and as described below:

Monitoring Site Number	Description of Monitoring Site Calculations
RMP-1	Calculated (based on volume and estimated %solids)

5. The treatment, management, transportation, use, land application, or disposal of biosolids shall not cause a violation of the odor prohibition in subsection 62-296.320(2), F.A.C. [62-640.400(6)]
6. Storage of biosolids or other solids at this facility shall be in accordance with the Facility Biosolids Storage Plan. [62-640.300(4)]
7. Biosolids shall not be spilled from or tracked off the treatment facility site by the hauling vehicle. [62-640.400(9)]

B. Disposal

8. Disposal of biosolids, septage, and "other solids" in a solid waste disposal facility, or disposal by placement on land for purposes other than soil conditioning or fertilization, such as at a monofill, surface impoundment, waste pile, or dedicated site, shall be in accordance with Chapter 62-701, F.A.C. [62-640.100(6)(b) & (c)]

C. Transfer

9. The permittee shall not be held responsible for treatment and management violations that occur after its biosolids have been accepted by a permitted biosolids treatment facility with which the source facility has an agreement in accordance with subsection 62-640.880(1)(c), F.A.C., for further treatment, management, or disposal. [62-640.880(1)(b)]
10. The permittee shall keep hauling records to track the transport of biosolids between the facilities. The hauling records shall contain the following information:
- | | |
|---|---|
| <p>Source Facility</p> <ol style="list-style-type: none"> 1. Date and time shipped 2. Amount of biosolids shipped 3. Degree of treatment (if applicable) 4. Name and ID Number of treatment facility 5. Signature of responsible party at source facility 6. Signature of hauler and name of hauling firm | <p>Biosolids Treatment Facility or Treatment Facility</p> <ol style="list-style-type: none"> 1. Date and time received 2. Amount of biosolids received 3. Name and ID number of source facility 4. Signature of hauler 5. Signature of responsible party at treatment facility |
|---|---|

A copy of the source facility hauling records for each shipment shall be provided upon delivery of the biosolids to the biosolids treatment facility or treatment facility. The treatment facility permittee shall report to the Department within 24 hours of discovery any discrepancy in the quantity of biosolids leaving the source facility and arriving at the biosolids treatment facility or treatment facility.

[62-640.880(4)]

D. Receipt

11. If the permittee intends to accept biosolids from other facilities, a permit revision is required pursuant to paragraph 62-640.880(2)(d), F.A.C. [62-640.880(2)(d)]

PERMITTEE: Tradewinds Utilities Inc
 FACILITY: Tradewinds WWTF

PERMIT NUMBER: FLA010699
 EXPIRATION DATE: December 21, 2020

III. GROUND WATER REQUIREMENTS

1. The permittee shall give at least 72-hour notice to the Department's Central District Office, prior to the installation of any monitoring wells. [62-520.600(6)(h)]
2. Before construction of new ground water monitoring wells, a soil boring shall be made at each new monitoring well location to properly determine monitoring well specifications such as well depth, screen interval, screen slot, and filter pack. [62-520.600(6)(g)]
3. Within 30 days after installation of a monitoring well, the permittee shall submit to the Department's Central District Office well completion reports and soil boring/lithologic logs on the attached DEP Form(s) 62-520.900(3), Monitoring Well Completion Report. [62-520.600(6)(j) and .900(3)]
4. All piezometers and monitoring wells not part of the approved ground water monitoring plan shall be plugged and abandoned in accordance with Rule 62-532.500(5), F.A.C., unless future use is intended. [62-532.500(5)]
5. For the Part II land application system(s), all ground water quality criteria specified in Chapter 62-520, F.A.C., shall be met at the edge of the zone of discharge. The zone of discharge for Land Application Site R-001 shall extend horizontally 100 feet from the application site and vertically to the base of the surficial aquifer. [62-520.200(27)] [62-520.465]
6. The ground water minimum criteria specified in Rule 62-520.400 F.A.C., shall be met within the zone of discharge. [62-520.400 and 62-520.420(4)]
7. If the concentration for any constituent listed in Permit Condition III.10. in the natural background quality of the ground water is greater than the stated maximum, or in the case of pH is also less than the minimum, the representative background quality shall be the prevailing standard. [62-520.420(2)]
8. During the period of operation authorized by this permit, the permittee shall continue to sample ground water at the monitoring wells identified in Permit Condition III.9., below in accordance with this permit and the approved ground water monitoring plan prepared in accordance with Rule 62-520.600, F.A.C. [62-520.600] [62-610.412]
9. The following monitoring well shall be sampled for Reuse System, R-001.

Monitoring Well ID	Alternate Well Name and/or Description of Monitoring Location	Latitude			Longitude			Depth (Feet)	Aquifer Monitored	New or Existing
		°	'	"	°	'	"			
MWC-1	Compliance Well at Holding Pond	29	13	54	82	5	48	30	Floridan	Existing

MWC = Compliance; MWP = Piezometer

[62-520.600] [62-610.412]

10. The following parameters shall be analyzed for each monitoring well identified in Permit Condition III.9.:

Parameter	Compliance Well Limit	Units	Sample Type	Monitoring Frequency
Water Level Relative to NGVD	Report	ft	In Situ	Quarterly
Nitrogen, Nitrate, Total (as N)	10	mg/L	Grab	Quarterly
Solids, Total Dissolved (TDS)	500	mg/L	Grab	Quarterly
Chloride (as Cl)	250	mg/L	Grab	Quarterly
Arsenic, Total Recoverable	10	ug/L	Grab	Quarterly
Cadmium, Total Recoverable	5	ug/L	Grab	Quarterly
Chromium, Total Recoverable	100	ug/L	Grab	Quarterly
Lead, Total Recoverable	15	ug/L	Grab	Quarterly
Coliform, Fecal	4	#/100mL	Grab	Quarterly
pH	6.5-8.5	s.u.	Grab	Quarterly
Turbidity	Report	NTU	Grab	Quarterly
Nitrogen, Total	Report	mg/L	Grab	Quarterly

[62-520.600(11)(b)] [62-601.300(3), 62-601.700, and Figure 3 of 62-601] [62-601.300(6)] [62-520.310(5)]

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11. Water levels shall be recorded before evacuating each well for sample collection. Elevation references shall include the top of the well casing and land surface at each well site (NAVD allowable) at a precision of plus or minus 0.01 foot. *[62-520.600(11)(c)] [62-610.412(2)(c)]*
12. Ground water monitoring wells shall be purged prior to sampling to obtain representative samples. *[62-160.210] [62-601.700(5)]*
13. Analyses shall be conducted on unfiltered samples, unless filtered samples have been approved by the Department's Central District Office as being more representative of ground water conditions. *[62-520.310(5)]*
14. Ground water monitoring test results shall be submitted on Part D of Form 62-620.910(10) in accordance with Permit Condition I.B.7. *[62-520.600(11)(b)] [62-601.300(3), 62.601.700, and Figure 3 of 62-601] [62-620.610(18)]*
15. If any monitoring well becomes inoperable or damaged to the extent that sampling or well integrity may be affected, the permittee shall notify the Department's Central District Office within two business days from discovery, and a detailed written report shall follow within ten days after notification to the Department. The written report shall detail what problem has occurred and remedial measures that have been taken to prevent recurrence or request approval for replacement of the monitoring well. All monitoring well design and replacement shall be approved by the Department's Central District Office before installation. *[62-520.600(6)(1)]*

IV. ADDITIONAL REUSE AND LAND APPLICATION REQUIREMENTS

A. Part II Slow-Rate/Restricted Access System(s)

1. Advisory signs shall be posted around the site boundaries to designate the nature of the project area. *[62-610.418(1)]*
2. Routine aquatic weed control and regular maintenance of storage pond embankments and access areas are required. *[62-610.414(8)]*
3. The maximum annual average loading rate to the sprayfield shall be limited to 8.9 inches per week. The hydraulic loading rate shall not produce surface runoff or ponding of the applied reclaimed water. *[62-610.423(3) and (4)]*
4. The crops or vegetation shall be periodically harvested and removed from the project area. *[62-610.310(3)(d) and 62-610.419(1)(b)]*
5. Dairy cattle whose milk is intended for human consumption shall not be allowed on the project area for a period of 15 days after the last application of reclaimed water. No restrictions are imposed on the grazing of other cattle. *[62-610.425]*
6. Irrigation of edible food crops is prohibited. *[62-610.426]*
7. Overflows from emergency discharge facilities on storage ponds shall be reported as abnormal events in accordance with Permit Condition IX.20. *[62-610.800(9)]*

V. OPERATION AND MAINTENANCE REQUIREMENTS

A. Staffing Requirements

1. During the period of operation authorized by this permit, the wastewater facilities shall be operated under the supervision of operators certified in accordance with Chapter 62-602, F.A.C. In accordance with Chapter 62-699, F.A.C., this facility is a Category III, Class C facility and, at a minimum, operators with appropriate certification must be on the site as follows:

A Class C or higher operator 1/2 hour/day for 5 days/week and one visit each weekend. The lead/chief operator must be a Class C operator, or higher.

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2. An operator meeting the lead/chief operator class for the plant shall be available during all periods of plant operation. "Available" means able to be contacted as needed to initiate the appropriate action in a timely manner. *[62-699.311(1)]*

B. Capacity Analysis Report and Operation and Maintenance Performance Report Requirements

1. An updated capacity analysis report shall be submitted to the Department annually by November 1 of each year. The updated capacity analysis report shall be prepared in accordance with Rule 62-600.405, F.A.C. *[62-600.405(5)]*
2. The application to renew this permit shall include a detailed operation and maintenance performance report prepared in accordance with Rule 62-600.735, F.A.C. *[62-600.735(1)]*

C. Recordkeeping Requirements

1. The permittee shall maintain the following records and make them available for inspection on the site of the permitted facility.
 - a. Records of all compliance monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, including, if applicable, a copy of the laboratory certification showing the certification number of the laboratory, for at least three years from the date the sample or measurement was taken;
 - b. Copies of all reports required by the permit for at least three years from the date the report was prepared;
 - c. Records of all data, including reports and documents, used to complete the application for the permit for at least three years from the date the application was filed;
 - d. Monitoring information, including a copy of the laboratory certification showing the laboratory certification number, related to the residuals use and disposal activities for the time period set forth in Chapter 62-640, F.A.C., for at least three years from the date of sampling or measurement;
 - e. A copy of the current permit;
 - f. A copy of the current operation and maintenance manual as required by Chapter 62-600, F.A.C.;
 - g. A copy of any required record drawings;
 - h. Copies of the licenses of the current certified operators;
 - i. Copies of the logs and schedules showing plant operations and equipment maintenance for three years from the date of the logs or schedules. The logs shall, at a minimum, include identification of the plant; the signature and license number of the operator(s) and the signature of the person(s) making any entries; date and time in and out; specific operation and maintenance activities, including any preventive maintenance or repairs made or requested; results of tests performed and samples taken, unless documented on a laboratory sheet; and notation of any notification or reporting completed in accordance with Rule 62-602.650(3), F.A.C. The logs shall be maintained on-site in a location accessible to 24-hour inspection, protected from weather damage, and current to the last operation and maintenance performed; and
 - j. Records of biosolids quantities, treatment, monitoring, and hauling for at least five years.

[62-620.350, 62-602.650, 62-640.650(4)]

VI. SCHEDULES

1. The permittee is not authorized to discharge to waters of the state after the expiration date of this permit, unless:
 - a. The permittee has applied for renewal of this permit at least 180 days before the expiration date of this permit using the appropriate forms listed in Rule 62-620.910, F.A.C., and in the manner established in the Department of Environmental Protection Guide to Permitting Wastewater Facilities or Activities Under Chapter 62-620, F.A.C., including submittal of the appropriate processing fee set forth in Rule 62-4.050, F.A.C.; or

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- b. The permittee has made complete the application for renewal of this permit before the permit expiration date.

[62-620.335(1) - (4)]

VII. INDUSTRIAL PRETREATMENT PROGRAM REQUIREMENTS

1. This facility is not required to have a pretreatment program at this time. *[62-625.500]*

VIII. OTHER SPECIFIC CONDITIONS

1. The permittee shall comply with all conditions and requirements for reuse contained in their consumptive use permit issued by the Water Management District, if such requirements are consistent with Department rules. *[62-610.800(10)]*
2. In the event that the treatment facilities or equipment no longer function as intended, are no longer safe in terms of public health and safety, or odor, noise, aerosol drift, or lighting adversely affects neighboring developed areas at the levels prohibited by Rule 62-600.400(2)(a), F.A.C., corrective action (which may include additional maintenance or modifications of the permitted facilities) shall be taken by the permittee. Other corrective action may be required to ensure compliance with rules of the Department. Additionally, the treatment, management, use or land application of residuals shall not cause a violation of the odor prohibition in Rule 62-296.320(2), F.A.C. *[62-600.410(8) and 62-640.400(6)]*
3. The deliberate introduction of stormwater in any amount into collection/transmission systems designed solely for the introduction (and conveyance) of domestic/industrial wastewater; or the deliberate introduction of stormwater into collection/transmission systems designed for the introduction or conveyance of combinations of storm and domestic/industrial wastewater in amounts which may reduce the efficiency of pollutant removal by the treatment plant is prohibited, except as provided by Rule 62-610.472, F.A.C. *[62-604.130(3)]*
4. Collection/transmission system overflows shall be reported to the Department in accordance with Permit Condition IX. 20. *[62-604.550] [62-620.610(20)]*
5. The operating authority of a collection/transmission system and the permittee of a treatment plant are prohibited from accepting connections of wastewater discharges which have not received necessary pretreatment or which contain materials or pollutants (other than normal domestic wastewater constituents):
 - a. Which may cause fire or explosion hazards; or
 - b. Which may cause excessive corrosion or other deterioration of wastewater facilities due to chemical action or pH levels; or
 - c. Which are solid or viscous and obstruct flow or otherwise interfere with wastewater facility operations or treatment; or
 - d. Which result in the wastewater temperature at the introduction of the treatment plant exceeding 40°C or otherwise inhibiting treatment; or
 - e. Which result in the presence of toxic gases, vapors, or fumes that may cause worker health and safety problems.

[62-604.130(5)]

6. The treatment facility, storage ponds for Part II systems, rapid infiltration basins, and/or infiltration trenches shall be enclosed with a fence or otherwise provided with features to discourage the entry of animals and unauthorized persons. *[62-610.418(1) and 62-600.400(2)(b)]*
7. Screenings and grit removed from the wastewater facilities shall be collected in suitable containers and hauled to a Department approved Class I landfill or to a landfill approved by the Department for receipt/disposal of screenings and grit. *[62-701.300(1)(a)]*

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8. Where required by Chapter 471 or Chapter 492, F.S., applicable portions of reports that must be submitted under this permit shall be signed and sealed by a professional engineer or a professional geologist, as appropriate. *[62-620.310(4)]*
9. The permittee shall provide verbal notice to the Department's Central District Office as soon as practical after discovery of a sinkhole or other karst feature within an area for the management or application of wastewater, wastewater residuals (sludges), or reclaimed water. The permittee shall immediately implement measures appropriate to control the entry of contaminants, and shall detail these measures to the Department's Central District Office in a written report within 7 days of the sinkhole discovery. *[62-620.320(6)]*
10. The permittee shall provide notice to the Department of the following:
 - a. Any new introduction of pollutants into the facility from an industrial discharger which would be subject to Chapter 403, F.S., and the requirements of Chapter 62-620, F.A.C., if it were directly discharging those pollutants; and
 - b. Any substantial change in the volume or character of pollutants being introduced into that facility by a source which was identified in the permit application and known to be discharging at the time the permit was issued.

Notice shall include information on the quality and quantity of effluent introduced into the facility and any anticipated impact of the change on the quantity or quality of effluent or reclaimed water to be discharged from the facility.

[62-620.625(2)]

IX. GENERAL CONDITIONS

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to Chapter 403, Florida Statutes. Any permit noncompliance constitutes a violation of Chapter 403, Florida Statutes, and is grounds for enforcement action, permit termination, permit revocation and reissuance, or permit revision. *[62-620.610(1)]*
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviations from the approved drawings, exhibits, specifications, or conditions of this permit constitutes grounds for revocation and enforcement action by the Department. *[62-620.610(2)]*
3. As provided in subsection 403.087(7), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor authorize any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit or authorization that may be required for other aspects of the total project which are not addressed in this permit. *[62-620.610(3)]*
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title. *[62-620.610(4)]*
5. This permit does not relieve the permittee from liability and penalties for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted source; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department. The permittee shall take all reasonable steps to minimize or prevent any discharge, reuse of reclaimed water, or residuals use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[62-620.610(5)]*

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6. If the permittee wishes to continue an activity regulated by this permit after its expiration date, the permittee shall apply for and obtain a new permit. *[62-620.610(6)]*
7. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control, and related appurtenances, that are installed and used by the permittee to achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit. *[62-620.610(7)]*
8. This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[62-620.610(8)]*
9. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, including an authorized representative of the Department and authorized EPA personnel, when applicable, upon presentation of credentials or other documents as may be required by law, and at reasonable times, depending upon the nature of the concern being investigated, to:
 - a. Enter upon the permittee's premises where a regulated facility, system, or activity is located or conducted, or where records shall be kept under the conditions of this permit;
 - b. Have access to and copy any records that shall be kept under the conditions of this permit;
 - c. Inspect the facilities, equipment, practices, or operations regulated or required under this permit; and
 - d. Sample or monitor any substances or parameters at any location necessary to assure compliance with this permit or Department rules.

[62-620.610(9)]

10. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data, and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except as such use is proscribed by Section 403.111, F.S., or Rule 62-620.302, F.A.C. Such evidence shall only be used to the extent that it is consistent with the Florida Rules of Civil Procedure and applicable evidentiary rules. *[62-620.610(10)]*
11. When requested by the Department, the permittee shall within a reasonable time provide any information required by law which is needed to determine whether there is cause for revising, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. The permittee shall also provide to the Department upon request copies of records required by this permit to be kept. If the permittee becomes aware of relevant facts that were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be promptly submitted or corrections promptly reported to the Department. *[62-620.610(11)]*
12. Unless specifically stated otherwise in Department rules, the permittee, in accepting this permit, agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard. *[62-620.610(12)]*
13. The permittee, in accepting this permit, agrees to pay the applicable regulatory program and surveillance fee in accordance with Rule 62-4.052, F.A.C. *[62-620.610(13)]*
14. This permit is transferable only upon Department approval in accordance with Rule 62-620.340, F.A.C. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department. *[62-620.610(14)]*

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15. The permittee shall give the Department written notice at least 60 days before inactivation or abandonment of a wastewater facility or activity and shall specify what steps will be taken to safeguard public health and safety during and following inactivation or abandonment. *[62-620.610(15)]*
16. The permittee shall apply for a revision to the Department permit in accordance with Rules 62-620.300, F.A.C., and the Department of Environmental Protection Guide to Permitting Wastewater Facilities or Activities Under Chapter 62-620, F.A.C., at least 90 days before construction of any planned substantial modifications to the permitted facility is to commence or with Rule 62-620.325(2), F.A.C., for minor modifications to the permitted facility. A revised permit shall be obtained before construction begins except as provided in Rule 62-620.300, F.A.C. *[62-620.610(16)]*
17. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. The permittee shall be responsible for any and all damages which may result from the changes and may be subject to enforcement action by the Department for penalties or revocation of this permit. The notice shall include the following information:
 - a. A description of the anticipated noncompliance;
 - b. The period of the anticipated noncompliance, including dates and times; and
 - c. Steps being taken to prevent future occurrence of the noncompliance.*[62-620.610(17)]*
18. Sampling and monitoring data shall be collected and analyzed in accordance with Rule 62-4.246 and Chapters 62-160, 62-601, and 62-610, F.A.C., and 40 CFR 136, as appropriate.
 - a. Monitoring results shall be reported at the intervals specified elsewhere in this permit and shall be reported on a Discharge Monitoring Report (DMR), DEP Form 62-620.910(10), or as specified elsewhere in the permit.
 - b. If the permittee monitors any contaminant more frequently than required by the permit, using Department approved test procedures, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.
 - c. Calculations for all limitations which require averaging of measurements shall use an arithmetic mean unless otherwise specified in this permit.
 - d. Except as specifically provided in Rule 62-160.300, F.A.C., any laboratory test required by this permit shall be performed by a laboratory that has been certified by the Department of Health Environmental Laboratory Certification Program (DOH ELCP). Such certification shall be for the matrix, test method and analyte(s) being measured to comply with this permit. For domestic wastewater facilities, testing for parameters listed in Rule 62-160.300(4), F.A.C., shall be conducted under the direction of a certified operator.
 - e. Field activities including on-site tests and sample collection shall follow the applicable standard operating procedures described in DEP-SOP-001/01 adopted by reference in Chapter 62-160, F.A.C.
 - f. Alternate field procedures and laboratory methods may be used where they have been approved in accordance with Rules 62-160.220, and 62-160.330, F.A.C.*[62-620.610(18)]*
19. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule detailed elsewhere in this permit shall be submitted no later than 14 days following each schedule date. *[62-620.610(19)]*
20. The permittee shall report to the Department's Central District Office any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain: a description of the noncompliance and its cause; the period of noncompliance including exact dates and time, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

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- a. The following shall be included as information which must be reported within 24 hours under this condition:
 - (1) Any unanticipated bypass which causes any reclaimed water or effluent to exceed any permit limitation or results in an unpermitted discharge,
 - (2) Any upset which causes any reclaimed water or the effluent to exceed any limitation in the permit,
 - (3) Violation of a maximum daily discharge limitation for any of the pollutants specifically listed in the permit for such notice, and
 - (4) Any unauthorized discharge to surface or ground waters.
- b. Oral reports as required by this subsection shall be provided as follows:
 - (1) For unauthorized releases or spills of treated or untreated wastewater reported pursuant to subparagraph (a)4. that are in excess of 1,000 gallons per incident, or where information indicates that public health or the environment will be endangered, oral reports shall be provided to the STATE WATCH OFFICE TOLL FREE NUMBER (800) 320-0519, as soon as practical, but no later than 24 hours from the time the permittee becomes aware of the discharge. The permittee, to the extent known, shall provide the following information to the State Watch Office:
 - (a) Name, address, and telephone number of person reporting;
 - (b) Name, address, and telephone number of permittee or responsible person for the discharge;
 - (c) Date and time of the discharge and status of discharge (ongoing or ceased);
 - (d) Characteristics of the wastewater spilled or released (untreated or treated, industrial or domestic wastewater);
 - (e) Estimated amount of the discharge;
 - (f) Location or address of the discharge;
 - (g) Source and cause of the discharge;
 - (h) Whether the discharge was contained on-site, and cleanup actions taken to date;
 - (i) Description of area affected by the discharge, including name of water body affected, if any; and
 - (j) Other persons or agencies contacted.
 - (2) Oral reports, not otherwise required to be provided pursuant to subparagraph b.1 above, shall be provided to the Department's Central District Office within 24 hours from the time the permittee becomes aware of the circumstances.
- c. If the oral report has been received within 24 hours, the noncompliance has been corrected, and the noncompliance did not endanger health or the environment, the Department's Central District Office shall waive the written report.

[62-620.610(20)]

21. The permittee shall report all instances of noncompliance not reported under Permit Conditions IX.17., IX.18., or IX.19. of this permit at the time monitoring reports are submitted. This report shall contain the same information required by Permit Condition IX.20. of this permit. *[62-620.610(21)]*

22. Bypass Provisions.

- a. "Bypass" means the intentional diversion of waste streams from any portion of a treatment works.
- b. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless the permittee affirmatively demonstrates that:
 - (1) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and
 - (2) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 - (3) The permittee submitted notices as required under Permit Condition IX.22.c. of this permit.
- c. If the permittee knows in advance of the need for a bypass, it shall submit prior notice to the Department, if possible at least 10 days before the date of the bypass. The permittee shall submit notice of an unanticipated bypass within 24 hours of learning about the bypass as required in Permit Condition IX.20. of this permit. A notice shall include a description of the bypass and its cause; the period of the bypass, including exact dates and times; if the bypass has not been corrected, the anticipated time it is expected to continue; and the steps taken or planned to reduce, eliminate, and prevent recurrence of the bypass.

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- d. The Department shall approve an anticipated bypass, after considering its adverse effect, if the permittee demonstrates that it will meet the three conditions listed in Permit Condition IX.22.b.(1) through (3) of this permit.
- e. A permittee may allow any bypass to occur which does not cause reclaimed water or effluent limitations to be exceeded if it is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Permit Condition IX.22.b. through d. of this permit.

[62-620.610(22)]

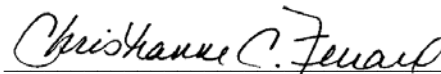
23. Upset Provisions.

- a. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based effluent limitations because of factors beyond the reasonable control of the permittee.
 - (1) An upset does not include noncompliance caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, careless or improper operation.
 - (2) An upset constitutes an affirmative defense to an action brought for noncompliance with technology based permit effluent limitations if the requirements of upset provisions of Rule 62-620.610, F.A.C., are met.
- b. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated;
 - (3) The permittee submitted notice of the upset as required in Permit Condition IX.20. of this permit; and
 - (4) The permittee complied with any remedial measures required under Permit Condition IX.5. of this permit.
- c. In any enforcement proceeding, the burden of proof for establishing the occurrence of an upset rests with the permittee.
- d. Before an enforcement proceeding is instituted, no representation made during the Department review of a claim that noncompliance was caused by an upset is final agency action subject to judicial review.

[62-620.610(23)]

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Christianne C. Ferraro, P.E.

Administrator

Permitting and Waste Cleanup Program - Wastewater

Permit Issuance Date: November 23, 2015

Attachment(s):
Discharge Monitoring Report

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: Tradewinds Utilities Inc
 MAILING ADDRESS: PO Box 5220
 Ocala, Florida 34478-5220

PERMIT NUMBER: FLA010699-004-DW3P
 LIMIT: Final
 CLASS SIZE: N/A
 MONITORING GROUP NUMBER: R-001
 MONITORING GROUP DESCRIPTION: Sprayfield, including Influent

DMR Effective Date: February 1, 2016
Expiration Date: December 21, 2020
REPORT FREQUENCY: Monthly
PROGRAM: Domestic

FACILITY: Tradewinds WWTF
 LOCATION: 2925 NE 43rd Pl
 Ocala, FL 34479-8842

RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING PERIOD From: _____ To: _____

COUNTY: Marion
 OFFICE: Central District

Parameter		Quantity or Loading	Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Flow (Effluent)	Sample Measurement									
PARM Code 50050 Y Mon. Site No. FLW-1	Permit Requirement	0.081 (An.Avg.)	MGD						5 Days/Week	Flow Totalizer
Flow (Effluent)	Sample Measurement									
PARM Code 50050 1 Mon. Site No. FLW-1	Permit Requirement	Report (Mo.Avg.)	MGD						5 Days/Week	Flow Totalizer
BOD, Carbonaceous 5 day, 20C	Sample Measurement									
PARM Code 80082 Y Mon. Site No. EFA-1	Permit Requirement				20.0 (An.Avg.)		mg/L		Monthly	Grab
BOD, Carbonaceous 5 day, 20C	Sample Measurement									
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		Monthly	Grab
Solids, Total Suspended	Sample Measurement									
PARM Code 00530 Y Mon. Site No. EFA-1	Permit Requirement				20.0 (An.Avg.)		mg/L		Monthly	Grab
Solids, Total Suspended	Sample Measurement									
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		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)

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

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Tradewinds WWTF

MONITORING GROUP R-001

PERMIT NUMBER: FLA010699-004-DW3P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration		Units	No. Ex.	Frequency of Analysis	Sample Type
Coliform, Fecal	Sample Measurement									
PARM Code 74055 Y Mon. Site No. EFA-1	Permit Requirement				200 (An.Avg.)		#/100mL		Monthly	Grab
Coliform, Fecal	Sample Measurement									
PARM Code 74055 A Mon. Site No. EFA-1	Permit Requirement				200 (Mo.Geo.Mn.)	800 (Max.)	#/100mL		Monthly	Grab
pH	Sample Measurement									
PARM Code 00400 A Mon. Site No. EFA-1	Permit Requirement				6.0 (Min.)	8.5 (Max.)	s.u.		5 Days/Week	Grab
Chlorine, Total Residual (For Disinfection)	Sample Measurement									
PARM Code 50060 A Mon. Site No. EFA-1	Permit Requirement				0.5 (Min.)		mg/L		5 Days/Week	Grab
Nitrogen, Total	Sample Measurement									
PARM Code 00600 Y Mon. Site No. EFA-1	Permit Requirement				Report (An.Avg.)		mg/L		Monthly	Grab
Nitrogen, Total	Sample Measurement									
PARM Code 00600 A Mon. Site No. EFA-1	Permit Requirement					Report (Mo.Avg.)	mg/L		Monthly	Grab
Phosphorus, Total (as P)	Sample Measurement									
PARM Code 00665 Y Mon. Site No. EFA-1	Permit Requirement				Report (An.Avg.)		mg/L		Monthly	Grab
Phosphorus, Total (as P)	Sample Measurement									
PARM Code 00665 A Mon. Site No. EFA-1	Permit Requirement					Report (Mo.Avg.)	mg/L		Monthly	Grab
Flow (Total through the plant)	Sample Measurement									
PARM Code 50050 P Mon. Site No. FLW-1	Permit Requirement		0.081 (An.Avg.)	MGD					5 Days/Week	Flow Totalizer
Flow (Total through the plant)	Sample Measurement									
PARM Code 50050 Q Mon. Site No. FLW-1	Permit Requirement	Report (Qt.Avg.)	Report (Mo.Avg.)	MGD					5 Days/Week	Flow Totalizer

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: Tradewinds Utilities Inc
 MAILING ADDRESS: PO Box 5220
 Ocala, Florida 34478-5220

PERMIT NUMBER: FLA010699-004-DW3P

FACILITY: Tradewinds WWTF
 LOCATION: 2925 NE 43rd Pl
 Ocala, FL 34479-8842

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

REPORT FREQUENCY: Annually
 PROGRAM: Domestic

COUNTY: Marion
 OFFICE: Central District

RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading	Units	Quality or Concentration	Units	No. Ex.	Frequency of Analysis	Sample Type
Nitrogen, Nitrate, Total (as N)	Sample Measurement							
PARM Code 00620 Y Mon. Site No. EFA-1	Permit Requirement			12.0 (An.Avg.)	mg/L		Annually	Grab
BOD, Carbonaceous 5 day, 20C (Influent)	Sample Measurement							
PARM Code 80082 G Mon. Site No. INF-1	Permit Requirement			Report (Max.)	mg/L		Annually	Grab
Solids, Total Suspended (Influent)	Sample Measurement							
PARM Code 00530 G Mon. Site No. INF-1	Permit Requirement			Report (Max.)	mg/L		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)

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: Tradewinds Utilities Inc
 MAILING ADDRESS: PO Box 5220
 Ocala, Florida 34478-5220

PERMIT NUMBER: FLA010699-004-DW3P

FACILITY: Tradewinds WWTF
 LOCATION: 2925 NE 43rd Pl
 Ocala, FL 34479-8842

LIMIT: Final
 CLASS SIZE: N/A
 MONITORING GROUP NUMBER: RMP-Q
 MONITORING GROUP DESCRIPTION: Biosolids Quantity

REPORT FREQUENCY: Monthly
 PROGRAM: Domestic

COUNTY: Marion
 OFFICE: Central District

RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING PERIOD From: _____ To: _____

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

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

DAILY SAMPLE RESULTS - PART B

Permit Number: FLA010699-004-DW3P
 Monitoring Period From: _____

Facility: Tradewinds WWTF

To: _____

	BOD, Carbonaceous 5 day, 20C mg/L	Chlorine, Total Residual (For Disinfection) mg/L	Coliform, Fecal #/100mL	Nitrogen, Total mg/L	Phosphorus, Total (as P) mg/L	Solids, Total Suspended mg/L	pH s.u.	Flow (Total through the plant) MGD	
Code	80082	50060	74055	00600	00665	00530	00400	50050	
Mon. Site	EFA-1	EFA-1	EFA-1	EFA-1	EFA-1	EFA-1	EFA-1	FLW-1	
1									
2									
3									
4									
5									
6									
7									
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24									
25									
26									
27									
28									
29									
30									
31									
Total									
Mo. Avg.									

PLANT STAFFING:

Day Shift Operator Class: _____ Certificate No: _____ Name: _____

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: Tradewinds WWTF
 Permit Number: FLA010699-004-DW3P
 County: Marion

Monitoring Well ID: MWC-1
 Well Type: Compliance
 Description: Compliance well @
 holding/polishing pond
 site
 Re-submitted DMR:

Report Frequency: Quarterly
 Program: Domestic

Office: Central District

Monitoring Period From: _____ To: _____

Date Sample Obtained: _____

Time Sample Obtained: _____

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		Report	ft	In Situ	Quarterly				
Nitrogen, Nitrate, Total (as N)	00620		10	mg/L	Grab	Quarterly				
Solids, Total Dissolved (TDS)	70295		500	mg/L	Grab	Quarterly				
Chloride (as Cl)	00940		250	mg/L	Grab	Quarterly				
Arsenic, Total Recoverable	00978		10	ug/L	Grab	Quarterly				
Cadmium, Total Recoverable	01113		5	ug/L	Grab	Quarterly				
Chromium, Total Recoverable	01118		100	ug/L	Grab	Quarterly				
Lead, Total Recoverable	01114		15	ug/L	Grab	Quarterly				
Coliform, Fecal	74055		4	#/100mL	Grab	Quarterly				
pH	00400		6.5-8.5	s.u.	Grab	Quarterly				
Turbidity	00070		Report	NTU	Grab	Quarterly				
Nitrogen, Total	00600		Report	mg/L	Grab	Quarterly				

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)

COMMENTS AND EXPLANATION (Reference all attachments here):

INSTRUCTIONS FOR COMPLETING THE WASTEWATER DISCHARGE MONITORING REPORT

Read these instructions before completing the DMR. Hard copies and/or electronic copies of the required parts of the DMR were provided with the permit. All required information shall be completed in full and typed or printed in ink. A signed, original DMR shall be mailed to the address printed on the DMR by the 28th of the month following the monitoring period. Facilities who submit their DMR(s) electronically through eDMR do not need to submit a hardcopy DMR. The DMR shall not be submitted before the end of the monitoring period.

The DMR consists of three parts--A, B, and D--all of which may or may not be applicable to every facility. Facilities may have one or more Part A's for reporting effluent or reclaimed water data. All domestic wastewater facilities will have a Part B for reporting daily sample results. Part D is used for reporting ground water monitoring well data.

When results are not available, the following codes should be used on parts A and D of the DMR and an explanation provided where appropriate. Note: Codes used on Part B for raw data are different.

CODE	DESCRIPTION/INSTRUCTIONS
ANC	Analysis not conducted.
DRY	Dry Well
FLD	Flood disaster.
IFS	Insufficient flow for sampling.
LS	Lost sample.
MNR	Monitoring not required this period.

CODE	DESCRIPTION/INSTRUCTIONS
NOD	No discharge from/to site.
OPS	Operations were shutdown so no sample could be taken.
OTH	Other. Please enter an explanation of why monitoring data were not available.
SEF	Sampling equipment failure.

When reporting analytical results that fall below a laboratory's reported method detection limits or practical quantification limits, the following instructions should be used, unless indicated otherwise in the permit or on the DMR:

1. Results greater than or equal to the PQL shall be reported as the measured quantity.
2. Results less than the PQL and greater than or equal to the MDL shall be reported as the laboratory's MDL value. These values shall be deemed equal to the MDL when necessary to calculate an average for that parameter and when determining compliance with permit limits.
3. Results less than the MDL shall be reported by entering a less than sign (" $<$ ") followed by the laboratory's MDL value, e.g. < 0.001 . A value of one-half the MDL or one-half the effluent limit, whichever is lower, shall be used for that sample when necessary to calculate an average for that parameter. Values less than the MDL are considered to demonstrate compliance with an effluent limitation.

PART A -DISCHARGE MONITORING REPORT (DMR)

Part A of the DMR is comprised of one or more sections, each having its own header information. Facility information is preprinted in the header as well as the monitoring group number, whether the limits and monitoring requirements are interim or final, and the required submittal frequency (e.g. monthly, annually, quarterly, etc.). Submit Part A based on the required reporting frequency in the header and the instructions shown in the permit. The following should be completed by the permittee or authorized representative:

Resubmitted DMR: Check this box if this DMR is being re-submitted because there was information missing from or information that needed correction on a previously submitted DMR. The information that is being revised should be clearly noted on the re-submitted DMR (e.g. highlight, circle, etc.)

No Discharge From Site: Check this box if no discharge occurs and, as a result, there are no data or codes to be entered for all of the parameters on the DMR for the entire monitoring group number; however, if the monitoring group includes other monitoring locations (e.g., influent sampling), the "NOD" code should be used to individually denote those parameters for which there was no discharge.

Monitoring Period: Enter the month, day, and year for the first and last day of the monitoring period (i.e. the month, the quarter, the year, etc.) during which the data on this report were collected and analyzed.

Sample Measurement: Before filling in sample measurements in the table, check to see that the data collected correspond to the limit indicated on the DMR (i.e. interim or final) and that the data correspond to the monitoring group number in the header. Enter the data or calculated results for each parameter on this row in the non-shaded area above the limit. Be sure the result being entered corresponds to the appropriate statistical base code (e.g. annual average, monthly average, single sample maximum, etc.) and units. Data qualifier codes are not to be reported on Part A.

No. Ex.: Enter the number of sample measurements during the monitoring period that exceeded the permit limit for each parameter in the non-shaded area. If none, enter zero.

Frequency of Analysis: The shaded areas in this column contain the minimum number of times the measurement is required to be made according to the permit. Enter the actual number of times the measurement was made in the space above the shaded area.

Sample Type: The shaded areas in this column contain the type of sample (e.g. grab, composite, continuous) required by the permit. Enter the actual sample type that was taken in the space above the shaded area.

Signature: This report must be signed in accordance with Rule 62-620.305, F.A.C. Type or print the name and title of the signing official. Include the telephone number where the official may be reached in the event there are questions concerning this report. Enter the date when the report is signed.

Comment and Explanation of Any Violations: Use this area to explain any exceedances, any upset or by-pass events, or other items which require explanation. If more space is needed, reference all attachments in this area.

PART B - DAILY SAMPLE RESULTS

Monitoring Period: Enter the month, day, and year for the first and last day of the monitoring period (i.e. the month, the quarter, the year, etc.) during which the data on this report were collected and analyzed.

Daily Monitoring Results: Transfer all analytical data from your facility's laboratory or a contract laboratory's data sheets for all day(s) that samples were collected. Record the data in the units indicated. Table 1 in Chapter 62-160, F.A.C., contains a complete list of all the data qualifier codes that your laboratory may use when reporting analytical results. However, when transferring numerical results onto Part B of the DMR, only the following data qualifier codes should be used and an explanation provided where appropriate.

CODE	DESCRIPTION/INSTRUCTIONS
<	The compound was analyzed for but not detected.
A	Value reported is the mean (average) of two or more determinations.
J	Estimated value, value not accurate.
Q	Sample held beyond the actual holding time.
Y	Laboratory analysis was from an unpreserved or improperly preserved sample.

To calculate the monthly average, add each reported value to get a total. For flow, divide this total by the number of days in the month. For all other parameters, divide the total by the number of observations.

Plant Staffing: List the name, certificate number, and class of all state certified operators operating the facility during the monitoring period. Use additional sheets as necessary.

PART D - GROUND WATER MONITORING REPORT

Monitoring Period: Enter the month, day, and year for the first and last day of the monitoring period (i.e. the month, the quarter, the year, etc.) during which the data on this report were collected and analyzed.

Date Sample Obtained: Enter the date the sample was taken. Also, check whether or not the well was purged before sampling.

Time Sample Obtained: Enter the time the sample was taken.

Sample Measurement: Record the results of the analysis. If the result was below the minimum detection limit, indicate that. Data qualifier codes are not to be reported on Part D.

Detection Limits: Record the detection limits of the analytical methods used.

Analysis Method: Indicate the analytical method used. Record the method number from Chapter 62-160 or Chapter 62-601, F.A.C., or from other sources.

Sampling Equipment Used: Indicate the procedure used to collect the sample (e.g. airlift, bucket/bailer, centrifugal pump, etc.)

Samples Filtered: Indicate whether the sample obtained was filtered by laboratory (L), filtered in field (F), or unfiltered (N).

Signature: This report must be signed in accordance with Rule 62-620.305, F.A.C. Type or print the name and title of the signing official. Include the telephone number where the official may be reached in the event there are questions concerning this report. Enter the date when the report is signed.

Comments and Explanation: Use this space to make any comments on or explanations of results that are unexpected. If more space is needed, reference all attachments in this area.

SPECIAL INSTRUCTIONS FOR LIMITED WET WEATHER DISCHARGES

Flow (Limited Wet Weather Discharge): Enter the measured average flow rate during the period of discharge or divide gallons discharged by duration of discharge (converted into days). Record in million gallons per day (MGD).

Flow (Upstream): Enter the average flow rate in the receiving stream upstream from the point of discharge for the period of discharge. The average flow rate can be calculated based on two measurements; one made at the start and one made at the end of the discharge period. Measurements are to be made at the upstream gauging station described in the permit.

Actual Stream Dilution Ratio: To calculate the Actual Stream Dilution Ratio, divide the average upstream flow rate by the average discharge flow rate. Enter the Actual Stream Dilution Ratio accurate to the nearest 0.1.

No. of Days the SDF > Stream Dilution Ratio: For each day of discharge, compare the minimum Stream Dilution Factor (SDF) from the permit to the calculated Stream Dilution Ratio. On Part B of the DMR, enter an asterisk (*) if the SDF is greater than the Stream Dilution Ratio on any day of discharge. On Part A of the DMR, add up the days with an "*" and record the total number of days the Stream Dilution Factor was greater than the Stream Dilution Ratio.

CBOD₅: Enter the average CBOD₅ of the reclaimed water discharged during the period shown in duration of discharge.

TKN: Enter the average TKN of the reclaimed water discharged during the period shown in duration of discharge.

Actual Rainfall: Enter the actual rainfall for each day on Part B. Enter the actual cumulative rainfall to date for this calendar year and the actual total monthly rainfall on Part A. The cumulative rainfall to date for this calendar year is the total amount of rain, in inches, that has been recorded since January 1 of the current year through the month for which this DMR contains data.

Rainfall During Average Rainfall Year: On Part A, enter the total monthly rainfall during the average rainfall year and the cumulative rainfall for the average rainfall year. The cumulative rainfall for the average rainfall year is the amount of rain, in inches, which fell during the average rainfall year from January through the month for which this DMR contains data.

No. of Days LWWD Activated During Calendar Year: Enter the cumulative number of days that the limited wet weather discharge was activated since January 1 of the current year.

Reason for Discharge: Attach to the DMR a brief explanation of the factors contributing to the need to activate the limited wet weather discharge.

**STATEMENT OF BASIS
FOR
STATE OF FLORIDA DOMESTIC WASTEWATER FACILITY PERMIT**

PERMIT NUMBER: FLA010699-004
 FACILITY NAME: Tradewinds WWTF
 FACILITY LOCATION: 2925 NE 43rd Pl, Ocala, FL 34479-8842
 Marion County
 NAME OF PERMITTEE: Tradewinds Utilities Inc
 PERMIT WRITER: Wilmott Brown, P.E.

1. SUMMARY OF APPLICATION

a. Chronology of Application

Application Number: FLA010699-004-DW3P
 Application Submittal Date: September 15, 2015

b. Type of Facility

Domestic Wastewater Treatment Plant
 Ownership Type: Private
 SIC Code: 4952

c. Facility Capacity

Existing Permitted Capacity: 0.081 mgd Annual Average Daily Flow
 Proposed Increase in Permitted Capacity: 0 mgd Annual Average Daily Flow
 Proposed Total Permitted Capacity: 0.081 mgd Annual Average Daily Flow

d. Description of Wastewater Treatment

An existing 0.081 million gallon day (mgd) annual average daily flow (AADF) permitted capacity extended aeration domestic wastewater treatment plant (a 0.065 mgd plant in parallel with a 0.050 mgd plant) consisting of flow equalization, aeration, secondary clarification, chlorination, and aerobic digestion of biosolids.

e. Description of Effluent Disposal and Land Application Sites

Land Application R-001: An existing 0.081 MGD annual average daily flow permitted capacity slow-rate restricted public access reuse system. R-001 consists of a three-day lined holding pond and a 2.34 acre sprayfield located approximately at latitude 29°13' 59" N, longitude 82°5' 45" W.

2. SUMMARY OF SURFACE WATER DISCHARGE

This facility does not discharge to surface waters.

3. BASIS FOR PERMIT LIMITATIONS AND MONITORING REQUIREMENTS

This facility is authorized to direct reclaimed water to Reuse System R-001, a slow-rate/restricted public access system, based on the following:

Parameter	Units	Max/Min	Limit	Statistical Basis	Rationale
Flow (Effluent)	MGD	Max	0.081	Annual Average	62-600.400(3)(b) & 62-610.810(5) FAC
		Max	Report	Monthly Average	62-600.400(3)(b) & 62-610.810(5) FAC
BOD, Carbonaceous 5 day, 20C	mg/L	Max	20.0	Annual Average	62-610.410 & 62-600.740(1)(b)1.a. FAC
		Max	30.0	Monthly Average	62-600.740(1)(b)1.b. FAC
		Max	45.0	Weekly Average	62-600.740(1)(b)1.c. FAC
		Max	60.0	Single Sample	62-600.740(1)(b)1.d. FAC

Parameter	Units	Max/Min	Limit	Statistical Basis	Rationale
Solids, Total Suspended	mg/L	Max	20.0	Annual Average	62-610.410(2)(a) FAC
		Max	30.0	Monthly Average	62-600.740(1)(b)1.b. FAC
		Max	45.0	Weekly Average	62-600.740(1)(b)1.c. FAC
		Max	60.0	Single Sample	62-600.740(1)(b)1.d. FAC
Coliform, Fecal	#/100mL	Max	200	Monthly Geometric Mean	62-600.440(4)(c)2. FAC
		Max	200	Annual Average	62-610.410 & 62-600.440(4)(c)1. FAC
		Max	800	Single Sample	62-600.440(4)(c)4. FAC
pH	s.u.	Min	6.0	Single Sample	62-600.445 FAC
		Max	8.5	Single Sample	62-600.445 FAC
Chlorine, Total Residual (For Disinfection)	mg/L	Min	0.5	Single Sample	62-610.410 & 62-600.440(4)(b) FAC
Nitrogen, Nitrate, Total (as N)	mg/L	Max	12.0	Annual Average	62-610.510, F.A.C. Annual frequency: 62-601.300(6) FAC
Nitrogen, Total	mg/L	Max	Report	Annual Average	62-601.300(6) FAC
		Max	Report	Monthly Average	62-601.300(6) FAC
Phosphorus, Total (as P)	mg/L	Max	Report	Annual Average	62-601.300(6) FAC
		Max	Report	Monthly Average	62-601.300(6) FAC

Other Limitations and Monitoring Requirements:

Parameter	Units	Max/Min	Limit	Statistical Basis	Rationale
Flow (Total through the plant)	MGD	Max	0.081	Annual Average	62-600.400(3)(b) FAC
		Max	Report	Monthly Average	62-600.400(3)(b) FAC
		Max	Report	Quarterly Average	62-600.400(3)(b) FAC
Percent Capacity, (TMADF/Permitted Capacity) x 100	percent	Max	Report	Monthly Average	62-600.405(4) FAC
BOD, Carbonaceous 5 day, 20C (Influent)	mg/L	Max	Report	Single Sample	62-601.300(1) FAC Annual frequency: 62-601.300(6) FAC
Solids, Total Suspended (Influent)	mg/L	Max	Report	Single Sample	62-601.300(1) FAC Annual frequency: 62-601.300(6) FAC
Monitoring Frequencies and Sample Types	-	-	-	All Parameters	62-601 FAC & 62-699 FAC and/or BPJ of permit writer
Sampling Locations	-	-	-	All Parameters	62-601, 62-610.412, 62-610.463(1), 62-610.568, 62-610.613 FAC and/or BPJ of permit writer

4. DISCUSSION OF CHANGES TO PERMIT LIMITATIONS

The current wastewater permit for this facility will expire on December 21, 2015. This permit, FLA010699-004-DW3P, will become effective on December 22, 2015 and expire on December 21, 2020.

Monitoring for total nitrogen (TN) and total phosphorus (TP) are required, as allowed by Rule 62-601.300(6), FAC, to evaluate impacts of reclaimed water to ground and surface waters in an impaired water basin. [62-601.300(6)]

5. BIOSOLIDS MANAGEMENT REQUIREMENTS

Biosolids generated by this facility may be transferred to 412 Biosolids or disposed of in a Class I solid waste landfill.

See the table below for the rationale for the biosolids quantities monitoring requirements.

Parameter	Units	Max/Min	Limit	Statistical Basis	Rationale
Biosolids Quantity (Transferred)	dry tons	Max	Report	Monthly Total	62-640.650(5)(a)1. FAC
Biosolids Quantity (Landfilled)	dry tons	Max	Report	Monthly Total	62-640.650(5)(a)1. FAC
Monitoring Frequency	All Parameters				62-640.650(5)(a) FAC

6. GROUND WATER MONITORING REQUIREMENTS

Ground water monitoring requirements have been established in accordance with Chapters 62-520, 532, 601, 610, and 620, F.A.C., because of the impaired integrity of the clay-lined holding pond associated with the sprayfield.

7. PERMIT SCHEDULES

A schedule is not included in the wastewater permit.

8. INDUSTRIAL PRETREATMENT REQUIREMENTS

At this time, the facility is not required to develop an approved industrial pretreatment program. However, the Department reserves the right to require an approved program if future conditions warrant.

9. ADMINISTRATIVE ORDERS (AO) AND CONSENT ORDERS (CO)

This permit is not accompanied by an AO and the permittee has not entered into a CO with the Department.

10. REQUESTED VARIANCES OR ALTERNATIVES TO REQUIRED STANDARDS

No variances were requested for this facility.

11. TERM OF THE PERMIT

This is a five year permit.

12. THE ADMINISTRATIVE RECORD

The administrative record including application, draft permit, fact sheet, public notice (after release), comments received and additional information is available for public inspection during normal business hours at the location specified in item 14. Copies will be provided at a minimal charge per page.

13. PROPOSED SCHEDULE FOR PERMIT ISSUANCE

Effective date of Permit December 22, 2015

Notice of Permit Issuance November 20, 2015

14. DEPARTMENT CONTACT

Additional information concerning the permit and proposed schedule for permit issuance may be obtained during normal business hours from:

Wilmott Brown
Professional Engineer I

3319 Maguire Blvd
Suite 232
Orlando, FL 32803-3767

Telephone No.: (407) 897-4100

ATTACHMENT B

Wastewater Inspection Report - 2020



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

August 3, 2020

Charles DeMenzes, President
Tradewinds Utilities Inc.
2925 NE 43rd Pl
Ocala, Florida 34478
utilitiesmanagementteam@gmail.com

Re: Warning Letter
Tradewinds WWTF
DW FLA010699
Marion County

Dear Mr. Demenzes:

A Compliance Evaluation Inspection (CEI) was conducted at your facility on July 14, 2020. During this inspection, possible violations of Chapter 403, F.S., Chapter 62-610, Florida Administrative Code (F.A.C.), and Chapter 62-620, F.A.C. were observed.

During the inspection Department personnel noted the following:

- Failure to meet Administrative Order AO-SS-16-016 reporting requirements
- Failure to meet secondary treatment requirements for Total Suspended Solids (TSS)
- Failure to submit quarterly groundwater monitoring reports
- Failure to maintain the clay lined holding pond
- Failure to maintain the spray field

Please contact Carolyn Hall, at (407) 897-4114, within **7 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), Florida Statutes. We look forward to your cooperation in completing the investigation and resolving this matter.

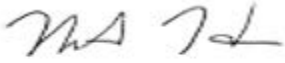
Tradewinds WWTF; Facility ID No.: FLA010699

Warning Letter

Page 2 of 2

Date

Sincerely,

A handwritten signature in black ink, appearing to read "AW 7/2", is positioned below the word "Sincerely,".

On behalf of:

Aaron Watkins, Director

Central District

Florida Department of Environmental Protection

AW/nh/ds/ch

Enclosures: Inspection Report (with attachments)

cc: Steve McGee smcgee1953@yahoo.com

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
WASTEWATER COMPLIANCE INSPECTION REPORT**

Facility Name and Physical Address Tradewinds WWTF 2925 NE 43rd Pl Ocala, FL 34479	WAFR ID FLA010699	County Marion	Entry Date 7/14/2020	Entry Time 9:38 am
	Facility Phone # N/A		Exit Date 7/14/2020	Exit Time 10:21 am

LAT	29	°	13	'	53.37	"
LONG	82	°	5	'	48.28	"

Name(s) of Field Representatives(s) and Title Steve McGee	Operator Certification # C-0008154	Email smcgee1953@yahoo.com	Phone (352)598-2121
---	--	--------------------------------------	-------------------------------

Name & Address of Permittee / Designated Rep. Charles DeMenzes PO Box 5220 Ocala, FL 34478	Title President	Email utilitiesmanagementteam@gmail.com	Phone (352) 622-4949
--	---------------------------	--	--------------------------------

Inspection Type	<input checked="" type="checkbox"/> C	<input type="checkbox"/> E	<input type="checkbox"/> I	Samples Taken(Y/N): N	Sample ID#: N/A	Samples Split (Y/N): N
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Domestic **Industrial**

FACILITY COMPLIANCE AREAS EVALUATED							
IC = In Compliance; MC = Minor Out of Compliance; NC = Out of Compliance; SC = Significant out of Compliance; NA = Not Applicable; NE = Not Evaluated Significant Non-Compliance Criteria Should be Reviewed when Out of Compliance Ratings Are Given in Areas Marked by a "♦"							
	PERMITS/ORDERS		SELF MONITORING PROGRAM		FACILITY OPERATIONS		EFFLUENT/DISPOSAL
IC	1. ♦ Permit	IC	3. Laboratory	IC	6. Facility Site Review	SC	9. ♦ Effluent Quality
NA	2. ♦ Compliance Schedules	IC	4. Sampling	IC	7. Flow Measurement	NC	10. ♦ Effluent Disposal
		NC	5. ♦ Records & Reports	IC	8. ♦ Operation & Maintenance	IC	11. Biosolids
						NC	12. ♦ Groundwater
NA	14. Other					IC	13. ♦ SSO Survey

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
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Recommended Actions: Warning Letter

Name(s) and Signature(s) of Inspector(s) Carolyn Hall 	District Office/Phone Number Central District (407) 897-4114	Date 7/15/2020
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Name and Signature of Reviewer David Smicherko 	District Office/Phone Number Central District (407) 897-4169	Date 8/3/2020
--	---	-------------------------

Single Event Violations (*SNC SEVs)

Check for Yes	Evaluation Area	Description	Finding Description	Finding ID
<input type="checkbox"/>	Permit	Effluent Violations - Unapproved Bypass	Wastewater was diverted from a portion of the treatment process without department approval.	UNBY
<input type="checkbox"/>	*Permit	Permit Violations - Discharge Without a Valid Permit	The facility was operating without a permit or with an expired permit.	UPHI
<input type="checkbox"/>	Permit	Permit Violations - Failure to Submit Timely Permit Renewal Application	The permittee failed to submit an application to renew the existing permit at least 180 days prior to expiration.	PFSA
<input type="checkbox"/>	Laboratory	Management Practice Violations - Laboratory Not Certified	The laboratory was not certified by the Florida Department of Health and therefore is not certified to meet NELAC standards.	LNCE
<input type="checkbox"/>	Sampling	Monitoring Violations - Analysis not Conducted	The facility failed to collect and/or analyze samples as required by permit or enforcement action.	ANCV
<input type="checkbox"/>	Sampling	Monitoring Violations - Failure to Monitor for Toxicity Requirements	The facility failed to collect and/or analyze routine or follow-up toxicity samples.	FTOX
<input type="checkbox"/>	Records and Reports	Management Practice Violations - Failure to Develop Adequate SPCC Plan	The facility failed to develop or maintain their Spill Prevention Control and Countermeasures (SPCC) plan.	FSPC
<input type="checkbox"/>	Records and Reports	Management Practice Violations - Failure to Maintain Records	The facility failed to maintain records for the required retention period.	FMRR
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to Notify	The permittee failed to notify the department of any event or activity that requires notification as required by permit or rule.	RSWP
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to Submit DMRs	The permittee failed to submit any DMR required by rule, permit, or enforcement action in a timely manner.	FDMR
<input type="checkbox"/>	Records and Reports	Reporting Violations - Failure to submit required report (non-DMR, non-pretreatment)	The facility failed to submit any report required by rule, permit, enforcement action or inspection activity except for DMRs.	FRPT
<input type="checkbox"/>	Facility Site Review	Management Practice Violations - Improper Land Application (non-503, non-CAFO)	The land application system was not being maintained.	LASN
<input type="checkbox"/>	Flow Measurement	Monitoring Violations - No Flow Measurement Device	The facility failed to install a flow measurement device, an approved flow measurement device, or a working flow measurement device.	NOFL
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - Improper Operation and Maintenance	The facility failed to follow their operation and maintenance plan/manual or their Biosolids Nutrient Management Plan.	IONM
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - Inflow/Infiltration (I/I)	The facility had an inflow and infiltration problem causing collection system issues and/or operational issues.	ININ
<input type="checkbox"/>	Operation and Maintenance	Management Practice Violations - No Licensed/Certified Operator	The facility was being operated without a certified operator or by an operator that is not licensed for the size of plant.	ONCO
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent acute toxicity has been documented through follow-up tests.	EATX
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent chronic toxicity has been documented through follow-up tests.	ECTX
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Failed Toxicity Test	Persistent acute or chronic toxicity has been documented in the effluent through the use of routine and follow-up tests.	ETOX
<input type="checkbox"/>	Effluent Quality	Effluent Violations - Narrative Effluent Violation	The facility violated a permit or enforcement narrative effluent limit.	XNEV
<input type="checkbox"/>	*Effluent Quality	Effluent Violations - Reported Fish Kill	The facility had a discharge of wastewater that resulted in a fish kill.	XFSH
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Discharge to Waters	A sewage spill from any components of a collection/transmission system or from a treatment plant reached surface waters including stormwater conveyance system or drainage ditch.	SSO1
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to Maintain Records or Meet Record Keeping Requirements	The facility failed to keep routine documentation and reporting records of spills, and/or operation and maintenance activities on the collection/transmission system.	SSO2
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to monitor	The facility failed to collect and/or analyze bacteriological samples for sewage spills that reached surface waters.	SSO3
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Failure to report violation that may endanger public health 122.41(1)(7)	The facility failed to report a sewage spill within 24 hours of discovery.	SSO4
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Improper Operation and Maintenance	The facility failed to perform routine preventative maintenance to keep the collection/transmission system in good working order.	SSO5
<input type="checkbox"/>	Sanitary Sewer Overflow Survey	WW SSO - Overflow to Dry Land	A sewage spill from any part of a collection/transmission system or treatment plant that did not make it to surface waters, i.e., stormwater collection system, drainage ditch, stream, pond, or lake.	SSO6

Facility Treatment Summary:

An existing 0.081 million gallon day (mgd) annual average daily flow (AADF) permitted capacity extended aeration domestic wastewater treatment plant (a 0.065 mgd plant in parallel with a 0.050 mgd plant) consisting of flow equalization, aeration, secondary clarification, chlorination, and aerobic digestion of biosolids.

Land Application R-001: An existing 0.081 MGD annual average daily flow permitted capacity slow-rate restricted public access reuse system. R-001 consists of a three-day clay-lined holding pond and a 2.34 acre sprayfield located approximately at latitude 29°13' 59" N, longitude 82°5' 45" W.

1. ♦Permit: In-Compliance

Current Permit available on-site?	Yes
Date Permit issued	December 22, 2015
Date Permit Expires	December 21, 2020
Permit Renewal Application due by	June 24, 2020
Administrative or Judicial Orders?	Administrative Order

- 1.1 Observation: The facility is currently under Administrative Order AO-SS-16-016. Please see deficiency 5.1 and observations about the AO.
- 1.2 Observation: At the time of inspection the permit renewal is in house.
- 1.3 Observation: At the time of inspection a copy of the current permit was available on site.

2. ♦Compliance Schedules: Not Applicable

Compliance Schedule in Permit met?	Not Applicable
Compliance Schedules in Order are being met?	Not Applicable

- 2.1 Observation: At the time of inspection there are no compliance schedules listed in permit or the administrative order.

3. Laboratory: In-Compliance

Contract Lab Name and Certification #	Aqua Pure Water & Sewer Service E83265
Facility NELAC Certification #	Not Applicable

- 3.1 Observation: At the time of inspection a copy of the current lab certification was on site and valid until June 30, 2021.

4. Sampling: In-Compliance

Sampling conducted during inspection?	No
Sampling observed during inspection?	No
Sampling conducted at locations identified by the permit?	Yes
Safe access to sampling locations?	Yes

- 4.1 Observation: At the time of inspection the operator is able to identify the correct sampling locations for EFA-1 as the chlorine contact chamber.

5. ♦Records and Reports: Out-of-Compliance

Documents/Records reviewed	Time frame
Discharge Monitoring Reports (DMRs)	From 06/01/2019 to 06/30/2020

- 5.1 **Deficiency: The biannual Total Nitrogen status reports have not been submitted for January 1, 2020 and July 1, 2020 in accordance with the Administrative Order AO-SS-16-016.**

Rule/Permit Reference: 403.161(1)(b), F.S. It shall be a violation of this chapter, and it shall be prohibited for any person: (b) To fail to obtain any permit required by this chapter or by rule or regulation, or to violate or fail to comply with any rule, regulation, order, permit, or certification adopted or issued by the department pursuant to its lawful authority. Administrative Order AO-SS-16-016 (1): An Administrative Order (AO) is attached to this permit revision and is incorporated into the permit for this wastewater treatment facility. The AO requires that Total Nitrogen in the reclaimed water from the wastewater facility referenced above be monitored, reported and subsequently reduced to 6.0 mg/L by October 26, 2020 since this facility is located within the Primary Protection Zone. The attached AO also requires biannual status reports discussing the facility’s ability and/or plans to meet this new reclaimed water limit. The reports will be due January 1 and July 1 beginning in 2017. Your current operating permit expires December 21, 2020.

Corrective Action: Please submit the status reports on how the facility will comply with the Total Nitrogen limit set forth in AO-SS-16-016.

- 5.2 Observation: Historical department records indicate groundwater sampling was added to this facility because the clay lined holding pond may be percolating.
- 5.3 Observation: At the time of inspection the RPZ was last calibrated on September 16, 2019 and is not due yet.
- 5.4 Observation: At the time of inspection the operation and maintenance manual were available on site.

- 5.5 Observation: At the time of inspection the operator's certification for Steve McGee (C-0008154) was on site.
- 5.6 Observation: At the time of inspection the log book was on site. It was bound and numbered. It contained relevant sampling and maintenance.
- 5.7 Observation: At the time of inspection the operator is meeting and exceeding on site time requirements at 6 days a week for a half hour each day.

6. Facility Site Review: In-Compliance

- 6.1 Observation: *Access Control*- At the time of inspection the facility grounds for the plant were properly locked and secured by a fence. An advisory sign was posted at the gate entrance. There were no excessive odors. No spills or leaks, excessive noise, or corrosion were noted at time of inspection. An RPZ backflow was present with no visible leaks.
- 6.2 Observation: *Headworks*- Influent is pumped in from one of the six lift station, through a bar screen and into a surge tank. From the surge tank water is diverted through a splitter box into one of two trains (McNeil and Marlof). The bar screen is manual and cleaned at each site visit. Debris are disposed of in a covered screenings container. There are minimal odors at the time of inspection, but within the boundary of the facility.
- 6.3 Observation: *Aeration Basin/Blower*- The facility contains two (2) blowers, one per train. At the time of inspection both blowers were operational. Each blower was covered. The RAS was in the correct position. The McNeil side of the plant contains two aeration basins. The contents in the aeration chambers were brown in color and appeared to be adequately mixed with no excessive foaming. No excessive noise or odor was noted. The Marolf side of the plant contains a total of 10 aeration basins. The contents were brown in color and appeared to be adequately mixed. There was no excessive foaming or excessive odors.
- 6.4 Observation: *Clarifier*- The McNeil plant contains two clarifiers. At the time of inspection, the surface of the clarifier was very turbid. The stilling well had minor debris. The skimmer was operational in each clarifier. The weirs appeared level with no fouling and to be functioning properly. Effluent from each clarifier was turbid. There are chlorine tablets in each weir, leaving the weirs clean and free of algae at the time of inspection. The Marolf plant contains one clarifier. Effluent in this plant was also turbid. The stilling well had minor debris and the skimmer was operational. Effluent leaving the weir was slightly turbid. The weir was level and without fouling.
- 6.5 Observation: *Disinfection*- The effluent from each plant joins into a wet well where it then goes to the chlorine contact chamber. Sodium hypochlorite was used for disinfection on site. There was one Chem Tech 100, 30 gpd hypo pump and it was operational. There is one baffle present. The chlorine contact chamber contained cloudy effluent and did not appear to have solids during inspection. Effluent is then pumped put into the spray field by two pumps.

- 6.6 *Observation: Digester/ Sludge Holding Tank-* The facility contains one sludge holding basin per train. At the time of inspection there was sufficient storage available in each, no excessive odors or vectors were noticed.
- 6.7 *Observation: Lift Station-* The facility contains six operational lift stations throughout the community that were not evaluated at the time of inspection.

7. Flow Measurement: In-Compliance

Flow meter present and location as per permit?	Yes
Easy access to flow meter?	Yes
Date of last flow meter calibration	See Observation

- 7.1 *Observation:* At the time of inspection a copy of the current flow calibration was not directly on site. It was located in the office for the permit renewal process. Department records show the flow calibration was completed on May 20, 2020 by Florida Rural Water Association.
- 7.2 *Observation:* At the time of inspection, a review of the logbook indicates the facility has a few days of exceeded flow. The operator notes Florida Rural Water association has been brought in to address this issue. Their current percent capacity is running around 90% and should be monitored.

8. ♦Operation and Maintenance: In-Compliance

Facility being operated as per permit?	Yes
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- 8.1 *Observation:* At the time of inspection the facility appears to be operating per the permit conditions.

9. ♦Effluent Quality: Significant-Out-Of-Compliance

DMRs review period	From 06/01/2019 to 06/30/2020
Any exceedances?	Yes

- 9.1 **Deficiency: The following exceedances were noted during the DMR review period of June 1, 2019 to June 30, 2020.**

Month	Monitoring Location	Parameter	Result	Limit
05/2020	EFA-1	BOD Monthly Avg	60 mg/L	30 mg/L
05/2020	EFA-1	BOD Weekly Avg	60 mg/L	45mg/L
05/2020	EFA-1	TSS Annual Avg	23.4 mg/L	20 mg/L
04/2020	EFA-1	TSS Annual Avg	23.7 mg/L	20 mg/L
03/2020	EFA-1	TSS Annual Avg	28.1 mg/L	20 mg/L

03/2020	EFA-1	TSS max	85 mg/L	60 mg/L
03/2020	EFA-1	TSS Weekly Avg	85 mg/L	45 mg/L
03/2020	EFA-1	TSS monthly Avg	85 mg/L	30 mg/L
02/2020	EFA-1	TSS Annual Avg	22 mg/L	20 mg/L
02/2020	EFA-1	TSS Monthly Avg	35 mg/L	30 mg/L
01/2020	EFA-1	TSS Monthly Avg	42 mg/L	30 mg/L
07/2019	EFA-1	TSS Annual Avg	21.8 mg/L	20 mg/L
07/2019	EFA-1	TSS Monthly Avg	48 mg/L	30 mg/L
07/2019	EFA-1	TSS Weekly Avg	48 mg/L	45 mg/L

Rule/Permit Reference: Chapter 62-610.420(b), F.A.C. Except as specifically required by other Department rules or Florida Statutes, all domestic wastewater facilities shall provide, at a minimum, secondary treatment of wastewater prior to reuse or disposal. Secondary treatment requirements are specified below:

(b) Total Suspended Solids

1. The annual average shall not exceed 20.0 mg/L,
2. The monthly average shall not exceed 30.0 mg/L,
3. The weekly average shall not exceed 45.0 mg/L; and,
4. The maximum-permissible concentration in any single sample shall not exceed 60.0 mg/L.

Corrective Action: The exceedances were reported on the DMR and marked as an exceedance. No further action is required at this time.

9.2 Observation: The following Total Nitrogen limits were observed through the DMR review period of June 1, 2019 through June 30, 2020. These levels are trending upwards and will not meet the new requirements of the AO-SS-16-016 effective October 27, 2020.

Month	Monitoring Location	Parameter	Result	New AO Limit Effective 10/27/2020
05/2020	EFA-1	Nitrogen, Total Annual Avg	30.7 mg/L	6 mg/L
04/2020	EFA-1	Nitrogen, Total Annual Avg	30.2 mg/L	6 mg/L
03/2020	EFA-1	Nitrogen, Total Annual Avg	29.2 mg/L	6 mg/L

02/2020	EFA-1	Nitrogen, Total Annual Avg	26.3 mg/L	6 mg/L
01/2020	EFA-1	Nitrogen, Total Annual Avg	22.2 mg/L	6 mg/L
12//2019	EFA-1	Nitrogen, Total Annual Avg	21.29 mg/L	6 mg/L
11/2019	EFA-1	Nitrogen, Total Annual Avg	19.95 mg/L	6 mg/L
10/2019	EFA-1	Nitrogen, Total Annual Avg	18.13 mg/L	6 mg/L
09/2019	EFA-1	Nitrogen, Total Annual Avg	17.91 mg/L	6 mg/L
08/2019	EFA-1	Nitrogen, Total Annual Avg	17.45 mg/L	6 mg/L
07/2019	EFA-1	Nitrogen, Total Annual Avg	24 mg/L	6 mg/L
06/2019	EFA-1	Nitrogen, Total Annual Avg	15.14 mg/L	6 mg/L

10. ♦ Effluent Disposal: Out-of-Compliance

Facility discharging?	Yes
Discharge location(s) as per permit?	Yes

10.1 Deficiency: At the time of inspection the clay lined holding pond had excessive vegetation, reducing the storage capacity.

Rule/Permit Reference: Chapter 62-610.523, F.A.C.: (6) Rapid infiltration basins, percolation ponds, basins, trenches, or cells shall be routinely maintained to control vegetation growth and to maintain percolation capability by scarification or removal of deposited solids

Corrective Action: Please remove the excessive vegetation and provide photos to the department by email.

10.2 Deficiency: At the time of inspection the spray field was missing several spray heads.

Rule/Permit Reference: Ch. 62-620.610(7) F.A.C. - All facilities and equipment necessary for the treatment, reuse, and disposal of domestic wastewater and biosolids shall be maintained, at a minimum, so as to function as intended. The permittee shall at all times properly operate and maintain the facility and systems of treatment and

control, and related appurtenances, that are installed and used by the permittee to achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit.

Corrective Action: Please repair the missing spray heads and provide photos to the department by email.

- 10.3 Observation: At the time of inspection the holding pond had dense aquatic vegetation in the center of the pond. Minimal water was noted in the pond.
- 10.4 Observation: At the time of inspection the spray field was recently on so only the perimeter was walked. It was noted at least 5 spray heads were missing and the valves to these spray head were turned off.
- 10.5 Observation: At the time of inspection the spray field appeared to have mostly even vegetative growth, but it was recently mowed. No ponding was observed.

11. Biosolids: In-Compliance

- 11.1 Observation: At the time of inspection there are copies of older hauling records (2017) on site from American Pipe and tank. The operator notes the new ones are in the office.

12. ♦Groundwater Quality: Out-of-Compliance

DMRs review period	From 06/01/2019-06/30/2020
Any exceedances?	See Observation
All monitoring wells accessible, secured & locked?	See Observation

- 12.1 **Deficiency: The required MWC-1 ground water monitoring reports (Part D) have not been submitted to the department quarterly in accordance with the frequency in the Permit. The facility is currently missing 3rd and 4th Quarter reports for 2019 and 1st and 2nd Quarter reports for 2020.**

Rule/Permit Reference: Permit Condition III.10 The following parameters shall be analyzed for each monitoring well identified in Permit Condition III.9.:

Parameter	Compliance Well Limit	Units	Sample Type	Monitoring Frequency
Water Level Relative to NGVD	Report	ft	In Situ	Quarterly
Nitrogen, Nitrate, Total (as N)	10	mg/L	Grab	Quarterly
Solids, Total Dissolved (TDS)	500	mg/L	Grab	Quarterly

Parameter	Compliance Well Limit	Units	Sample Type	Monitoring Frequency
Chloride (as Cl)	250	mg/L	Grab	Quarterly
Arsenic, Total Recoverable	10	ug/L	Grab	Quarterly
Cadmium, Total Recoverable	5	ug/L	Grab	Quarterly
Chromium, Total Recoverable	100	ug/L	Grab	Quarterly
Lead, Total Recoverable	15	ug/L	Grab	Quarterly
Coliform, Fecal	4	#/100mL	Grab	Quarterly
pH	6.5-8.5	s.u.	Grab	Quarterly
Turbidity	Report	NTU	Grab	Quarterly
Nitrogen, Total	Report	mg/L	Grab	Quarterly

Corrective Action: Please submit Part D ground water monitoring reports for 3rd and 4th Quarter 2019 and 1st and 2nd Quarter 2020.

13. ♦SSO Survey: In-Compliance

13.1 Observation: At the time of inspection there have been no sanitary sewer overflows from June 1, 2019 to June 30, 2020.

14. Other: Not Applicable

ATTACHMENT C

Compliance Historical Documentation



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

February 5, 2021

Charles DeMenzes, President
Tradewinds Utilities Inc.
2925 NE 43rd Pl
Ocala, Florida 34478
charlie@altfo.com

Re: Tradewinds WWTF
DW Facility ID #FLA010699
OGC Case No: 20-1413
Marion County

Dear Mr. DeMenzes:

Enclosed is a Consent Order ("Order") prepared by the Department for resolution of the referenced enforcement case. Please review this document and within 10 days of receipt, either: 1) return a signed copy to the Department or 2) provide comments and suggested changes. Once fully executed, a copy of the final document will be forwarded to you.

Should you have any questions or comments, please contact Carolyn Hall at 407-897-4114 or via e-mail at Carolyn.X.Hall@FloridaDEP.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Watkins".

Aaron Watkins, Director
Central District

Enclosure: Consent Order

cc: utilitiesmanagementteam@gmail.com

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE OF FLORIDA DEPARTMENT)	IN THE OFFICE OF THE
OF ENVIRONMENTAL PROTECTION)	CENTRAL DISTRICT
)	
v.)	OGC FILE NO. 20-1413
)	
TRADEWINDS UTILITIES, INC)	
_____)	

CONSENT ORDER

This Consent Order (“Order”) is entered into between the State of Florida Department of Environmental Protection (“Department”) and Tradewinds Utilities Inc (“Respondent”) to reach settlement of certain matters at issue between the Department and Respondent.

The Department finds and Respondent admits the following:

1. The Department is the administrative agency of the State of Florida having the power and duty to protect Florida’s air and water resources and to administer and enforce the provisions of Chapter 403, Florida Statutes (“F.S.”), and the rules promulgated and authorized in Title 62, Florida Administrative Code (“F.A.C.”). The Department has jurisdiction over the matters addressed in this Order.
2. Respondent is a person within the meaning of Section 403.031(5), F.S.
3. Respondent is the owner and is responsible for the operation of the Tradewinds WWTF, an existing 0.081 million gallon day (mgd) annual average daily flow (AADF) permitted capacity extended aeration domestic wastewater treatment plant (a 0.065 mgd plant in parallel with a 0.050 mgd plant) consisting of flow equalization, aeration, secondary clarification, chlorination, and aerobic digestion of biosolids with existing 0.081 MGD annual average daily flow permitted capacity slow-rate restricted public access reuse system. R-001 consists of a three-day clay-lined holding pond and a 2.34-acre sprayfield (“Facility”). The Facility is operated under Wastewater Permit No. FLA010699 (“Permit”), which was issued on December 22, 2015 and will expire on December 21,2020. The Facility is located at 2925 NE 43rd Place, Ocala, in Marion County, Florida, Latitude: 29°13' 54.37" North, Longitude: 82°5' 48.28" West, Parcel: 15845-

000-02, 15845-000-00 ("Property"). Respondent owns the Property on which the Facility is located.

4. The department finds that the following violation(s) occurred:

a) During an inspection on July 14, 2020 the sprayfield has several missing spray heads affecting the even loading of the sprayfield, which is a violation of Chapter 62-620.610(7) F.A.C.

b) During an inspection on July 14, 2020 the clay lined holding pond was not maintained which is a violation of Chapter 62-610.523 (6) F.A.C.

c) The facility has chronic effluent violations that generated a significant out of compliance with TSS limits exceeding five out of six months, which is a violation of Chapter 62-610.420 (b) F.A.C.

d) The facility is not meeting the requirements of Administrative Order AO-SS-16-016. The biannual status reports are not being submitted and do not accurately address the facilities ability to meet new Total Nitrogen limits currently not being met. This is a violation of Section 403.161 (1)(b) F.S.

Having reached a resolution of the matter Respondent and the Department mutually agree and it is

ORDERED:

5. Respondent shall comply with the following corrective actions within the stated time periods:

a) Effective immediately, the Respondent shall continue to monitor the sprayfield and maintain the spray heads until connection to Marion County Utilities is complete.

b) Effective immediately, the Respondent shall continue to maintain all vegetation from the holding pond to maintain storage capacity until connection to Marion County Utilities is complete.

c) Respondent shall comply with the interim limit ("Interim Limit"), the discharge monitoring, and reporting requirements in the table below for discharges to the

sprayfield system at the Facility. All of the other parameter limits in the Permit remain the same and Respondent shall comply with all of the other conditions of the Permit. The Interim Limit shall become effective upon the first day of the month following the effective date of this Consent Order. The Interim Limit shall remain in effect until December 31, 2022.

Parameter	Units	Max./ Min	Reclaimed Water Limitations		Monitoring Requirements			Notes
			Limit	Statistical Basis	Frequency of Analysis	Sample Type	Monitoring Site Number	
Solids, Total Suspended	mg/L	Max Max Max Max	33.0 45.0 55.0 70.0	Annual Average Monthly Average Weekly Average Single Sample	Monthly	Grab	EFA-1	
Nitrogen, Nitrate, Total (as N)	mg/L	Max	18.0	Annual Average	Annually	Grab	EFA-1	See I. Error ! Reference source not found. 6
Nitrogen, Total	mg/L	Max Max	Report Report	Annual Average Monthly Average	Monthly	Grab	EFA-1	See I. Error ! Reference source not found. 7

6. Within 30 days of the effective date of this Order, Respondent shall retain the services of a professional engineer, registered in the State of Florida, to accomplish all of the following:

- a) Designing modifications of the Facility collection systems to connect to Marion County Utilities Regional/ transmission System.

- b) Completing an application for a Department wastewater permit to construct the modifications listed in subparagraph (a).
- c) Overseeing the construction of the modifications to the Facility, effluent disposal system, or collection system.
- d) Submitting to the Department a Certification of Completion, prepared and sealed by a professional engineer registered in the State of Florida, stating that modifications to the Facility, effluent disposal system, and collection system have been constructed in accordance with the provisions of the Permit.
- e) In the event the Department requires additional information to process the permit application described in subparagraph (c) of this paragraph, providing a written response containing the information requested by the Department within 90 days of the date of the request.

7. Within 60 days of the effective date of the Order, Respondent shall submit to the Department an Abandonment Plan for the facility and the effluent disposal system. Proper abandonment includes pumping the plant dry, disinfection of the plant's components, disconnecting the force mains, disconnecting the electrical systems, ensuring that water does not collect in the plant, removal of the plant, removing the drain plugs or installing permanent drains which will ensure that water does not collect in the plant. If the plant is to be demolished on-site, the bottom pad needs to be broken in pieces to provide percolation. All sludge and debris shall be disposed at an approved site.

8. Within 400 days of the effective date of this Order, Respondent shall complete the proper abandonment of the facility and the effluent disposal system.

9. Every calendar quarter after the effective date of this Order, Respondent shall submit in writing to the Department a report containing information concerning the status and progress of projects being completed under this Order, information as to compliance or noncompliance with the applicable requirements of this Order including construction requirements and effluent limitations, and any reasons for noncompliance. These reports shall also include a projection of the work to be performed pursuant to this Order during the 12-

month period which will follow the report. These reports shall be submitted to the Department within 30 days following the end of the quarter.

10. Notwithstanding the time periods described in the paragraphs above, Respondent shall complete all corrective actions required by paragraphs 5 and 6 within 400 days of the effective date of this order or the current applicable Wastewater Permit expiration date (whichever comes first), and be in full compliance with Rule 62-600, F.A.C., regardless of any intervening events or alternative time frames imposed in this Order.

11. Within 30 days of the effective date of this Order, Respondent shall pay the Department \$2,250.00 in settlement of the regulatory matters addressed in this Order. This amount includes \$2,000.00 for civil penalties and \$250.00 for costs and expenses incurred by the Department during the investigation of this matter and the preparation and tracking of this Order. The civil penalty in this case includes 1 violation that each warrant a penalty of \$2,000.00 or more.

12. Respondent agrees to pay the Department stipulated penalties in the amount of \$1000.00 per day for each and every day Respondent fails to timely comply with any of the requirements of paragraphs 5 and 6 of this Order. The Department may demand stipulated penalties at any time after violations occur. Respondent shall pay stipulated penalties owed within 30 days of the Department's issuance of written demand for payment and shall do so as further described in paragraphs 10 and 11, below. Nothing in this paragraph shall prevent the Department from filing suit to specifically enforce any terms of this Order. Any stipulated penalties assessed under this paragraph shall be in addition to the civil penalties agreed to in paragraph # of this Order.

13. Respondent shall make all payments required by this Order by cashier's check, money order or on-line payment. Cashier's check or money order shall be made payable to the "Department of Environmental Protection" and shall include both the OGC number assigned to this Order and the notation "Water Quality Assurance Trust Fund." Online payments by e-check can be made by going to the DEP Business Portal at:

<http://www.fldeportal.com/go/pay/>. It will take a number of days after this order is final and effective filed with the Clerk of the Department before ability to make online payment is available.

14. Except as otherwise provided, all submittals and payments required by this Order shall be sent to Compliance Assurance Program, Department of Environmental Protection, Central District, 3319 Maguire Blvd., Suite 232, Orlando, FL 32803-3767 or by email at DEP_CD@dep.state.fl.us.

15. Respondent shall allow all authorized representatives of the Department access to the Facility and the Property at reasonable times for the purpose of determining compliance with the terms of this Order and the rules and statutes administered by the Department.

16. In the event of a sale or conveyance of the Facility or of the Property upon which the Facility is located, if all of the requirements of this Order have not been fully satisfied, Respondent shall, at least 30 days prior to the sale or conveyance of the Facility or Property, (a) notify the Department of such sale or conveyance, (b) provide the name and address of the purchaser, operator, or person(s) in control of the Facility, and (c) provide a copy of this Order with all attachments to the purchaser, operator, or person(s) in control of the Facility. The sale or conveyance of the Facility or the Property does not relieve Respondent of the obligations imposed in this Order.

17. If any event, including administrative or judicial challenges by third parties unrelated to Respondent, occurs which causes delay or the reasonable likelihood of delay in complying with the requirements of this Order, Respondent shall have the burden of proving the delay was or will be caused by circumstances beyond the reasonable control of Respondent and could not have been or cannot be overcome by Respondent's due diligence. Neither economic circumstances nor the failure of a contractor, subcontractor, materialman, or other agent (collectively referred to as "contractor") to whom responsibility for performance is delegated to meet contractually imposed deadlines shall be considered circumstances beyond the control of Respondent (unless the cause of the contractor's late performance was also beyond the contractor's control). Upon occurrence of an event causing delay, or upon

becoming aware of a potential for delay, Respondent shall notify the Department by the next working day and shall, within seven calendar days notify the Department in writing of (a) the anticipated length and cause of the delay, (b) the measures taken or to be taken to prevent or minimize the delay, and (c) the timetable by which Respondent intends to implement these measures. If the parties can agree that the delay or anticipated delay has been or will be caused by circumstances beyond the reasonable control of Respondent, the time for performance hereunder shall be extended. The agreement to extend compliance must identify the provision or provisions extended, the new compliance date or dates, and the additional measures Respondent must take to avoid or minimize the delay, if any. Failure of Respondent to comply with the notice requirements of this paragraph in a timely manner constitutes a waiver of Respondent's right to request an extension of time for compliance for those circumstances.

18. The Department, for and in consideration of the complete and timely performance by Respondent of all the obligations agreed to in this Order, hereby conditionally waives its right to seek judicial imposition of damages or civil penalties for the violations described above up to the date of the filing of this Order. This waiver is conditioned upon Respondent's complete compliance with all of the terms of this Order.

19. This Order is a settlement of the Department's civil and administrative authority arising under Florida law to resolve the matters addressed herein. This Order is not a settlement of any criminal liabilities which may arise under Florida law, nor is it a settlement of any violation which may be prosecuted criminally or civilly under federal law. Entry of this Order does not relieve Respondent of the need to comply with applicable federal, state, or local laws, rules, or ordinances.

20. The Department hereby expressly reserves the right to initiate appropriate legal action to address any violations of statutes or rules administered by the Department that are not specifically resolved by this Order.

21. Respondent is fully aware that a violation of the terms of this Order may subject Respondent to judicial imposition of damages, civil penalties up to \$10,000.00 per day per violation, and criminal penalties.

22. Respondent acknowledges and waives its right to an administrative hearing pursuant to sections 120.569 and 120.57, F.S., on the terms of this Order. Respondent also acknowledges and waives its right to appeal the terms of this Order pursuant to section 120.68, F.S.

23. Electronic signatures or other versions of the parties' signatures, such as .pdf or facsimile, shall be valid and have the same force and effect as originals. No modifications of the terms of this Order will be effective until reduced to writing, executed by both Respondent and the Department, and filed with the clerk of the Department.

24. The terms and conditions set forth in this Order may be enforced in a court of competent jurisdiction pursuant to sections 120.69 and 403.121, F.S. Failure to comply with the terms of this Order constitutes a violation of section 403.161(1)(b), F.S.

25. This Consent Order is a final order of the Department pursuant to section 120.52(7), F.S., and it is final and effective on the date filed with the Clerk of the Department unless a Petition for Administrative Hearing is filed in accordance with Chapter 120, F.S. Upon the timely filing of a petition, this Consent Order will not be effective until further order of the Department.

Persons who are not parties to this Consent Order, but whose substantial interests are affected by it, have a right to petition for an administrative hearing under sections 120.569 and 120.57, Florida Statutes. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition concerning this Consent Order means that the Department's final action may be different from the position it has taken in the Consent Order.

The petition for administrative hearing must contain all of the following information:

- a) The OGC Number assigned to this Consent Order;
- b) The name, address, and telephone number of each petitioner; the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding;
- c) An explanation of how the petitioner's substantial interests will be affected by the Consent Order;

- d) A statement of when and how the petitioner received notice of the Consent Order;
- e) Either a statement of all material facts disputed by the petitioner or a statement that the petitioner does not dispute any material facts;
- f) A statement of the specific facts the petitioner contends warrant reversal or modification of the Consent Order;
- g) A statement of the rules or statutes the petitioner contends require reversal or modification of the Consent Order; and
- h) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the Department to take with respect to the Consent Order.

The petition must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS# 35, Tallahassee, Florida 32399-3000 within 21 days of receipt of this notice. A copy of the petition must also be mailed at the time of filing to the District Office at Central District, 3319 Maguire Blvd., Orlando, FL 32803. Failure to file a petition within the 21-day period constitutes a person's waiver of the right to request an administrative hearing and to participate as a party to this proceeding under sections 120.569 and 120.57, Florida Statutes. Before the deadline for filing a petition, a person whose substantial interests are affected by this Consent Order may choose to pursue mediation as an alternative remedy under section 120.573, Florida Statutes. Choosing mediation will not adversely affect such person's right to request an administrative hearing if mediation does not result in a settlement. Additional information about mediation is provided in section 120.573, Florida Statutes and Rule 62-110.106(12), Florida Administrative Code.

26. Rules referenced in this Order are available at

<https://softlive.dep.state.fl.us/ogc/ogc/content/rules>

FOR THE RESPONDENT:

Charles Demenzes
Owner of Tradewinds Utilities Inc.

Date

DONE AND ORDERED this ___ day of _____, 2021, in Orange County, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Aaron Watkins
District Director
Central District

Filed, on this date, pursuant to section 120.52, F.S., with the designated Department Clerk,
receipt of which is hereby acknowledged.

Clerk

Date

Copies furnished to:

Lea Crandall, Agency Clerk
Mail Station 35

ATTACHMENT D

Agreements with Surrounding Utilities



December 2, 2021
AEI Project No. APGW-21-108

TO: SJRWMD Bureau of Water Use Permitting
4049 Reid Street
PO Box 1129
Palatka, FL 32178-1429

Attn: Rich Burklew, Manager, Water Use Permit Reviewer

SUBJECT: Modification Application
Consumptive Use Permit (CUP) No. No. 2995-6
Tradewinds Utilities, Inc.
Marion County, Florida

Dear Mr. Burklew:

Andreyev Engineering, Inc. (AEI) is providing a modification application for CUP No. 2995-6 for Tradewinds Utilities, Inc. The request for modification is for an increase in the currently permitted withdrawal rates, to supply wholesale water quantities to Marion County Utilities for supply of a proposed development, namely Millwood Estates. This application includes the following:

1. **Attachment A** - Application forms – Cup Application form and Public Supply Supplemental form;
2. **Attachment B** - Wholesale Water Agreement – between Tradewinds Utilities, Inc. and Marion County Utilities;
3. **Attachment C** – Aerial Property and Well Map;
4. **Attachment D** - Pumping Report Analysis, and Tables A, B and C;
5. **Attachment E** – Millwood Development Growth Rate Analysis;
6. **Attachment F** - Current Tradewinds Utilities, Inc. Rate Structure;
7. **Attachment G** – FDEP Water Treatment Plant Inspection Report;
8. **Attachment H** - Impact Analysis and Predicted Drawdown Contour Maps.

The developer for the Millwood Estates development is projecting, based upon their market analysis, that the development will be built-out and inhabited within 5 years or by the end of 2027. The wholesale agreement is for 200,000 gpd, included in **Attachment B**, will be enough to supply the single-family residential development for that time period from the Tradewinds Utilities, Inc. CUP. Tradewinds Utilities, Inc. has enough pumping capacity, namely 1,368,000 gpd from ID 3, and 532,800 gpd from both standby wells, ID Nos. 1 and 2, to supply this wholesale water amount. Please see **Attachment E** for the specific growth rate analysis for the proposed Millwood Estates Development and **Attachment D** for the total Tradewinds Utilities, Inc. projected withdrawal tables. Please see **Attachment F** for the current Tradewinds Utilities, Inc. rate structure to demonstrate current water conservation efforts. Please see **Attachment G** for the FDEP Water Treatment Plant Inspection Report.

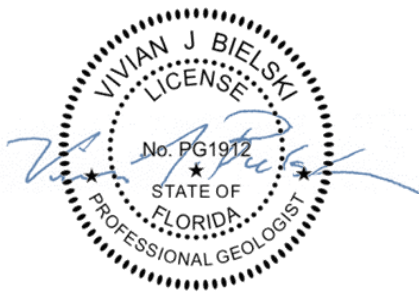
Based upon the Impact Analysis included in **Attachment H**, there will be no significant impacts to area surface water features, groundwater wells, and springs.

Modification of CUP 2995-6
Tradewinds Utilities, Inc.
December 2, 2021
Page 2

Thank you for your consideration of this modification application. If you have any questions or concerns regarding this response, please contact the undersigned by email at vbielski@andreyevengineering.com or by phone at (727) 224-3983.

Sincerely,

ANDREYEV ENGINEERING, INC.



12/2/2021

Vivian J. Bielski, P.G.
Senior Project Geologist
Andreyev Engineering, Inc.

ec: Charlie deMenzes, Chris Armstrong, Jody Kirkman, Tim Brooker

ATTACHMENT A

Application Forms (2)



CONSUMPTIVE USE PERMIT APPLICATION



St. Johns River Water Management District

4049 Reid Street • P.O. Box 1429 • Palatka, FL 32178-1429 • (386) 329-4500
Application forms may also be submitted electronically at www.sjrwmd.com.

SECTION I – CONTACT INFORMATION

If necessary, attach additional sheets if there are multiple applicants, owners, agents, etc.

1. **APPLICANT** (Complete legal name in which permit should be issued)

NAME: Tradewinds Utilities, Inc.

If applicant is a business, provide a contact person: Charles deMenzes

ADDRESS: PO Box 5220

CITY, STATE, ZIP: Ocala, FL 34478

PHONE: (352) 622-4949

CELL PHONE: (_____) _____

EMAIL ADDRESS: charlie@altfo.com

Do you want all correspondence to be transmitted electronically to this email address? Yes No

Applicant is: Owner Lessee* Other (explain) _____

*Attach copy of current lease, or written authorization from property owner

2. **OWNER** (If different than applicant)

NAME: _____

ADDRESS: _____

CITY, STATE, ZIP: _____

PHONE: (_____) _____

CELL PHONE: (_____) _____

EMAIL ADDRESS: _____

3. **AGENT OR CONSULTANT** Address all correspondence to the person below? Yes No

NAME: Vivian J. Bielski, P.G.

COMPANY NAME (if applicable): Andreyev Engineering, Inc.

ADDRESS: 14338 Rialto Ave.

CITY, STATE, ZIP: Brooksville, FL 34613

PHONE: (_____) _____

CELL PHONE: (727) 224-3983

EMAIL ADDRESS: vbielski@andreyevengineering.com

4. **COMPLIANCE CONTACT** (Person responsible for ensuring that the permit conditions are met)

NAME: Same as Owner

ADDRESS: _____

CITY, STATE, ZIP: _____

PHONE: (_____) _____

CELL PHONE: (_____) _____

EMAIL ADDRESS: _____

SECTION II – APPLICATION INFORMATION

For permit application guidance, please refer to the Applicant's Handbook, Consumptive Uses of Water, which is incorporated by reference in Rule 40C-2.101(1)(a), F.A.C. (A.H.). Please complete all fields. Enter N/A for any fields that are not applicable.

1. **TYPE OF APPLICATION:** New Modification Renewal
 If this application is for a modification, please describe the modification request and the reason the modification is necessary. To include a wholesale supply quantity to Marion County Utilities
2. **CONSUMPTIVE USE PERMIT NO.** (if application is for renewal or modification): 2995-6
3. **REQUESTED PERMIT DURATION:** 20 years Exp years (up to 20 years)
 This project qualifies for a duration greater than 20 years, per Section 373.236, F.S.
4. **PROJECT NAME:** Tradewinds Utilities **COUNTY:** Marion
PHYSICAL ADDRESS: Same as Owner
5. **RELATED PERMITS** (for projects other than Public Supply)
 - ENVIRONMENTAL RESOURCE PERMIT: MSSW/ERP No(s): _____
 - INDUSTRIAL WASTEWATER (IWW) PERMIT: IWW Permit No(s): _____
 - NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT:
 NPDES Permit No(s): _____

SECTION III – USE TYPE CATEGORIES

Please check all applicable use categories associated with this application and complete the associated supplemental form(s) indicated. The **Minor Individual Supplemental Form** (Form No. 40C-2.900(2)) can be completed in lieu of Supplemental Forms A through G if all of the following criteria are met:

- Use is less than 100,000 gallons per day
- Withdrawal facilities (wells or pump intakes) are less than 8-inches diameter
- Combined withdrawal capacity is less than 1,000,000 gallons per day
- Use is not for Mining/Dewatering
- Use is for Public Supply where end users are not individually metered

Use Type Category	Supplemental Form
<input type="checkbox"/> Agricultural (e.g., crops, livestock, nursery, aquaculture, pasture)	Form A Form No. 40C-2.900(1)(a)
<input type="checkbox"/> Commercial / Industrial (e.g., service business, food and beverage production, cooling and heating, commercial attraction, manufacturing, chemical processing, power generation)	Form B Form No. 40C-2.900(1)(b)
<input type="checkbox"/> Landscape / Recreation (e.g., irrigation of parks, cemeteries, landscaped areas, golf courses, athletic fields, playgrounds)	Form C Form No. 40C-2.900(1)(c)
<input type="checkbox"/> Mining / Dewatering (e.g., water use or removal associated with construction or excavation)	Form D Form No. 40C-2.900(1)(d)
<input checked="" type="checkbox"/> Public Supply (e.g., public or privately owned potable water supply utility)	Form E Form No. 40C-2.900(1)(e)
<input type="checkbox"/> Environmental / Other (e.g., aquifer remediation, environmental enhancement, or the use of water for other purposes)	Form F Form No. 40C-2.900(1)(f)
<input type="checkbox"/> Institutional (e.g., hospital, university, military base, correctional facility)	Form G Form No. 40C-2.900(1)(g)

SECTION IV – SOURCES OF WATER
(please attach additional facility tables if necessary)

SUMMARY OF GROUNDWATER (WELL) FACILITIES

Site or Wellfield Name ¹	District ID (if available)	Florida Unique Well ID (if available)	Owner's Well Name	Capacity (gpm)	Pump Type ²	Casing Diameter (inches) ³	Casing Depth (feet)	Total Depth (feet)	Status ⁴ (include date if proposed)	Type of Water Use Accounting Method ⁵	Last Meter Check / Method Validation ⁶	Type of Water Use (refer to Section III)
Tradewinds Util	1	19078	1	250	Sub.	8	35	240	EX	Ganged Met		PS
Tradewinds Util	2	19079	2	150	Sub.	8	38	160	EX	Ganged w 1		PS
Tradewinds Util	3	19080	3	950	Sub.	12	35	240	EX	Meter		PS

- 1 If project consists of separate or non-contiguous pieces of property or wellfields
- 2 Centrifugal (impeller located above water level), submersible (pump set below water level), turbine (motor at ground surface that drives an impeller below water level), vacuum underdrain (typically used for dewatering), well point system (typically used for dewatering), or other (any pump that does not fall into one of the categories previously listed)
- 3 The casing diameter is defined as the largest permanent water-bearing casing of the well at land surface.
- 4 Active (currently in use), Inactive (capped, does not have power, or the connection to the water supply system has been severed), Abandoned (plugged and abandoned in accordance with 40C-3, Florida Administrative Code), or Proposed (include anticipated construction date)
- 5 Flow Meter, Time Clock / Pump Run Time, Hour Meter, Digital Electric Meter, Analog Electric Meter
- 6 Enter the date of the last flow meter accuracy check or alternative method validation

SUMMARY OF SURFACE WATER (PUMP) FACILITIES

Site Name ¹	District ID (if available)	Owner's Pump Name	Pump Capacity (gpm)	Pump Intake Diameter (inches)	Pump Type ²	Name of Surface Water Body	Type of Surface Water Body ³	Status ⁴ (include date if proposed)	Type of Water Use Accounting Method ⁵	Last Meter Check / Method Validation ⁶	Type of Water Use (refer to Section III)
N/A											

- 1 If project consists of separate or non-contiguous pieces of property or wellfields
- 2 Centrifugal (impeller located above water level), submersible (pump set below water level), turbine (motor at ground surface that drives an impeller below water level), hydraulic dredge pump (typically used for mining), hydraulic dewatering pump (typically used for construction or mining), other (any pump that does not fall into one of the categories previously listed)
- 3 Ditch/canal, lake/pond (natural), lake/pond (artificial), river/creek, spring, mining/borrow pit
- 4 Active (currently in use), Inactive (does not have power, or the connection to the water supply system has been severed), Proposed
- 5 Flow Meter, Time Clock / Pump Run Time, Hour Meter, Digital Electric Meter, Analog Electric Meter
- 6 Enter the date of the last flow meter accuracy check or alternative method validation

SUMMARY OF CONNECTION POINT FACILITIES

Connection points include locations where potable or non-potable water (including reclaimed water) purchased from a water supplier enters a project site.

Site Name ¹	District ID (if available)	Owner's Connection Point Name	Water Supplier Name ²	Type of Surface Water Body ³ (if applicable)	Status ⁴ (include date if proposed)	Type of Water Use Accounting Method ⁵	Last Meter Check / Method Validation ⁶	Type of Water Use (refer to Section III)

- 1 If project consists of separate or non-contiguous pieces of property or wellfields
- 2 Name of water supplier that provides water to the project through the connection point
- 3 Reclaimed water holding pond, stormwater management system
- 4 Active (currently in use), Inactive (the connection to the water supply system has been severed), Proposed
- 5 Flow Meter, Time Clock / Pump Run Time, Hour Meter, Digital Electric Meter, Analog Electric Meter
- 6 Enter the date of the last flow meter accuracy check or alternative method validation

**SECTION V –
USE OF LOWEST QUALITY WATER AND EVALUATION OF RECLAIMED WATER FEASIBILITY**

The applicant may be required to evaluate the feasibility of utilizing reclaimed water and/or other lower quality water sources. The feasibility analysis must be completed as outlined in Section 2.3.3(e), A.H.

SECTION VI – SUMMARY OF REQUESTED WATER USE

Summarize the requested water use from each supplemental form (Agricultural, Public Supply, Commercial / Industrial, etc.) in the table below. Provide projections for each source, at five-year intervals, for the requested permit duration. If the requested permit duration exceeds 20 years, please attach a supplemental sheet providing additional five-year projections for each source.

Year	Requested Amounts and Source(s) of Water				
	Source 1 Name ¹ <small>Upper Floridan</small> (mg ²)	Source 2 Name (mg ²)	Source 3 Name (mg ²)	Source 4 Name (mg ²)	Total Requested Water Use (mg ²)
Year 20 <u>35</u>	334,000				334,000
Year 20 <u> </u>					
Year 20 <u> </u>					
Year 20 <u> </u>					

¹ Provide the name of the water source. Examples include upper Floridan aquifer, stormwater pond, surficial aquifer, Davis Lake.
² Million gallons per year

SECTION VII – AQUIFER STORAGE AND RECOVERY *(complete if applicable)*

ASR Facility Name	Source of Stored Water ¹	Storage Aquifer Name	Recovery Water Destination	Projected Demand Average (mg ²)	Projected Demand Maximum (mg ²)	Projected Injected Average (mg ²)	Projected Injected Maximum (mg ²)
n/a							

¹ Aquifer name, surface water body, water treatment plant name.

Please describe any projected increases or decreases (from historical average) in the amounts stored or recovered.

SECTION VIII – IMPACT EVALUATION

When determining whether the permit applicant has provided reasonable assurances that the conditions for issuance in Rule 40C-2.301, F.A.C., are met, the District will consider the projected impacts of the proposed consumptive use on an individual and cumulative basis. In order to provide reasonable assurance, studies and/or impact evaluations may be required. Please refer to the Applicant’s Handbook for guidance regarding the impact evaluations and attach analyses, if applicable.

SECTION IX – APPLICANT CERTIFICATION

I certify that to the best of my knowledge and belief, all of the information provided on this form and in any attachment to it is correct. I also certify that I have legal authority to execute this application for the applicant and certify that the applicant will have sufficient legal authority to undertake the activities described herein. I understand that any material false statement in an application to continue, initiate, or modify a use, or any material false statement in any report or statement of fact required of the permittee, may result in revocation, in whole or in part, of the permit (Section 373.243(1), F.S.). With advance notice, I agree to provide St. Johns River Water Management District staff, with proper identification, entry to the project site for the purpose of performing analyses of the site for determining whether the conditions for issuance will be met. Further, if a permit is granted, I agree that, with advance notice, District staff with proper identification shall have permission to enter, inspect, collect samples, and take measurements of permitted facilities to determine compliance with the permit conditions and permitted plans and specifications.

(If applicable) I authorize Vivian J. Bielski, P.G. to act as my agent for permit application coordination.

<u>Charles DeMenzes</u> APPLICANT’S NAME <i>(print or type)</i>	<u><i>Charles DeMenzes</i></u> APPLICANT’S SIGNATURE	<u>12/2/2021</u> DATE
<u>Vivian J. Bielski, P.G.</u> AUTHORIZED AGENT’S NAME <i>(print or type)</i>	<u><i>Vivian J. Bielski</i></u> AUTHORIZED AGENT’S SIGNATURE	<u>12/2/2021</u> DATE

When an application that will be considered by the District’s Governing Board is complete, the applicant will be notified of the date of the hearing (Governing Board meeting) at which the application will be considered at least 14 days in advance. The Governing Board normally meets on the second Tuesday of the month.

SECTION X – APPLICANT CHECKLIST

The following items must be included with the permit application submittal:

- Proof of Property Control (e.g., deed, lease), if not already on file with the District
- Application Fee (refer to online fee schedule or Applicant’s Handbook)
- Location/Site Map
- Supplemental Form(s) and associated supporting information (e.g., maps, calculations)
- Water Conservation Plan



CONSUMPTIVE USE PERMIT

Public Supply – Form E



St. Johns River Water Management District

4049 Reid Street • P.O. Box 1429 • Palatka, FL 32178-1429 • (386) 329-4500
 Application forms may also be submitted electronically at www.sjrwmd.com.

SECTION E1 – SITE INFORMATION

1. Submit a map showing: [if available, provide items A through C in a District-approved electronic format, e.g. ESRI shapefile, AutoCAD, DXF, KMZ, or compatible GIS file]:
 - A. The Distribution Area boundary(ies) where service is currently being provided and where the utility is proposing to provide service during the permit duration;
 - B. The Authorized Water Service Area or Franchise Area boundary in which the utility is legally authorized to provide potable water service;
 - C. All existing and proposed withdrawal and connection point locations. Label all wells, pumps and connection points so they match the IDs provided in Section IV (Sources of Water) of the main application form (Form No. 40C-2.900(1), which is incorporated by reference in Rule 40C-2.900(1), F.A.C.);
 - D. A north arrow and map scale; and
 - E. Labeled landmarks such as major roads and political boundaries.

SECTION E2 – POPULATION AND PER CAPITA USE

1. Historical data must be provided for the previous five years (including the most recent calendar year) and projected use at a minimum of five-year intervals for the requested permit duration. If historical data has been previously submitted to the District to fulfill periodic reporting requirements, the historical data may be left blank.

	Year	Average Number of Active Residential Connections	Total Number of Residential Dwelling Units (if available)	Residential Population Served ¹	Residential Water Use Average Day (mgd)	Uniform Residential Per Capita Use ² (gpcd) ³
Historical	SEE	TABLE A				
Projected						

¹ Calculated as the Average Number of Active Residential Connections or Total Number of Residential Dwelling Units multiplied by the average number of persons per household.
² Calculated as Total Residential Water Use Average Day divided by Residential Population Served. Residential water use reflects finished water.
³ gpcd = gallons per capita per day

2. Please attach a description of the methodology used to estimate population. Include supporting calculations and describe any deviations from District-approved methods as outlined in the Applicant's Handbook.

SECTION E3 – WATER DEMAND COMPONENTS

1. Historical and Projected Water Demands.

If historical data has been previously submitted to the District to fulfill periodic reporting requirements, the historical data may be left blank. Projections must be provided at a minimum of five-year intervals for the requested permit duration.

Year	Residential Water Use Average Day (mgd) (from Section E2 above)	Commercial / Industrial / Institutional ¹ Average Day (mgd)	Recreation and Landscape Irrigation Average Day ² (mgd)	Routine Exports Average Day ³ (mgd)	Other ⁴ (describe) Average Day (mgd)	Water Utility ⁵ Average Day (mgd)	Water Losses ⁶ Average Day (mgd)	Water Treatment Reject ⁷ Average Day (mgd) (if applicable)	Annual Average Daily Raw Water Demand ⁸ (mgd)
Historical Water Demand	SEE	ATTACHED	TABLE B	Sub.		PS	240		
				8	Ganged w 1	Tradewinds	EX		
				35	EX	3	Meter		
				240	160	19080			
				EX	38	3	PS		
Projected Water Demand			Tradewinds	Ganged Met	8	950			
			1		Sub.	Sub.			
			19078	PS	150	12			
			1	Tradewinds	2	35			
			250	2	19079				

¹ Metered bulk industrial and commercial use including businesses, manufacturing facilities, and institutions such as schools and hospitals, including irrigation uses associated with these facilities whose irrigation source is provided by the utility.

² Use for irrigation of common areas such as parks, athletic fields, cemeteries, medians, and rights-of-way.

³ Water routinely supplied to other utilities through interconnections.

⁴ Examples of "Other" could include supplementation of a reclaimed water system, environmental restoration, or other uses not listed above.

⁵ Water used for line flushing, well lubrication, and other water system maintenance.

⁶ Water losses including leakage from transmission and storage facilities and other unknown water losses.

⁷ Reject water from treatment systems such as reverse osmosis

⁸ The annual average day raw water demand; should represent the sum of the columns to the left.

- Attach a description of the methodology used to develop projections for each column in the Projected Water Demands table above. Include supporting calculations and describe any deviations from District-approved methods as described in the Applicant's Handbook.

SECTION E4 – HISTORICAL AND REQUESTED WATER USE

1. Historical and Projected Water Supply Sources

Provide the historical and projected water supply from each source. Sources include any bulk water purchases or transfers. The sum of all sources should equal the Annual Average Daily Raw Water Demand.

	Year	Requested Amounts and Source(s) of Water (mgy)				
		Annual Average Daily Raw Water Demand (mgd) Section E3 Table 1	Source 1 Name ¹ _____ (mgy)	Source 2 Name _____ (mgy)	Source 3 Name _____ (mgy)	Source 4 Name _____ (mgy)
Historical Water Supply	SEE	ATTACHED	TABLE C			N/A
Projected Water Supply						

¹ Provide the name of the water source. Examples include upper Floridan aquifer, stormwater pond, surficial aquifer, Davis Lake

2. Wellfield Operation Schedule

Describe the typical wellfield operation schedule, including source and/or facility specific allocations if applicable. Identify which wells are primary, secondary (peaking), stand-by, and describe the well rotation schedule.

All wells are used equally and have a ganged meter.

SECTION E5 – REUSE FEASIBILITY

For public water supply utilities that operate a domestic wastewater treatment facility, please provide an analysis of the economic, environmental, and technological feasibility of making reclaimed water available or increasing reclaimed water availability for beneficial reuse. Pursuant to subsection 403.064(6), F.S., a reuse feasibility study prepared in accordance with subsection 403.064(2), F.S., satisfies the requirement to conduct a reuse feasibility study.

SECTION E6 – WATER CONSERVATION

1. CONSERVATION

Please attach a copy of the conservation plan, and include a copy of any water conservation ordinances related to the plan. If your facility is located in a Water Resource Caution Area, there may be additional water conservation requirements as described in section 2.2.2.5 of the Applicant's Handbook.

- A. Indicate whether the conservation program is a Standard Conservation Plan or a Goal-based Plan.
- Standard Conservation Plan Goal-based Plan
- B. Please attach a copy of the current water rate structure.

ATTACHMENT B

Wholesale Water Agreement

This instrument prepared by:
Marion County Utilities
Attn. Jody Kirkman
11800 SE US Highway 441
Bellevue, FL 34420

Record and Return to:
Marion County Utilities
Attn. Jody Kirkman
11800 SE US Highway 441
Bellevue, FL 34420

WHOLESALE WATER AND WASTEWATER SERVICE AGREEMENT

between

TRADEWINDS UTILITIES, INC.

and

MARION COUNTY, FLORIDA

For the exchange of MARION COUNTY Wastewater Service
and TRADEWINDS UTILITIES, INC. Water Service

This Wholesale Water and Wastewater Service Agreement (this "Agreement") is made and entered into by and between TRADEWINDS UTILITIES, INC., a Florida for profit corporation, with a principal address of 1552 SW 7th Rd., Ocala, FL 34471 and a mailing address of P.O. Box 5220, Ocala, FL 34478, (hereafter "COMPANY") and MARION COUNTY, a political subdivision of the State of Florida, with a principal address of 601 SE 25th Avenue, Ocala, FL 34471 (hereafter, "COUNTY") (singularly "Party," collectively "Parties.>").

WHEREAS, COMPANY is the owner of certain real property, a "package" sewage treatment plant, effluent disposal systems, gravity collection system, lift stations and force mains described herein, along with associated rights, permits and interests necessary to operate such facilities (collectively "COMPANY Facilities"), and same is operated by COMPANY to serve the area within COMPANY's Public Service Commission ("PSC") certificated wastewater service area in Marion County, Florida; and

WHEREAS, COMPANY also operates a privately owned water system selling to the public and located within its PSC certificated service area in Marion County, Florida; and

WHEREAS, COUNTY operates a public wastewater system as well as a public water system located in Marion County, Florida (hereafter, the "COUNTY's Wastewater System") and is engaged in the commercial provision of water and wastewater services to customers; and

WHEREAS, COMPANY has requested COUNTY take ownership of a certain portion of COMPANY Facilities, including certain real property; to replace the conveyed wastewater facilities with a master pump system ("MPS"); connect the MPS to COUNTY's central wastewater collection system; decommission the now defunct facilities; and to do so in such a manner as to allow COMPANY, throughout and thereafter, to continue to provide wastewater service its customers; and

WHEREAS, COUNTY is willing to accommodate COMPANY's request and agrees to accept the conveyance, perform the construction, and thereafter sell, on a wholesale basis, wastewater service capacity to COMPANY for COMPANY's provision of retail wastewater service within COMPANY's Florida Public Service Commission ("PSC") certificated service area (collectively the "Parties Wastewater Project"); and

WHEREAS, COUNTY has historically been unable to provide water services to customers in COMPANY's geographical area due to a lack of nearby infrastructure; and

WHEREAS, COUNTY has requested COMPANY facilitate COUNTY's ability to provide water services to customers in the geographical area but outside COMPANY's PSC certificated service area; and

WHEREAS, COMPANY is willing to accommodate COUNTY and agrees to provide wholesale water service capacity to COUNTY, that will enable COUNTY to provide water service outside COMPANY's PSC certificated service area, and COMPANY will continue to provide retail water service to its individual customers within its PSC certificated service area (collectively the "Parties Water Project"); and

WHEREAS, COUNTY has requested and COMPANY agrees to provide allow to connect the Armstrong Project known as ("Millwood Estates Project") to connect to its collector system; and

WHEREAS, COMPANY has requested and COUNTY agrees to pursue the acquisition and purchase of companies under mutual ownership, i.e., Tradewinds Utilities, Inc., C.F.A.T. H2O (a/k/a "Landfair"), and BFF Corp. private utility systems; and

WHEREAS, in performing the projects outlined above COUNTY and COMPANY are committed to compliance with all federal, state and local statutes, ordinances, rules and regulations governing water and wastewater systems and with the terms of this Agreement; and

WHEREAS, the wastewater system constructed by COUNTY will allow the Parties to fully participate in the Florida Department of Environmental Protection ("FDEP") Silver Springs Basin Management Action Plan ("BMAP") and support the overall goal of improving the water quality in the region by reducing nitrogen pollution within the springshed; and

WHEREAS, the Parties desire to enter into this Agreement to set forth their mutual understanding of the respective benefits and obligations in this project, with each offering the

other its covenant and agreement that it has the power to enter into this Agreement and same shall be effective upon the date of the last signature below (the "Effective Date").

NOW, THEREFORE, in consideration of the mutual covenants contained herein, and other good and valuable consideration, the sufficiency of which is hereby acknowledged, the Parties do hereby agree as follows:

ARTICLE I RECITALS

1. RECITALS.
COMPANY and COUNTY confirm and agree that the above Recitals are true and correct, and incorporate their terms and provisions herein for all purposes.

ARTICLE II PARTIES' WASTEWATER PROJECT

1. Contemporaneously with the Water Project described later herein, the Parties shall also be engaged in the Wastewater Project as set forth below and generally described as:
 - A. COMPANY shall convey certain property, including real property, to COUNTY;
 - B. COUNTY shall construct new wastewater facilities on the subject real property;
 - C. COUNTY shall thereafter connect COMPANY's existing wastewater system to the newly constructed facilities and then, in turn, connect all to COUNTY's central wastewater collection system;
 - D. COUNTY shall thereafter be responsible to provide wastewater services to COMPANY.

ARTICLE III COUNTY FACILITIES

1. CONVEYANCE
 - A. Conveyance Property.
As a condition precedent to COUNTY providing wastewater service to COMPANY, COMPANY shall convey to COUNTY at no cost, marketable title, free and clear of any and all liens and encumbrances, by deed or bill of sale the entirety of the Conveyance Property.
 - B. Conveyance Property is defined by the Parties to include the following items making up a portion of COMPANY's Facilities:
 1. Real property identified as Marion County Parcel Numbers 15840-000-02 and 15840-004-00, more fully described on Exhibit A hereto and sketch of same is provided on Exhibit B hereto (collectively the "Parcels");
 2. A portion of COMPANY's on-site wastewater facilities, including:
 - a. Sewage treatment plant;
 - b. On-site lift station;

- c. Effluent disposal system/property,
 - d. Any other tangible and intangible personal property, situated on the Parcels and used and useful by COMPANY to serve the Tradewinds Utilities, Inc. (the "Original Facilities").
3. Any and all engineering drawings, maps, surveys or other documents pertinent to the above.

C. **Free and Clear.**

COMPANY represents, warrants, certifies and assures that there are no liens or encumbrances on the Conveyance Property as of the Effective Date of this Agreement, and further that COMPANY will not permit any such liens or encumbrances to be filed against the Conveyance Property before the Closing and COUNTY's recordation of the deed to the Conveyance Property.

D. **No Capacity Fees.**

The transfer of the Conveyance Property shall be made in lieu of any obligation of COMPANY to pay wastewater capacity fees for the wastewater service provided hereunder.

E. **Closing.**

The closing for the Conveyance Property, shall take place at the office of the Marion County Utilities Division, 11800 SE US 441, Belleview, Florida, on or before February 1, 2021 (the "Closing").

2. **CONSTRUCTION.**

A. **Components of COUNTY Facilities.**

After taking ownership of all Conveyance Property, COUNTY shall, at its own expense, design, permit, and construct a new COUNTY- owned lift station to be built in accordance with Marion County Standards and to include a new force main, 4-inch magnetic wastewater flow meter, and ancillary facilities (collectively "COUNTY Facilities").

B. **Enabled for Wholesale Service.**

COUNTY Facilities shall take COMPANY's wastewater flows from the Tradewinds Utilities, Inc. site and convey those flows to COUNTY's Silver Springs Shores Wastewater Treatment Plant in order to provide wholesale wastewater treatment service to COMPANY.

C. **Decommissioning.**

Upon certification that COUNTY Facilities are operational and after completing the connection with COMPANY's on-site facilities, COUNTY shall, at its own expense, permit, abandon, demolish and remove the Original Facilities in accordance with applicable laws.

D. **Financing.**

COUNTY has received a State Grant from the Florida Department of Environmental Protection ("FDEP") providing funds to construct COUNTY

Facilities, to remove COMPANY's Original Facilities, and to place COMPANY's wastewater treatment package plant flows on COUNTY's central wastewater collection system, providing the required treatment to produce effluent that meets the requirements within the Silver Springs Basin.

ARTICLE IV
COUNTY WHOLESALE WASTEWATER SERVICE TO COMPANY

1. **SERVICE DURING CONSTRUCTION.**
 - A. **Timing**
 1. COUNTY expects to have COUNTY Facilities constructed and operational within four hundred (400) days following the Closing of the Conveyance Property.
 2. COUNTY shall provide forty five (45) days' advance written notice to COMPANY of the first date on which COUNTY's wholesale wastewater treatment service ("COUNTY Service") is available to COMPANY.
 - B. **License.**
 1. During construction of COUNTY Facilities, COUNTY hereby grants to COMPANY a one-time non-exclusive license to occupy and use the Conveyance Property in order to continue operating the existing wastewater treatment plant, on-site lift station, effluent disposal system and related facilities, so as to provide uninterrupted service to COMPANY's customers.
 2. This term of the license shall begin on the date of Closing and expire on the first date COUNTY Service is made available to COMPANY (the "License Term").
 3. For the duration of the License Term, COMPANY shall be liable in all respects for the condition of the premises of the Conveyance Property, with the exception of that portion being occupied by COUNTY's construction activities.
 4. COMPANY shall further continue to be liable for any claims for any acts or omissions of its officers and employees arising out of COMPANY's operations or its use of the Conveyance Property during the License Term. Further COMPANY hereby releases and holds COUNTY harmless for any and all claims of damages related to the condition of and operation of the Conveyance Property under COMPANY's control and the acts and omissions of COMPANY's officers, employees, and agents in their use and operation of the Conveyance Property during the License Term.
 5. Both Parties agree to timely notify the other if any hazardous or dangerous conditions are observed on or about the Conveyance Property during the License Term.
2. **SERVICE AFTER CONSTRUCTION.**
 - A. **COUNTY Rates Subject to Adjustment.**
 1. COUNTY's wholesale wastewater service to COMPANY for the Tradewinds Development, and the terms of this Agreement, shall at all times be subject to applicable provisions for rates, fees and charges, as

well as the other requirements specified in the Marion County Code of Ordinances and related resolutions and the policies and procedures of COUNTY.

2. COMPANY acknowledges that it will be subject to COUNTY adjustments to its general wholesale rates that may occur from time to time based on its cost for providing wastewater service capacity.
3. COUNTY shall give COMPANY sixty (60) day advance notice of a public hearing for consideration of any proposed adjustment. The adjusted charges shall become effective not sooner than forty five (45) days after final approval by the Marion County Board of County Commissioners.
4. COMPANY shall thereafter pay such charges as adjusted. The monthly charge shall include a base charge and a usage charge.

B. Monthly Cost to COMPANY.

1. **Monthly Base Facility Charge.**

COMPANY agrees to pay COUNTY monthly for one (1) base facility (4-inch meter) charge at a rate of eighty percent (80%) of the charge identified in the approved COUNTY-wide wastewater base facility charge.

2. **Monthly Usage Rate.**

- A. COMPANY's usage shall be based upon the number of gallons of wastewater which pass through the 4-inch meter each month.
- B. The COUNTY rate shall be, subject to the adjustment set for the above, eighty percent (80%) of the commodity rate per 1,000 gallons of metered wastewater based on the approved COUNTY-wide wastewater service (gallage) rates.

C. Monthly Billing.

1. **Billing.**

- a. COUNTY agrees to bill COMPANY monthly.
- b. COUNTY agrees to read COMPANY's meter and submit meter readings to COMPANY on each monthly bill.

2. **Payments.**

- a. COMPANY agrees to pay COUNTY for all wastewater flow (gallons) COUNTY receives from COMPANY's wastewater system and agrees to timely make payments of all bills received by COUNTY.
- b. COMPANY shall be solely responsible to COUNTY for payment of the monthly bills.

D. The Meter.

1. COMPANY may read the meter at any time to confirm accuracy of the reading.
2. The metering equipment shall be owned and maintained by COUNTY and shall record flow with an error rate not to exceed plus or minus two-percent (2%) of the full-scale reading suitable for billing purposes.
3. The Parties agree that in the event any dispute arises concerning accuracy for the wastewater meter, that either Party may have the

wastewater meter tested by an independent testing company at such Party's own expense.

- a. If the meter is found to be in error exceeding two-percent (2%) of true accuracy, it shall be re-calibrated to the satisfaction of the Parties.
- b. If such error or more than two-percent (2%) is discovered, bills for one-half of the preceding period since the last meter check shall be adjusted to reflect the quantity of over read or under read exceeding two-percent (2%). In calculating such billing adjustments, it will be assumed that the meter inaccuracy existed for the entire time interval between meter accuracy checks by either Party, provided, however that any such time interval shall not exceed the twelve (12) months immediately preceding the date of the written notice of the inaccuracy. The volume used in the billing calculation shall be adjusted as described herein.

ARTICLE V

COMPANY'S CONTINUED RESPONSIBILITIES

1. **COMPANY'S FACILITIES.**

- A. COMPANY shall continue to own, maintain and operate all of its off-site gravity sewage collection system and force mains from the off-site sewage lift station(s) within the PSC Certificated Area to the Parcels. See outline of PSC Certificated Area on **Exhibit C** hereto.
- B. The off-site system shall continue to collect and pump sewage through the existing force main to the Original Facilities and, upon COUNTY Service, to COUNTY's new on-site lift station, via an existing lift station on the treatment plant site.

2. **COMPANY'S RETAIL SERVICES.**

The Parties agree that COMPANY shall continue to provide retail sewage collection service to its customers in accordance with generally accepted public water and wastewater utility industry standards and any specific requirements of the PSC. COUNTY shall not be liable for interruptions in service caused by any system problems occurring on COMPANY's side of the meter, or events not reasonable within COUNTY's control, including force majeure, acts of God, acts of terrorists or political insurrection, and the like.

3. **COOPERATION.**

COMPANY agrees to cooperate with COUNTY in the transfer to COUNTY of any permits as may exist relating to COMPANY's Sewage Treatment Plant.

4. **COMPANY WARRANTS.**

A. **Material Term.**

The Parties acknowledge and agree that the warrants, representations, certifications, and assurances of COMPANY are a material term of this Agreement and COUNTY affirmatively relies upon same as part of the consideration in entering into this Agreement.

- B. **Full Compliance.**
COMPANY warrants, represents, certifies and assures that its sewage collection system, manholes, mains and existing off-site lift station(s), the Conveyance Property, and all services it provides and has provided to its customers, comply with all applicable permits, laws, rules and ordinances as may apply to such property and services.
- C. **Shall Remain Liable.**
COMPANY shall remain liable for any and all fines, penalties, damages or other liability which may exist on or before the date of transfer of the Conveyance Property to COUNTY, whether such fines, penalty, damages or other liability have been identified or are known to COMPANY as of such conveyance date.
- D. **COUNTY Options to Terminate.**
1. **Immediate Termination.**
The Parties agree that COUNTY may terminate this Agreement at any time prior to Closing if any defects of any nature or type is identified by COUNTY.
 2. **Opportunity to Cure.**
 - a. If COUNTY discovers any title defects or environmental issues concerning the Conveyance Property before Closing, COUNTY shall immediately notify COMPANY.
 - b. Upon such notice, the Closing may, at COUNTY's option, be extended by not more than 14-days to afford COMPANY the opportunity to cure any defects and/or environmental issues.
 - b. If COMPANY is unable to cure the defect(s) COUNTY shall have the option to either:
 1. Take the Conveyance Property with such defect(s) or issues, or
 2. Terminate this Agreement without any further obligation or liability to COMPANY.

ARTICLE VI
THE PARTIES' WATER PROJECT

1. Contemporaneously with the Wastewater Project described above, the Parties shall be engaged in the Water Project set forth herein and generally described as COMPANY providing water services to COUNTY.

ARTICLE VII
COMPANY WHOLESALE WATER SERVICE TO COUNTY

1. **CAPACITY RESERVATION.**

COUNTY, in consideration of the payment of the fees and charges set forth below, shall have the right to reserve and utilize potable water capacity up to 200,000 GPD.

2. **CAPACITY CHARGES.**

Understanding that COUNTY is providing Bulk Wastewater Service to COMPANY where COUNTY accepted the Conveyance Property in lieu of wastewater Capacity Charges, COUNTY shall not be obligated to pay COMPANY's Capacity Charges, if any, to include any water main extension charge(s) for general service water reserved pursuant to this Agreement.

3. **BULK RATE CHARGES.**

A. **Components.**

COUNTY agrees that that the monthly charge shall include a base bulk charge and a usage charge as established by COMPANY's PSC approved rates.

B. **Bulk Base Rates.**

COUNTY agrees to pay COMPANY monthly usage rates for meter charge(s) at a rate of eighty percent (80%) of the charge identified in the approved COMPANY's usage rates.

C. **Bulk Usage Rate.**

The usage rate will be billed at 80% of the commodity rate per 1,000 gallons of metered water based on the approved COMPANY water service (gallage) rates.

4. **BILLING.**

A. COMPANY agrees to bill COUNTY monthly with the billing amount based upon the number of gallons of water which pass through the meter(s) each month.

B. COUNTY agrees to pay for all water flow (gallons) provided by COMPANY's water system and agrees to make payments to COMPANY within thirty (30) days from the date COUNTY's receipt thereof.

C. COUNTY shall be solely responsible to COMPANY for payment of the monthly bills.

D. COMPANY agrees to read the meter and submit meter readings to COUNTY on each monthly bill.

E. COUNTY may read the meter at any time to confirm accuracy of the reading.

5. **NOTIFICATION OF INTENT TO INTERCONNECT**

A. **Notice by COUNTY.**

COUNTY may exercise its right to interconnect COUNTY's facilities with COMPANY's facilities by submitting a notification letter to COMPANY in accordance with this Section and providing:

1. Its intent to exercise its right to interconnect COUNTY's facilities with COMPANY's facilities, and
2. Specification of the quantity of potable water capacity requested as expressed in Gallons Per Day ("GPD").

B. Verification by COMPANY.

1. Within thirty (30) days after the date COMPANY receives a notification letter from COUNTY pursuant to Section A above, COMPANY shall verify in writing its ability to provide the requested amount of potable water required by COUNTY and transmit such verification to COUNTY in accordance with Section A hereof. The verification letter transmitted to COUNTY shall specify or designate, as appropriate:
 1. The size of connection and water, water treatment capacity (expressed as average annual GPD) that COMPANY is able to provide to COUNTY,
 2. The PSC approved wholesale capacity charge, and
 3. Approximate availability date.

C. Shall Provide.

COMPANY shall provide the amount of water capacity requested by COUNTY as long as such amounts are within the limits provided by this Agreement.

D. Acceptance by COUNTY.

1. COUNTY shall signify its acceptance of the amounts of service and rates set forth in the verification letter submitted by COMPANY by submitting, in accordance with this Section, a binding letter of acceptance along with written plans and specifications for installation of the interconnection(s). Said acceptance letter and plans and specifications shall be submitted within thirty (30) days of the date of receipt of the verification issued by COMPANY pursuant to Section B above.
2. If COUNTY fails to accept the amounts of service and rates set forth in the verification letter submitted by COMPANY, then COMPANY shall be released from any and all obligation to provide any additional potable water service to COUNTY over and above the level of capacity existing prior to the delivery of the Notice by COUNTY contemplated by Section A above.
3. The plans and specifications shall be subject to the review and approval of COMPANY, which approval is subject to the terms herein and shall not be unreasonably withheld. COMPANY shall have one year from the later of:
 - a. The acceptance by COUNTY pursuant to this Section,
 - b. The approval of the plans and specifications by COMPANY, and
 - c. The obtaining of all permits necessary for the construction of the interconnect and the provision of water services pursuant this

Agreement, to commence providing water service described in the notice by COUNTY delivered pursuant to Section A.

- E. On acceptance by COUNTY, pursuant to Section D, an approval of the plans and specifications by COMPANY, COMPANY covenants to proceed with the due diligence to obtain all necessary permits.

6. **CONSTRUCTION OF THE INTERCONNECT.**

A. **Connection Costs.**

The costs associated with the water interconnection(s) of COUNTY's facilities to COMPANY's facilities will be shared by the Parties as follows:

1. **Construction of Interconnection Facilities** – COUNTY shall, at its own expense, provide all necessary pipelines, and necessary appurtenances so as to connect COUNTY's facilities with COMPANY's facilities as is necessary to receive the water service purchased in accordance with this Agreement. COUNTY, with COMPANY's approval, shall then be responsible for performing the work associated with making the physical interconnection(s). Title to the water passes between the Parties at the outlet flange of COMPANY's water meter. Each Party shall own, operate and maintain their portion of the system up to the Point of Connection.
2. **Easements and Rights-of-Way for Interconnection** – COUNTY shall be responsible for securing at its costs all necessary easements and right-of-way necessary for the interconnection outside of COMPANY's PSC Service Area. Within COMPANY's PSC Service Area, COMPANY shall be responsible for securing, at its cost, all necessary easements and rights-of-way to allow the construction and operation of the interconnection, subject to the rights and any existing easement holders. The location and configuration of all easements and rights-of-way shall be based on the shortest route reasonably possible which will both accommodate the interconnection design and the anticipated development of the property subject to the easement.
3. **Metering.**
 - a. **Share Costs.**

COUNTY and COMPANY shall share in the cost of providing metering equipment as further detailed below for billing purposes and such meters shall be uni-directional (i.e., one way) so as to avoid back flow.
 - b. **Property of COUNTY.**

Unless otherwise agreed in a letter agreement between the Parties, upon installation and acceptance, the metering equipment shall remain the property of COMPANY, and COMPANY shall be responsible for the operation, maintenance, and replacement of the meters, unless provided otherwise herein.

- c. **Water Meters.**
COUNTY shall provide at its cost one uni-directional meter for measurement of the water purchased by COUNTY under this Agreement. Such meter shall meet the standards of the American Water Works Association (AWWA) for quality and accuracy and shall be accurate to within (+/-) 2%.
 - d. **Meter Testing.**
COUNTY may request one accuracy test by COMPANY without charge at any time during any twelve (12) month period. COUNTY shall reimburse COMPANY for its actual costs of completing additional tests requested by COUNTY in that twelve (12) month period. Copies of the test results will be provided to COUNTY within thirty (30) days after completion of that test. If an inaccurate meter is found, as defined by the AWWA, bill adjustment will be made for one-half (1/2) of the preceding period since the last accuracy test.
 - e. **Meter Size and Location.**
The size of all meters shall be determined by COMPANY and shall be consistent with prudent water industry practices. The meter shall be located at COMPANY's facilities, or at such other location as mutually agreed upon by the Parties. In the event that the capacity of potable water purchased by COUNTY increases to a point that a larger meter than originally installed will be necessary, each Party will pay their cost of up-sizing the affected uni-directional flow meter(s).
4. **Permitting.**
Each Party shall obtain and maintain such permits as are necessary to operate their respective facilities. COMPANY shall obtain and maintain such consumptive water use permits as are necessary for COUNTY to consume the potable water reserved or purchased by COUNTY pursuant to this Agreement, and COUNTY shall provide to COMPANY such information as COMPANY reasonably requires to obtain and maintain such permits for the potable water reserved or purchased by COUNTY.
- B. **Commencement of Service.**
COMPANY shall not be obligated to commence providing service pursuant to this Agreement until thirty (30) days after the later to occur of the Service Date, and the completion of the Interconnect.
- C. **No Liability for Interruptions.**
COUNTY shall not be liable for interruptions in service caused by any system problems occurring on COMPANY's side of the meter, or events not reasonable within COUNTY's control, including force majeure, acts of God, acts of terrorists or political insurrection, and the like.

ARTICLE VIII
GENERAL TERMS

1. **AUTHORITY TO SIGN.**

COMPANY, and the signer of this Agreement on COMPANY's behalf, warrant and represent that the signatory to this Agreement, Charles DeMenzes, President of Tradewinds Utilities, Inc., is authorized to sign this Agreement on COMPANY's behalf.

2. **NOTICES.**

Any notices required by this Agreement shall be provided either by hand-delivery or U.S. Mail, certified delivery, return receipt requested, to the following addresses:

Mr. Jody C. Kirkman, P.E., Environmental Services Director
Marion County Utilities Department
11800 SE US Hwy 441
Belleview, Florida 34420

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

3. **TIME IS OF THE ESSENCE.**

Time is of the essence with respect to the performance of the Parties' obligations under this Agreement.

4. **INDEMNIFICATION.**

Up until the date of any conveyance to COUNTY of all water improvements and wastewater improvements, COMPANY will indemnify, save and hold harmless COUNTY against all liability, losses, damage or other expenses, including reasonable attorney's fees which may be imposed upon, incurred by or asserted against COUNTY by reason of any negligence on the part of COMPANY or its employees, agents, contractors, licensees or invitees; any personal injury or property damage occurring on or about the Conveyance Property or any part thereof; or any failure on the part of COMPANY to perform or comply with any covenant required to be performed or complied with, against COUNTY by reason of any such occurrences, COMPANY will, at COMPANY's expense, resist or defend any such action or proceeding. Provided further, however, COMPANY shall have no obligation with respect to claims arising out of the intentional or negligent conduct of COUNTY or its employees. The liability and immunity of COUNTY is governed by the provisions of §768.28, Florida Statutes (2009), and nothing in this Agreement is intended to extend the liability of COUNTY or to waive any immunity enjoyed by COUNTY under that statute. Any provisions of this Agreement determined to be contrary to §768.28 or to create any liability or waive any immunity except as specifically provided in §768.28 shall be considered void.

5. **FORCE MAJEURE.**

Neither Party shall be liable or responsible to the other by reason of one Party's failure or inability to take any action it is required to take or to comply with the requirements

imposed hereby for any injury to the other or by those claiming by or through the other, which failure, inability or injury is caused directly or indirectly by force majeure (as hereinafter set forth). The term "force majeure" as employed herein shall mean acts of god, strikes, lock outs, or other industrial disturbance; acts of public enemies, war, blockades, riots, acts of armed forces, militia, or public authority, epidemics, pandemics; breakdown of or damage to machinery, pumps, or pipe lines; landslides, earthquakes, fires, storms, floods, or washouts; arrests, title disputes, or other litigation; governmental restraints of any nature whether federal, state, county, municipal or otherwise, civil or military; civil disturbances; explosions, failure or inability to obtain necessary materials, supplies, labor or permits or governmental approvals whether resulting from or pursuant to existing or future rules, regulations, orders, laws or proclamations whether federal, state, county, municipal or otherwise, civil or military; or by any other causes, whether or not of the same kind as enumerated herein, not within the sole control of COUNTY and which by exercise of due diligence COUNTY is unable to overcome.

6. **PUBLIC RECORDS.**

Pursuant to the Florida Public Records Act, Chapter 119, Florida Statutes, all Parties are required to:

- A. Keep and maintain public records required by the public agency to perform the service.
- B. Upon request from the public agency's custodian of public records, provide the public agency with a copy of the requested records or allow the records to be inspected or copied within a reasonable time at a cost that does not exceed the cost provided in Chapter 119, Florida Statutes, or as otherwise provided by law.
- C. Ensure that public records that are confidential and exempt from public records disclosure requirements are not disclosed, except as authorized by law for the duration of the Agreement term and following completion of this Agreement records are not transferred to the public agency.
- D. Upon completion of the Agreement, transfer at no cost to the public agency, all public records in possession of the Party or keep and maintain public records required by the public agency to perform the service. If all public records are transferred to the public agency upon completion of the Agreement, the Party shall destroy any duplicate public records that are exempt or confidential and exempt from public records disclosure requirements. If Party keeps and maintains public records upon completion of the Agreement, Party shall meet all applicable requirements for retaining public records. All records stored electronically must be provided to the public agency, upon request from the public agency's custodian of public records, in a format that is compatible with the information technology systems of the public agency.
- E. **IF COMPANY HAS QUESTIONS REGARDING THE APPLICATION OF CHAPTER 119, FLORIDA STATUTES, TO TW'S DUTY TO PROVIDE PUBLIC RECORDS RELATING TO THIS AGREEMENT, CONTACT COUNTY'S CUSTODIAN OF PUBLIC RECORDS AT:**

Office of Public Information

601 SE 25th Ave., Ocala, FL 34471
Phone: 352-438-2300 Fax: 352-438-2309
Email: PIO@MarionCountyFL.org

7. **EFFECTIVE DATE.**

This Agreement shall become effective upon the execution of this Agreement by all Parties and recordation of the Agreement at COUNTY'S code in the Public Records of Marion County, Florida.

8. **SPECIAL CONDITIONS.**

A. Upon the execution of this Agreement, the Parties agree that COUNTY will initiate the evaluation process associated with the acquisition of Tradewinds Utilities, Inc., C.F.A.T. H₂O, and BFF Corp. ("Private Systems"). The Parties agree to negotiate a fair and acceptable purchase agreement where both Parties are in full agreement of the sale and purchase of the Private Systems.

B. **Millwood.**

1. **Development.**

The Millwood Estate Project ("Millwood") is a future development being planned outside COMPANY's PSC certificated area. COUNTY seeks to provide wastewater services to Millwood. However, due to the location of Millwood, COUNTY is not able to extend the needed infrastructure from COUNTY's Facilities to Millwood. However, if Millwood were to connect to COMPANY's off-site collection system, which ultimately connects to COUNTY's Facilities, COMPANY could act as a conduit allowing COUNTY to service Millwood.

2. **Costs.**

COMPANY agrees to facilitate and act as a conduit as long as it does not cost COMPANY. The Parties recognize that COUNTY's monthly bill to COMPANY includes a bulk rate usage fee based on the number of gallons of flow that COMPANY sends through COUNTY's Facilities. If Millwood were allowed to connect to COMPANY's off-site collection system, Millwood's flow would join with COMPANY's flow (the "Joinder") resulting in an increased number of gallons registering on COMPANY's meter. This increased meter reading would increase COMPANY's bill.

3. **Correction.**

To resolve this, the Parties agree to implement the following correction. COUNTY will, in addition to the aforementioned wastewater services, also provide Millwood water services. The Parties agree that at the end of each month COUNTY will add up the number of gallons of water COUNTY sold to Millwood that month. COUNTY will then perform a calculation to determine sixty percent (60%) of the total gallons of water

COUNTY sold Millwood that month. That resulting number of gallons will then be deducted from the number of gallons of wastewater actually sent by COMPANY to COUNTY's Facilities that same month (the "Correction").

4. **Full Satisfaction.**

COMPANY specifically agrees that:

- a. Millwood may be connected to COMPANY's off-site collection system;
- b. COMPANY will act as a conduit for Millwood's flow to reach COUNTY's Facilities;
- c. The Correction resulting in a reduced number of gallons charged to COMPANY for wastewater usage will fully offset the number of gallons that Millwood will add to COMPANY's flow; and
- d. The Correction will completely and satisfactory compensate COMPANY for the Joinder.

- C. COUNTY has been awarded a State Grant which is titled *Marion County Package Wastewater Plant Removal Program, Agreement No. LPS0021*. COUNTY will work with COMPANY to coordinate the central wastewater connection between COUNTY Facilities and COMPANY's on-site facilities to ultimately abandon COMPANY's Original Facilities. The Parties agree that COUNTY Facilities required to interconnect COMPANY's wastewater system to COUNTY's central wastewater system are contingent upon funding from the State Grant. Should the State Grant be terminated for any reason, COUNTY will be released from the obligation to construct COUNTY Facilities and would not be required to install the force main, lift station and ancillary equipment to support the wastewater interconnect.

9. **INDEPENDENT CONTRACTORS.**

The Parties deem each other to be Independent Contractors, and not agents of the other.

10. **E-VERIFY.**

Beginning January 1, 2021, Section 448.095, F.S., requires COMPANY to be registered and use the E-Verify system to verify the work authorization status of all newly hired employees and prohibits COMPANY from entering into this Agreement unless it is in compliance therewith. Information provided by COMPANY is subject to review for the most current version of the State or Federal policies at the time of the award of this Agreement.

- A. COUNTY hereby affirms it is duly registered, uses, and adheres to the practices of the E-Verify system, including those outlined in the clauses below.
- B. COMPANY has agreed to perform in accordance with the requirements of this Section and agrees:
 1. It is registered and uses the E-Verify system to verify work authorization status of all newly hired employees.
 2. COUNTY shall immediately terminate this Agreement if COUNTY has a good faith belief that COMPANY has knowingly violated Section

448.09(1), F.S., that is, that COMPANY knowingly employed, hired, recruited, or referred either for itself or on behalf of another, private or public employment within the State an alien who is not duly authorized to work by the immigration laws or the Attorney General of the United States.

3. When COMPANY enters into a contract with an employee, a contractor or a subcontractor COMPANY shall obtain from that contracting Party ("Contracting Party") an affidavit stating that the Contracting Party does not employ, contract with, or subcontract with an unauthorized alien.
4. COMPANY shall maintain a copy of such affidavit for the duration of this Agreement and provide it to COUNTY upon request.
5. COMPANY shall immediately terminate the Contracting Party if COMPANY has a good faith belief that the Contracting Party has knowingly violated Section 448.09(1), F.S., as set forth above.
6. If COUNTY has a good faith belief that COMPANY's Contracting Party has knowingly violated Section 448.09(1), F.S., but that COMPANY has otherwise complied, COUNTY shall promptly order COMPANY to terminate the Contracting Party. COMPANY agrees that upon such an order, COMPANY shall immediately terminate the Contracting Party. COMPANY agrees that if it should fail to comply with such an order, COUNTY shall immediately terminate COMPANY.
7. If COUNTY terminates this Agreement with COMPANY, COMPANY may not be awarded a public contract for a least one (1) year after the date of termination.
8. COMPANY is liable for any additional costs incurred by COUNTY as a result of a termination under this Section.
9. Any such termination under this Section is not a breach of this Agreement and may not be considered as such.
10. COMPANY shall maintain records of its registration, use, and compliance with the provisions of the E-Verify system, including the registration and use by its subcontractors, and to make such records available to COUNTY or other authorized governmental entity.
11. To comply with the terms of this Employment Eligibility Verification provision is made an express condition of this Agreement and COUNTY may treat a failure to comply as a material breach of this Agreement.

11. **SOVEREIGN IMMUNITY.**

Nothing in this Agreement shall be deemed to waive the sovereign immunity protections provided COUNTY pursuant to Florida law. Notwithstanding anything stated to the contrary in this Agreement, COUNTY's obligation to indemnify COMPANY is limited and shall not exceed the limits set forth in Section 768.28, Florida Statutes, as it may be amended from time to time. This Section shall survive the termination of this Agreement.

12. **INDEMNIFICATION.**

To the extent permitted by law, COMPANY shall indemnify, defend, and hold harmless, release, and forever discharge COUNTY and its officers, board members, employees, agents, and instrumentalities, from and against any and all fines, suits, claims, demands, penalties, liabilities, costs or expenses, losses settlements, judgments and awards and action of whatever kind or nature arising out of, relating to, or resulting from the performance of this Agreement, including a reasonable attorney's fees and costs (and a reasonable attorney's fee and costs on appeal) and damages (including, but not limited to, actual and consequential damages) arising from any negligent, willful or wrongful misconduct, knowing misrepresentation or breach of this Agreement by COMPANY, its employees, agents, or subcontractors, to the extent that any such claim, damages, loss, or expenses is caused by any acts or omissions of COMPANY or anyone directly or indirectly employed by COMPANY. COMPANY expressly understands and agrees that any insurance protection required by this Agreement or otherwise provided by COMPANY shall in no way limit the responsibility to indemnify, keep and save harmless and defend COUNTY and its officers, board members, employees, agents, and instrumentalities. This Section shall not be construed in any way to alter COUNTY's waiver of sovereign immunity or the limits established in Section 768.28, Florida Statutes.

13. **RIGHTS OF THIRD PARTIES.**

Nothing in this Agreement, whether express or implied, is intended to confer any rights or remedies under or because of this Agreement on any persons other than the Parties hereto and their respective legal representatives, successors and permitted assigns. Nothing in this Agreement is intended to relieve or discharge the obligation or liability of any third persons to any Party to this Agreement, nor shall any provision give any third persons any right of subrogation or action over or against any Party to this Agreement.

14. **WAIVER.**

No waiver or any default shall constitute a waiver of any other default or breach, whether of the same or other covenant or condition. No waiver, benefit, privilege, or service voluntarily given or performed by a Party shall give the other Party any contractual right by custom, estoppel, or otherwise.

15. **SEVERABILITY.**

If any provision of this Agreement shall be held to be invalid or unenforceable for any reason, the remaining provisions shall continue to be valid and enforceable. If a court finds that any provision of this Agreement is invalid or unenforceable, but that by limiting such provision it would become valid and enforceable, than such provision shall be deemed to be written, construed and enforced as so limited.

16. **APPLICABLE LAW/JURISDICTION/VENUE.**

This Agreement is being delivered in the State of Florida, and shall be construed and enforced in accordance with the laws of the State of Florida. The venue for any legal proceeding arising out of this Agreement, shall be Marion County, Florida.

17. **WAIVER OF JURY TRIAL.**

EACH PARTY HEREBY AGREES THAT IN ANY LITIGATION OR PROCEEDING, WHETHER AT LAW OR IN EQUITY, WHICH ARISES OUT OF THE AGREEMENT, WHETHER SOUNDING ON CONTRACT, TORT, STRICT LIABILITY, OR OTHERWISE, TRIAL SHALL BE HAD BY A COURT OF COMPETENT JURISDICTION AND NOT TO A JURY. EACH PARTY IRREVOCABLY WAIVES ANY RIGHT IT MAY HAVE TO A TRIAL BY JURY. EACH PARTY HAS READ AND UNDERSTANDS THE EFFECT OF THIS WAIVER.

18. **ENTIRE AGREEMENT.**

This Agreement, including exhibits, constitutes the entire agreement and understanding between the Parties with respect to the terms, conditions, representations and obligations recited herein, and any prior verbal or written understandings by and between the Parties are deemed to be merged herein and superseded by this Agreement. This Agreement may be amended by a writing of the Parties adopted by the same formalities as this Agreement.

19. **EFFECTIVE ONLY UPON PSC APPROVAL.**

This Agreement is subject to the jurisdiction of the Florida Public Service Commission and shall become effective only upon approval of the Florida Public Service Commission, COMPANY shall submit this Agreement to the Florida Public Service Commission for its approval within thirty (30) days of full execution.

[This portion of page intentionally left blank. Signature page follows.]

IN WITNESS WHEREOF, the said Parties have entered into this Agreement as of the date of the last signature below.

WITNESS: Signed before me:

TRADEWINDS UTILITIES, INC.

Teresa J. Felde 11/9/20
Signature Date
Teresa J. Felde
Print Name

By: [Signature]
Charles Demenzes
Its: President

Date: 11-9-2020

[Signature] 11-9-2020
Signature Date
Lyle R. Titterington
Print Name

STATE OF FLORIDA
COUNTY OF MARION

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this 9 day of Nov, 2020, by CHARLES DEMENZES as the President of **TRADEWINDS UTILITIES, INC.** a Florida for-profit corporation.
(SEAL)

[Signature]

Notary Public, State of Florida

Personally Known OR
 Produced Identification

Type of Identification Produced: FLOR DSS2-MD-36-271-



ATTEST:

MARION COUNTY, a political subdivision of the State of Florida

[Signature]
David R. Ellspermann
Clerk of Court
Date: November 17, 2020

By: [Signature]
Jeff Gold, Chairman
Date: November 17, 2020

For Reliance by Marion County Only, Approved as to Form and Legal Sufficiency:

[Signature]
E. Alt, Senior Assistant County Attorney

EXHIBIT A
LEGAL DESCRIPTION OF THE PARCELS

Parcel No. : 15840-000-02

SEC 34 TWP 14 RGE 22

Plat Book W Page 006

Trade winds village

BLK G LOT 14 & Tract B

AND

Parcel No. 15840-004-00

Spray field property

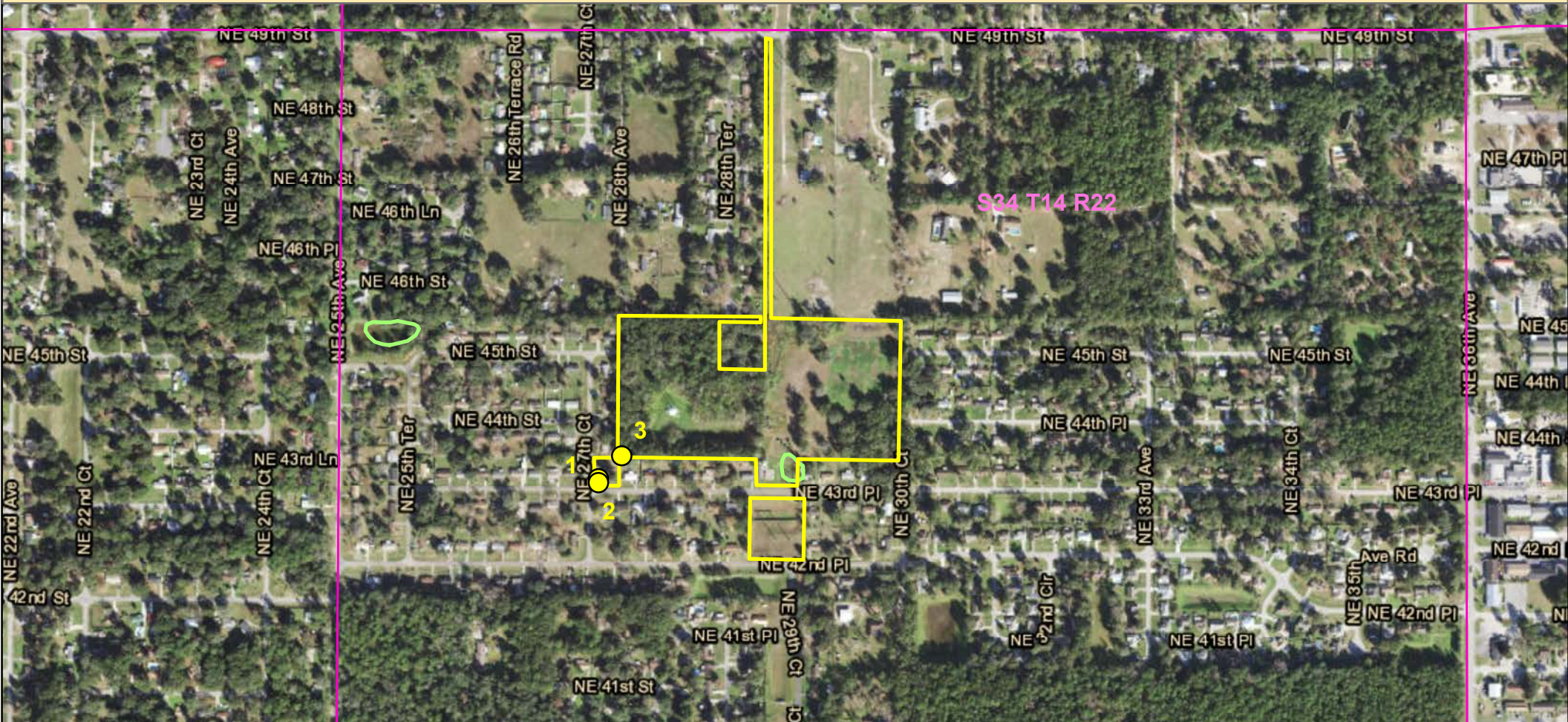
SEC 34 TWP 14 RGE 22

E ½ of N ½ of SE ¼ of NW ¼ EX W 40 ft of N 50 ft

ATTACHMENT C

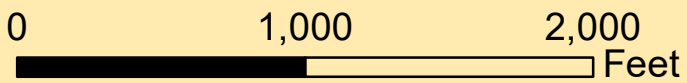
Aerial Property and Well Map

Property and Well Locations Tradewinds Utilities, Inc. CUP 2995-6 Modification Marion County

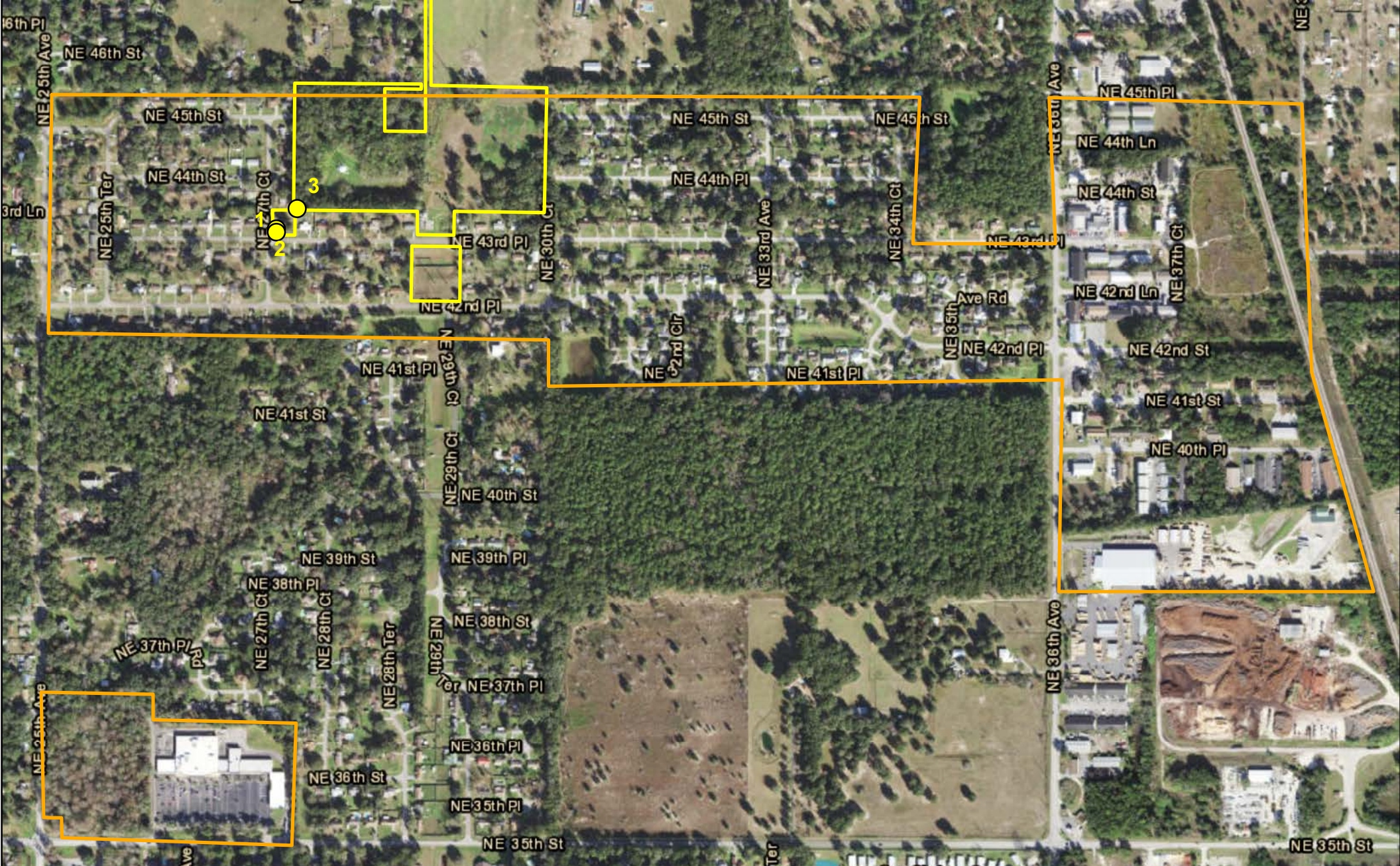


Legend

- Wells
- Property Boundary
- FL_Wetlands
- Section Township Range

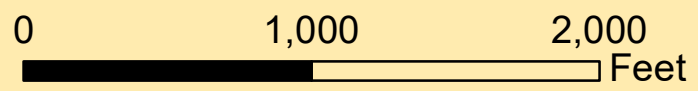


Drawn by VJB
11/9/2021



Legend

-  Service Area
-  Wells
-  Property Boundary




**Andreyev
Engineering, Inc.**

Drawn by VJB
9/8/2021

ATTACHMENT D

Pumping Report Analysis, and Tables A, B and C

CUP 2995-6 Modification
Tradewinds Utilities, Inc.

PUMPING REPORT ANALYSIS

MO/YR	MONTHLY PUMPING GAL	YEARLY TOTAL GAL	AN AVG DAY GPD
Jan-16	3179000		
Feb-16	2836000		
Mar-16	2928000		
Apr-16	3029000		
May-16	3842000		
Jun-16	2791000		
Jul-16	2814000		
Aug-16	2929000		
Sep-16	3892000		
Oct-16	4073000		
Nov-16	3874000		
Dec-16	4020000	40,207,000	110,156
Jan-17	3050000		
Feb-17	2319000		
Mar-17	2937000		
Apr-17	2929000		
May-17	2933000		
Jun-17	2297000		
Jul-17	2547000		
Aug-17	2119000		
Sep-17	2284000		
Oct-17	2393000		
Nov-17	3029000		
Dec-17	1724000	30,561,000	83,729
Jan-18	2863000		
Feb-18	2456000		
Mar-18	3831000		
Apr-18	2136000		
May-18	2074000		
Jun-18	1347000		
Jul-18	1626000		
Aug-18	2475000		
Sep-18	2930000		
Oct-18	2653000		
Nov-18	2076000		
Dec-18	2549000	29,015,000	79,493
Jan-19	2355000		
Feb-19	2533000		
Mar-19	2912000		
Apr-19	2624000		
May-19	3254000		
Jun-19	2420000		
Jul-19	3433000		
Aug-19	3638000		
Sep-19	2687000		
Oct-19	2428000		
Nov-19	2499000		
Dec-19	3092000	33,875,000	92,808
Jan-20	2542000		
Feb-20	2919000		
Mar-20	3691000		
Apr-20	2748000		
May-20	3560000		
Jun-20	3490000		
Jul-20	4646000		
Aug-20	3555000		
Sep-20	2990000		
Oct-20	2120000		
Nov-20	2413000		
Dec-20	2626000	37,309,000	102,216

CUP 2995-6 Modification
Tradewinds Utilities, Inc.

TABLE A ORIGINAL UTILITY SERVICE AREA ONLY RESIDENTIAL USE

% PER YEAR GROWTH	YEAR	AN # RES CONN	RES POP SERVED	RES USE AVG DAY GPD	UNIFORM RES PER CAPITA USE GPCD	5 YEAR AVG GPCD
	2016	536	1,179	58,425	49.55	
3.92	2017	557	1,225	56,460	46.07	
3.59	2018	577	1,269	54,672	43.07	
-2.43	2019	563	1,239	57,915	46.76	
5.15	2020	592	1,302	60,001	46.07	46.30364
5.20	2021	623	1,370	63,026	46.00	
5.20	2022	655	1,441	66,303	46.00	
5.20	2023	689	1,516	69,751	46.00	
5.20	2024	725	1,595	73,378	46.00	
5.20	2025	763	1,678	77,194	46.00	
5.20	2026	802	1,765	81,208	46.00	
5.20	2027	844	1,857	85,430	46.00	
5.20	2028	888	1,954	89,873	46.00	
5.20	2029	934	2,055	94,546	46.00	
5.20	2030	983	2,162	99,463	46.00	
5.20	2031	1,034	2,275	104,635	46.00	
5.20	2032	1,088	2,393	110,076	46.00	
5.20	2033	1,144	2,517	115,800	46.00	
5.20	2034	1,204	2,648	121,821	46.00	
5.20	2035	1,266	2,786	128,156	46.00	

POP. WITH WHOLESALE Q

PROJ WS POP	POP WITH WS POP	RES USE AVG DAY GPD
n/a		
n/a		
n/a		
n/a		
n/a		
n/a		
132	1,573	64,508
264	1,780	72,993
396	1,991	81,638
528	2,206	90,451
660	2,425	99,441
704	2,561	105,008
704	2,658	108,968
704	2,759	113,133
704	2,866	117,515
704	2,979	122,125
704	3,097	126,975
704	3,221	132,077
704	3,352	137,444
704	3,490	143,090

CUP 2995-6 Modification
Tradewinds Utilities, Inc.

TABLE B UTILITY SERVICE AREA AND EXPORT POPULATION INCLUDED

YEAR	RES USE MGD	COMM USE MGD	REC/L S USE MGD	EXPORTS AVG DAY MGD	UTIL USE AVG DAY MGD	UTIL LOSS AVG DAY MGD	TREAT. LOSS AVG DAY MGD	RAW WATER AVG DAY MGD
2016	0.058	0.020	0.0005	0	0.020	0.010	0.001	0.110
2017	0.056	0.018	0.0005	0	0.006	0.002	0.001	0.084
2018	0.055	0.018	0.0005	0	0.004	0.001	0.001	0.079
2019	0.058	0.018	0.0005	0	0.010	0.006	0.001	0.092
2020	0.060	0.015	0.0005	0	0.020	0.006	0.001	0.102
2021	0.063	0.019	0.000	0.000	0.016	0.005	0.001	0.105
2022	0.065	0.020	0.000	0.018	0.020	0.006	0.001	0.130
2023	0.073	0.020	0.000	0.036	0.026	0.008	0.001	0.164
2024	0.082	0.021	0.000	0.054	0.031	0.009	0.001	0.198
2025	0.090	0.021	0.000	0.072	0.037	0.011	0.001	0.233
2026	0.099	0.022	0.000	0.090	0.042	0.013	0.001	0.267
2027	0.105	0.022	0.000	0.096	0.045	0.013	0.001	0.282
2028	0.109	0.022	0.000	0.096	0.045	0.014	0.001	0.288
2029	0.113	0.023	0.000	0.096	0.046	0.014	0.001	0.294
2030	0.118	0.023	0.000	0.096	0.047	0.014	0.001	0.299
2031	0.122	0.024	0.000	0.096	0.048	0.015	0.001	0.306
2032	0.127	0.024	0.000	0.096	0.049	0.015	0.001	0.312
2033	0.132	0.024	0.000	0.096	0.051	0.015	0.001	0.319
2034	0.137	0.025	0.000	0.096	0.052	0.015	0.001	0.326
2035	0.143	0.025	0.000	0.096	0.053	0.016	0.001	0.334

PERCENT BASED UPON AUDITS

UTIL USE LOSS	%	%
18.13	9.07	
7.12	2.37	
5.08	1.27	
10.92	6.55	
19.53	5.86	

CUP 2995-6 Modification
Tradewinds Utilities, Inc.

TABLE C

YEAR	RAW WATER AVG DAY MGD	SOURCE NAME
2016	0.110	UP FL
2017	0.084	UP FL
2018	0.079	UP FL
2019	0.092	UP FL
2020	0.102	UP FL
2021	0.096	UP FL
2022	0.130	UP FL
2023	0.164	UP FL
2024	0.198	UP FL
2025	0.233	UP FL
2026	0.267	UP FL
2027	0.282	UP FL
2028	0.288	UP FL
2029	0.294	UP FL
2030	0.299	UP FL
2031	0.306	UP FL
2032	0.312	UP FL
2033	0.319	UP FL
2034	0.326	UP FL
2035	0.334	UP FL

ATTACHMENT E

Millwood Development Growth Rate Analysis

**Growth Calculations for the Proposed Development Millwood Estates
BUILD OUT OF 320 HOMES IS EXPECTED IN 6 YEARS**

YEAR	NO. OF HOMES	PERSONS PER HOME	PROJ. POP.	PER CAPITA USE RATE	AN AVG MGD
2022	60	2.2	132	120	0.016
2023	120	2.2	264	120	0.032
2024	180	2.2	396	120	0.048
2025	240	2.2	528	120	0.063
2026	300	2.2	660	120	0.079
2027	320	2.2	704	120	0.084

ATTACHMENT F

Current Tradewinds Utilities, Inc. Rate Structure

STATE OF FLORIDA

COMMISSIONERS:
GARY F. CLARK, CHAIRMAN
ART GRAHAM
ANDREW GILES FAY
MIKE LA ROSA
GABRIELLA PASSIDOMO



DIVISION OF ECONOMICS
JUDY HARLOW
DIRECTOR
(850) 413-6410

Public Service Commission

September 9, 2021

Mr. Charles de Menzes
Tradewinds Utilities, Inc.
Post Office Box 5220
Ocala, FL 34478-5220

WS-2021-0066

Re: Application for 2021 Price Index Rate Adjustment for Tradewinds Utilities, Inc. for water & wastewater in Marion County.

Dear Mr. de Menzes:

The following tariff sheets have been approved effective September 1, 2021:

Water Tariff

Sixth Revised Sheet No. 12.0
Sixth Revised Sheet No. 13.0

Wastewater Tariff

Sixth Revised Sheet No. 12.0
Sixth Revised Sheet No. 13.0

Please incorporate these tariff sheets into the approved tariffs on file at the utility's office. If you have any questions, please contact Malissa Bennett at (850) 413-6822 at our office.

Sincerely,

A handwritten signature in cursive script that reads "Judy D. Harlow".

Judy Harlow
Director

JH:js
Enclosures

GENERAL SERVICE

RATE SCHEDULE (GS)

AVAILABILITY - Available throughout the area served by the Company.
APPLICABILITY - For water service to all Customers for which no other schedule applies.
LIMITATIONS - Subject to all of the Rules and Regulations of this Tariff and General Rules and Regulations of the Commission.
BILLING PERIOD - Monthly

RATE -

<u>Meter Sizes</u>	<u>Base Facility Charge</u>
5/8" x 3/4"	\$ 10.30
1"	\$ 25.75
1 1/2"	\$ 51.50
2"	\$ 82.40
3"	\$ 164.80
4"	\$ 257.50
6"	\$ 515.00
8"	\$ 824.00
Charge per 1,000 gallons	\$ 4.15

MINIMUM CHARGE - Base Facility Charge
TERMS OF PAYMENT - Bills are due and payable when rendered. In accordance with Rule 25-30.320, Florida Administrative Code, if a Customer is delinquent in paying the bill for water service, service may then be discontinued.

EFFECTIVE DATE - September 1, 2021

TYPE OF FILING - 2021 Price Index

WS-2021-0066

CHARLES deMENZES
ISSUING OFFICER

PRESIDENT
TITLE

RESIDENTIAL SERVICE

RATE SCHEDULE (RS)

AVAILABILITY – Available throughout the area served by the Company.

APPLICABILITY – For water service for all purposes in private residences and individually metered apartment units.

LIMITATIONS – Subject to all of the Rules and Regulations of this Tariff and General Rules and Regulations of the Commission.

BILLING PERIOD – Monthly

RATE –

<u>Meter Sizes</u>	<u>Base Facility Charge</u>
5/8" x 3/4"	\$ 10.30
1"	\$ 25.75
1 1/2"	\$ 51.50
2"	\$ 82.40
3"	\$ 164.80
4"	\$ 257.50
6"	\$ 515.00
8"	\$ 824.00
Charge per 1,000 gallons	
0 – 5,000 gallons	\$ 3.45
5,001 – 10,000 gallons	\$ 5.20
Over 10,000 gallons	\$ 6.51

MINIMUM CHARGE – Base Facility Charge

TERMS OF PAYMENT – Bills are due and payable when rendered. In accordance with Rule 25-30.320, Florida Administrative Code, if a Customer is delinquent in paying the bill for water service, service may then be discontinued.

EFFECTIVE DATE – September 1, 2021

TYPE OF FILING – 2021 Price Index

GENERAL SERVICE

RATE SCHEDULE (GS)

- AVAILABILITY - Available throughout the area served by the Company.
- APPLICABILITY - For wastewater service to all Customers for which no other schedule applies.
- LIMITATIONS - Subject to all of the Rules and Regulations of this tariff and General Rules and Regulations of the Commission.
- BILLING PERIOD - Monthly

RATE -

<u>Meter Sizes</u>	<u>Base Facility Charge</u>
5/8" x 3/4"	\$ 24.07
1"	\$ 60.18
1 1/2"	\$ 120.35
2"	\$ 192.56
3"	\$ 385.12
4"	\$ 601.75
6"	\$ 1,203.50
8"	\$ 1,925.60
Charge per 1,000 gallons	\$ 7.71

- MINIMUM CHARGE - Base Facility Charge
- TERMS OF PAYMENT - Bills are due and payable when rendered. In accordance with Rule 25-30.320, Florida Administrative Code, if a Customer is delinquent in paying the bill for wastewater service, service may then be discontinued.

EFFECTIVE DATE - September 1, 2021

TYPE OF FILING - 2021 Price Index

RESIDENTIAL SERVICE

RATE SCHEDULE (RS)

AVAILABILITY - Available throughout the area served by the Company.

APPLICABILITY - For wastewater service for all purposes in private residences and individually metered apartment units.

LIMITATIONS - Subject to all of the Rules and Regulations of this Tariff and General Rules and Regulations of the Commission.

BILLING PERIOD - Monthly

RATE -

<u>Meter Sizes</u>	<u>Base Facility Charge</u>
All Meter Sizes	\$ 24.07
Charge per 1,000 gallons 10,000 gallon cap	\$ 6.43

MINIMUM CHARGE - Base Facility Charge

TERMS OF PAYMENT - Bills are due and payable when rendered. In accordance with Rule 25-30.320, Florida Administrative Code, if a Customer is delinquent in paying the bill for wastewater service, service may then be discontinued.

EFFECTIVE DATE - September 1, 2021

TYPE OF FILING - 2021 Price Index

WS-2021-0066

CHARLES deMENZES
ISSUING OFFICER

PRESIDENT
TITLE

ATTACHMENT G

FDEP Water Treatment Plant Inspection Report



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

June 10, 2020

Charles Demenzes, Owner
Tradewinds Utilities Inc.
NE 43rd Pl. & 27th Ct.
Ocala, FL 34478
charlie@altfo.com

Re: Tradewinds Village
PW Facility ID #3424620
Marion County

Dear Mr. Demenzes:

Department personnel conducted an inspection of the above-referenced facility on May 22, 2020. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Amada Fernandez at 407-897-4159 or via e-mail at Amada.M.Fernandez@FloridaDEP.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jill Farris".

Jill Farris, Manager
Central District
Florida Department of Environmental Protection

Enclosure: Inspection Report

cc: Amada Fernandez and Jill Farris, FDEP
UTILITIESMANAGEMENTTEAM@GMAIL.COM
Steve McGee, SMCGEE1953@YAHOO.COM

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 P.O. Box 5220, Ocala, FL 34478
Contact Person Charles Demenzes Title President Phone 352-622-4949
This Survey Date 5/22/20 Last Survey Date 7/13/17 Last Compliance Inspection Date 7/31/08

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 Plant

Comments _____

CERTIFIED OPERATOR: Yes

Operator(s) & Certification Class-Number:
Steve McGee C-1854

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

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

Non-consecutive Days? Yes No N/A

Comments *Visit must total 0.6 hr/week

MONTHLY OPERATION REPORTS (MORs)

MORs submitted regularly? Yes No N/A

Data missing from MORs? No Yes N/A

Average Day (from MORs) 91,640 gpd

Maximum Day (from MORs) 250,000 gpd

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 MQ Diesel - MQP30IZ

Capacity of Standby (kW) 100

Switchover: Automatic Manual

Hrs Operated Under Load 4 hrs/mo.

What equipment does it operate?

Well Pumps Backup wells

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 N/A

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 Yes Date Unknown

Comments _____

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	N/A
	Reuse Water	N/A	N/A	N/A
	WW Plumbing	>100'	>100'	>100'
	Other Sanitary Hazard	None observed	None observed	None observed
PUMP	Type	Submersible	Submersible	Vertical turbine
	Manufacturer Name	Sta-Rite	Sta-Rite	Goulds
	Model Number	Unknown	Unknown	Unknown
	Rated Capacity (gpm)	185	185	950
	Motor Horsepower	10	10	75
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	Yes	

COMMENTS Well 1 and 2 serve as back-up wells. *Well 2 had threaded raw tap. Well 3 had algae on pump and wellpad.

CHLORINATION (Disinfection)

Type: Gas Hypo
 Make (2) Chem-Tech Capacity 30 gpd
 Chlorine Feed Rate 80% stroke
 Avg. Amount of Cl₂ gas used N/A
 Chlorine Residuals: Plant 0.69 Remote 0.53
 Remote tap location Terry's Sports Bar & Grill
 DPD Test Kit: On-site With operator
 None Not Used Daily
 Injection Points Prior to elevated tank
 Booster Pump Info N/A
 Comments _____

STORAGE FACILITIES

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

Tank Type/Number	H1/ft	H2/ft*	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	40/60'
Access Secured	Yes	Yes	Yes
Access Manhole	Yes	Yes	Yes
Tank Sample Tap Location	On tank	On tank	Discharge piping
Date of Inspection	N/A	N/A	12/19
Date of Cleaning	N/A	N/A	12/19

Chlorine Gas Use Requirements	Chlorine Gas Use		Comments
	YES	NO	
Dual System	<input type="checkbox"/>	<input type="checkbox"/>	Diagonally crossed out
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 and H2 offline since about 2015.

HIGH SERVICE PUMPS

Pump Number		Diagonally crossed out
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:

Areas of Concern	Rule	Corrective Action	Date Corrected	Significant Deficiency?
Vertical turbine pump and well pad had biogrowth.	62-555.350(2)	Thoroughly clean.	6/2/20 – Debbie Dillon stated in an email that algae growth had been treated with chlorine and removed.	No
Raw sample tap is threaded. [Well 2 had threaded raw tap.]	62-555.320(8)(b)2	Provide a downward opening, smooth-nosed raw water sampling tap with no threads, at least 12" above well pad, located before the check valve if possible & before all treatment facilities & chemical application points.	6/2/20 – Debbie Dillon stated in an email that the threaded tap had been trimmed and was no longer threaded.	No
No record that the calibration of the finished-drinking-water flow meter has been checked.	62-555.350(2)	The calibration of finished-drinking-water flow meters should be checked at least once every 5 years.	6/4/20 – Flow meter calibration was completed 6/4/20.	No

MONITORING REMINDER:

- Nitrate and nitrite samples are required to be collected from the point of entry (POE) to the distribution system annually. The 2020 results have not been received.
- The consumer confidence report (CCR) must be delivered to consumers and the Department no later than July 1, 2020, and certification of delivery of the CCR must be submitted to the Department no later than August 10, 2020.
- Monitoring schedules are available on the Central District’s Drinking Water site:

<https://floridadep.gov/central/central/content/resources-drinking-water-facilities-and-operators-central-district>

COMMENTS:

- Contact FRWA (Florida Rural Water Association) at 850-668-2746, or frwa@frwa.net, for free technical assistance with your system. FRWA has extended benefits offered to members.
- Provide documentation that the finished-drinking-water meter has been calibrated at least every 5 years.
 Checking the calibration of finished-drinking-water meters at treatment plants shall be performed in accordance with the equipment manufacturer's recommendations or in accordance with a written preventive maintenance program established by the supplier of water. [Rule 62-555.350(2), F.A.C.]
- Suppliers of water shall submit written notification to the Department before beginning work or alterations to the public water system. Each notification shall be submitted to the appropriate Department of Environmental Protection District Office or Approved County Health Department and shall include the following: a description of the scope, purpose, and location of the work or alterations; and assurance that the work or alterations will comply with

applicable requirements listed in Rule 62-555.330, F.A.C. Suppliers of water may begin such work or alterations 14 days after providing notification to the Department unless they are advised by the Department that the notification is incomplete or that a construction permit is required.

- Suppliers of water shall telephone the SWO at 1-800-320-0519 immediately (i.e., within two hours) after discovery of any actual or suspected sabotage or security breach, or any suspicious incident, involving a public water system. [Rule 62-555.350(10)(a), F.A.C.]
- Suppliers of water shall telephone, and speak directly to a person at, the appropriate DEP District Office as soon as possible, but never later than noon of the next business day, in the event of any of the following emergency or abnormal operating conditions:
 - The occurrence of any abnormal color, odor, or taste in a public water system's raw or finished water;
 - The failure of a public water system to comply with applicable disinfection requirements; or
 - The breakdown of any water treatment or pumping facilities, or the break of any water main, in a public water system if the breakdown or break is expected to adversely affect finished-water quality, interrupt water service to 150 or more service connections or 350 or more people, interrupt water service to any one service connection for more than eight hours, or necessitate the issuance of a precautionary "boil water" notice in accordance with the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(10)(b), F.A.C.]
- Suppliers of water shall notify affected water customers in writing or via telephone, newspaper, radio, or television; and telephone, and speak directly to a person at, the appropriate DEP District Office by no later than the previous business day before taking PWS components out of operation for planned maintenance or repair work if the work is expected to adversely affect finished-water quality, interrupt water service to 150 or more service connections or 350 or more people, interrupt water service to any one service connection for more than eight hours, or necessitate the issuance of a precautionary "boil water" notice in accordance with the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(10)(d), F.A.C.]
- Suppliers of water shall issue precautionary "boil water" notices as required or recommended in the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(11), F.A.C.]

Amada Fernandez

Inspector Signature

Amada Fernandez

Printed Name

Environmental Specialist II

Title

6/10/20

Date

Jill Farris

Reviewer Signature

Jill Farris

Printed Name

Environmental Manager

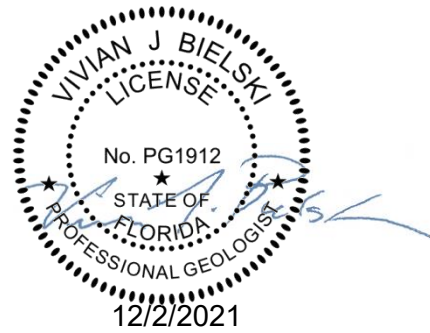
Title

6/10/20

Date

ATTACHMENT H

Impact Analysis and Predicted Drawdown Contour Maps



HYDROGEOLOGIC IMPACT ANALYSIS

**TRADEWINDS UTILITIES, INC.
MARION COUNTY
MODIFICATION APPLICATION CUP 2995-6**

Prepared by Vivian J. Bielski, P.G.
Professional Geologist License No. PG 0001912
Andreyev Engineering, Inc.
December 2, 2021

Prepared for
TRADEWINDS UTILITIES, INC.

ABSTRACT

An analyses was performed to predict the potential for impacts resulting from withdrawals at the Tradewinds Utilities, Inc. site, located on the east side of NE 28th Avenue in North Central Marion County, approximately 3 miles northeast of Ocala and 3 miles northwest of Silver Spring. This impact analysis was performed to demonstrate compliance with District rules regarding potential impacts. The Minimum Flow and Level (MFL) site of concern to the District is Silver Spring located as indicated above.

Due to the fact that the St. Johns River Water Management District's (SJRWMD's) East Central Florida Regional Map does not include the area of this project, the Southwest Florida Water Management District's (SWFWMD's) DWRM3 2018 version regional model was used for the modeling scenarios to predict the potential for impacts. The SWFWMD's regional model is a 6-layer model. Layer one represents the surficial aquifer, layers two and three represent the intermediate aquifer which is not present in this area, layer 4 represents the top of the upper Floridan aquifer flow, layer 5 represents the lower portion of the upper Floridan aquifer flow, and layer 6 represents the lower Floridan aquifer which is not included in this analysis. No changes were made to the model flow parameters in the DWRM3 Regional Model and no additional recharge resulting from the irrigation was included. This regional model includes permitted wells from the SJRWMD in the boundaries of the model.

The proposed total Annual Average Day well withdrawal of 332,000 gallons per day (gpd), requested for this permit modification, was included in layers 4 and 5 of the model, which represents the Upper Floridan aquifer. The wells are cased and open to the upper Floridan aquifer. The results of model indicate that the predicted drawdown in the surficial aquifer and the upper Floridan aquifer is less than 0.006 feet and the predicted drawdown at Silver Spring is less than 0.002 feet. The location of Silver Spring is shown the drawdown contour maps included in the attachment to this report. Therefore, the withdrawal rates proposed for this permit application meet the conditions for issuance in accordance with Chapter 40C-4.301, Florida Administrative Codes (F.A.C.).

SPECIFIC HYDROGEOLOGIC IMPACT ANALYSIS OF THE AQUIFER SYSTEMS

Surficial Aquifer System

The predicted impact in the surficial aquifer resulting from the total AAD withdrawal in the upper Floridan aquifer from the existing well is less than 0.006 feet, less than 0.006 feet at the nearest surface water feature, and less than 0.002 feet at Silver Spring. Please see **Attachment 1** for the drawdown contour map of the predicted impacts in the surficial aquifer. It is therefore the opinion of this Professional Geologist, that the withdrawal rates proposed for this permit application meet the conditions for issuance in accordance with Chapter 40C-2.301, Florida Administrative Codes (F.A.C.) with regard to the surficial aquifer systems.

Upper Floridan Aquifer System – Layer 4 (top portion of the upper Floridan aquifer)

The predicted impact in the upper Floridan aquifer resulting from the total AAD withdrawal in the upper Floridan aquifer from the existing well is less than 0.006 feet, less than 0.006 feet at the nearest surface water feature, and less than 0.002 feet at Silver Spring. Please see **Attachment 1** for the drawdown contour map of the predicted impacts in the two layers of the upper Floridan aquifer. It is therefore the opinion of this Professional Geologist, that the withdrawal rates proposed for this permit application meet the conditions for issuance in accordance with Chapter 40C-2.301, Florida Administrative Codes (F.A.C.) with regard to the upper Floridan aquifer systems.

CONCLUSIONS

Based upon the predicted impacts resulting from the proposed AAD withdrawals from the upper Floridan aquifer, the fact that the regional model does not account for the usual recharge occurring from use and storage of water on the surface, it is the opinion of this Professional Geologist, that the requested quantities meet the conditions for issuance in accordance with Chapter 40C-4.301, Florida Administrative Codes (F.A.C.).

REFERENCES:

USGS, 1988, A Modular Three-Dimensional Finite-Difference Ground-Water Flow Model, Book 6.

ESI, April 2015, Development of the District Wide Regulation Model for the Southwest Florida Water Management District.

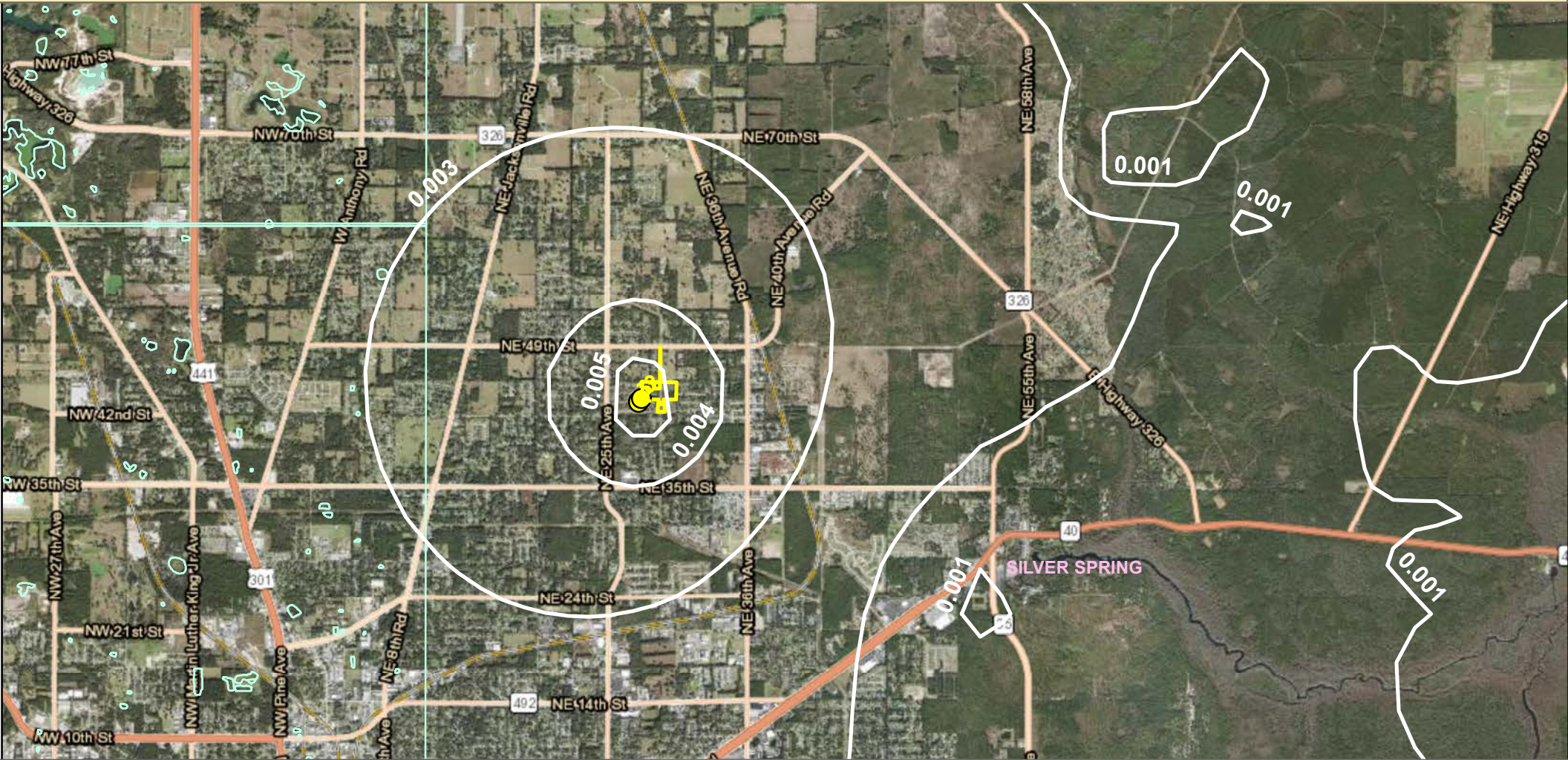
SWFWMD, 1987, Ground-Water Resource Availability Inventory: Marion County, Florida

ATTACHMENT A

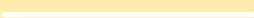

Drawdown Contour Maps (3)

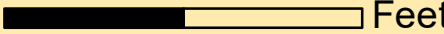
Surficial Aquifer (Layer 1) Drawdown Contours


Tradewinds Utilities, Inc. CUP 2995-6 Modification Marion County




Legend

-  Surficial Aquifer DD Contours
-  Wells
-  Property Boundary
-  National Wetlands Inventory

0 5,000 10,000
 Feet


 N



**Andreyev
Engineering, Inc.**

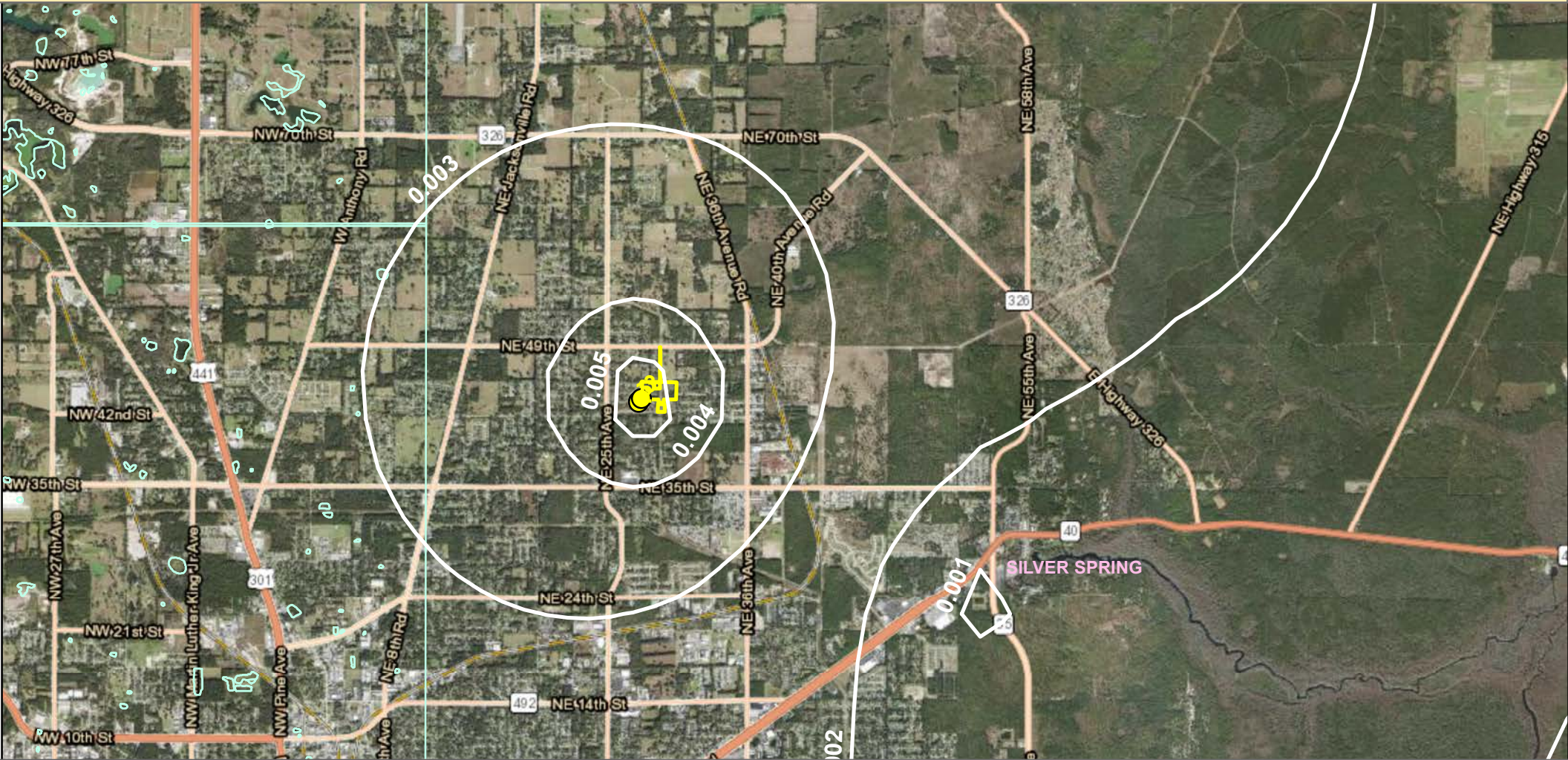
Drawn by VJB
 11/9/2021

Upper Floridan Aquifer (Layer 4) Drawdown Contours


Tradewinds Utilities, Inc.

CUP 2995-6 Modification

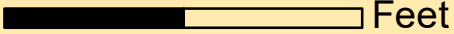


Marion County



Legend

-  Upper Floridan L4 DD Contours
-  Wells
-  Property Boundary
-  National Wetlands Inventory

0 5,000 10,000 Feet

**Andreyev
Engineering, Inc.**

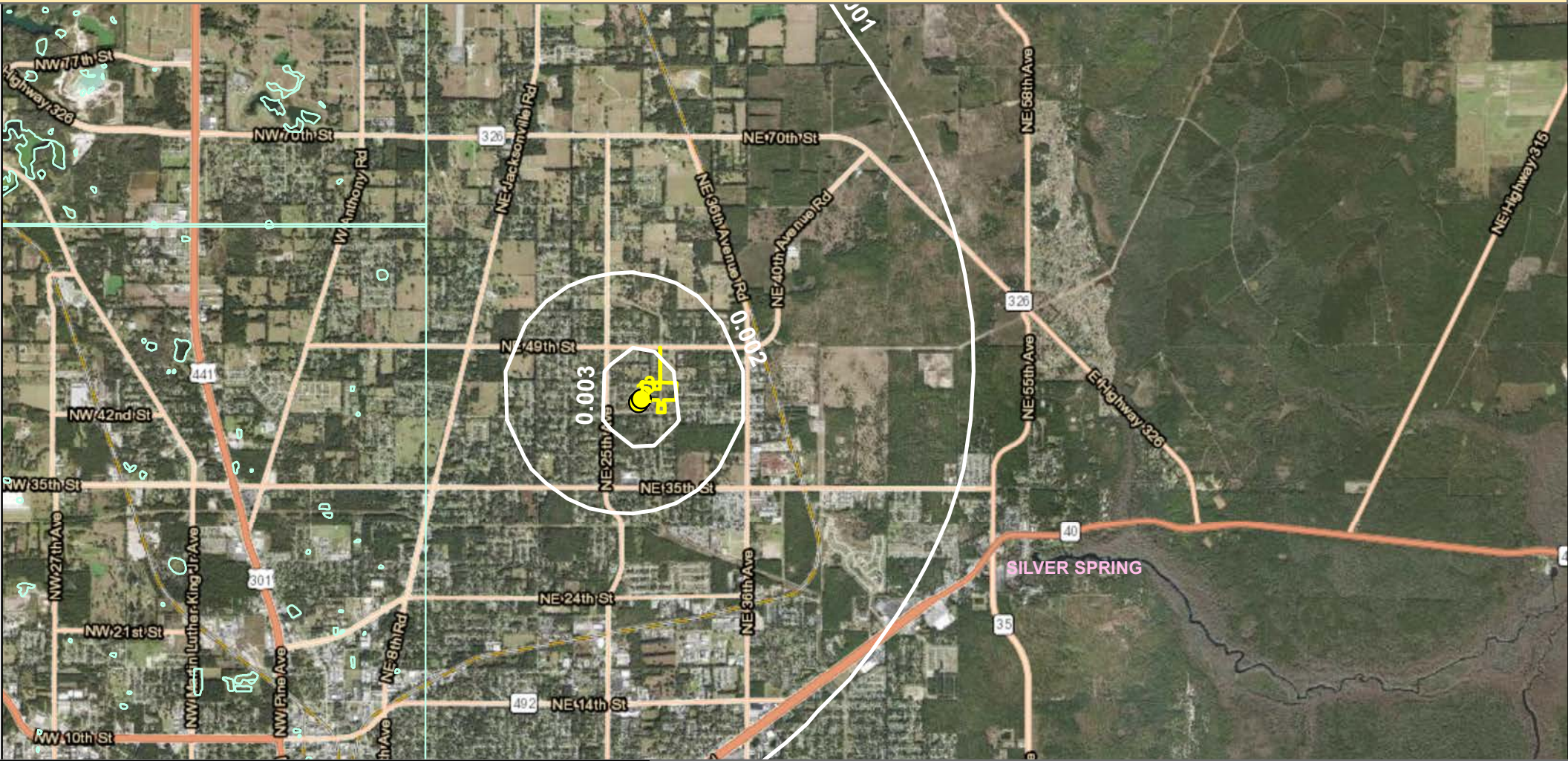
Drawn by VJB
11/9/2021

Upper Floridan Aquifer (Layer 5) Drawdown Contours

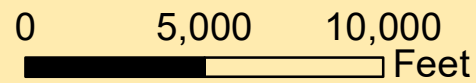
Tradewinds Utilities, Inc.

CUP 2995-6 Modification

Marion County



- Legend**
-  Upper Floridan L5 DD Contours
 -  Wells
 -  Property Boundary
 -  National Wetlands Inventory



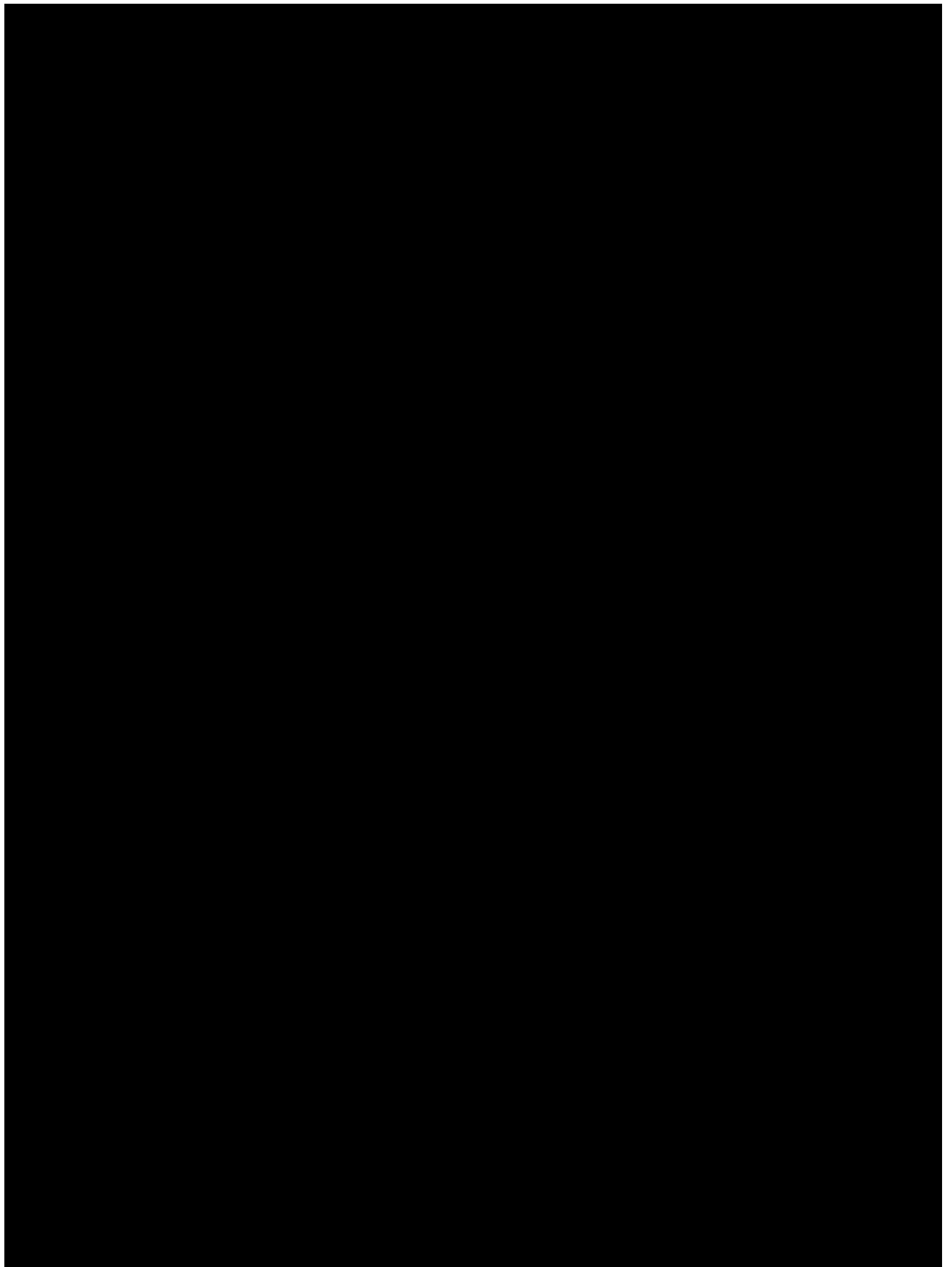

**Andreyev
Engineering, Inc.**

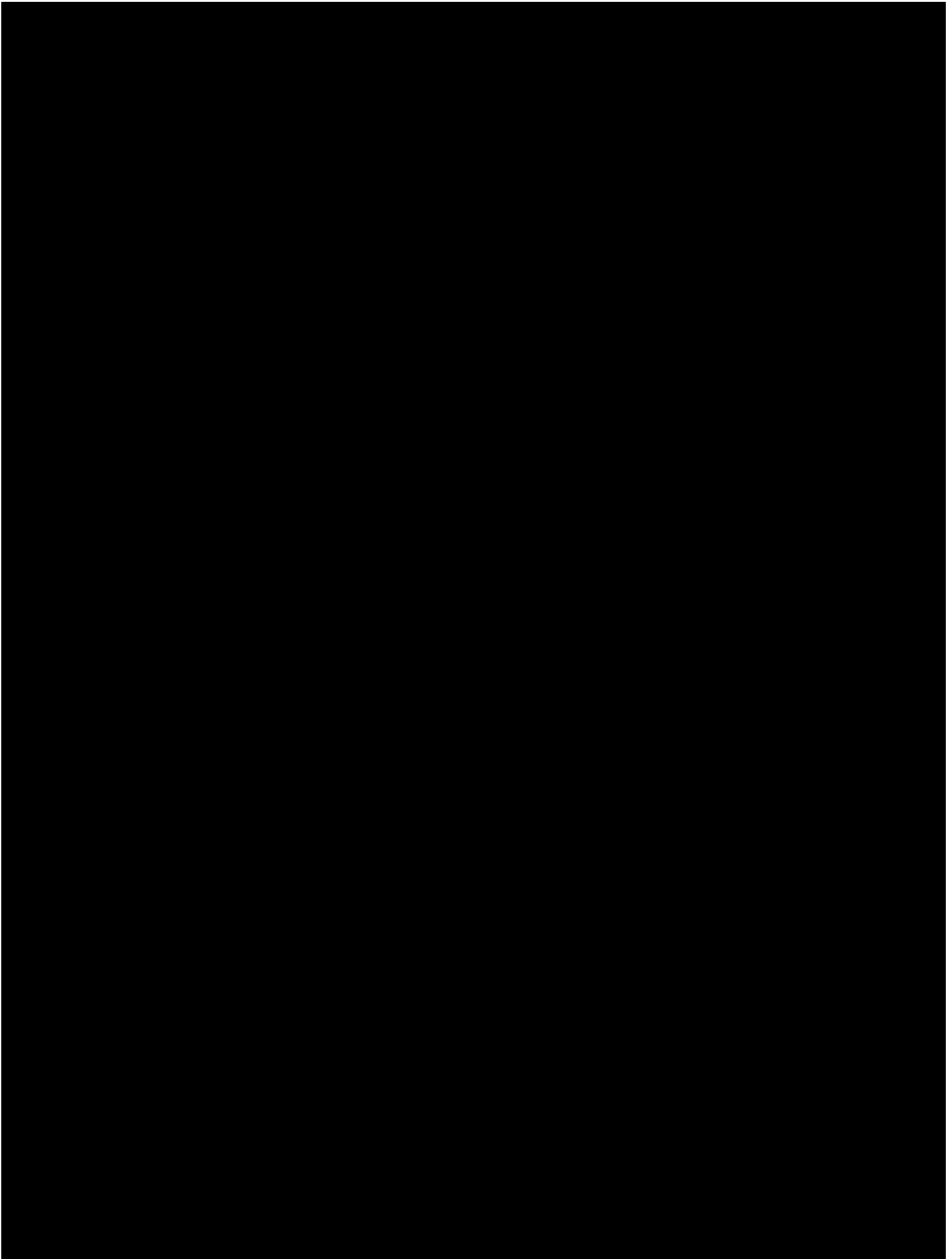
Drawn by VJB
11/9/2021

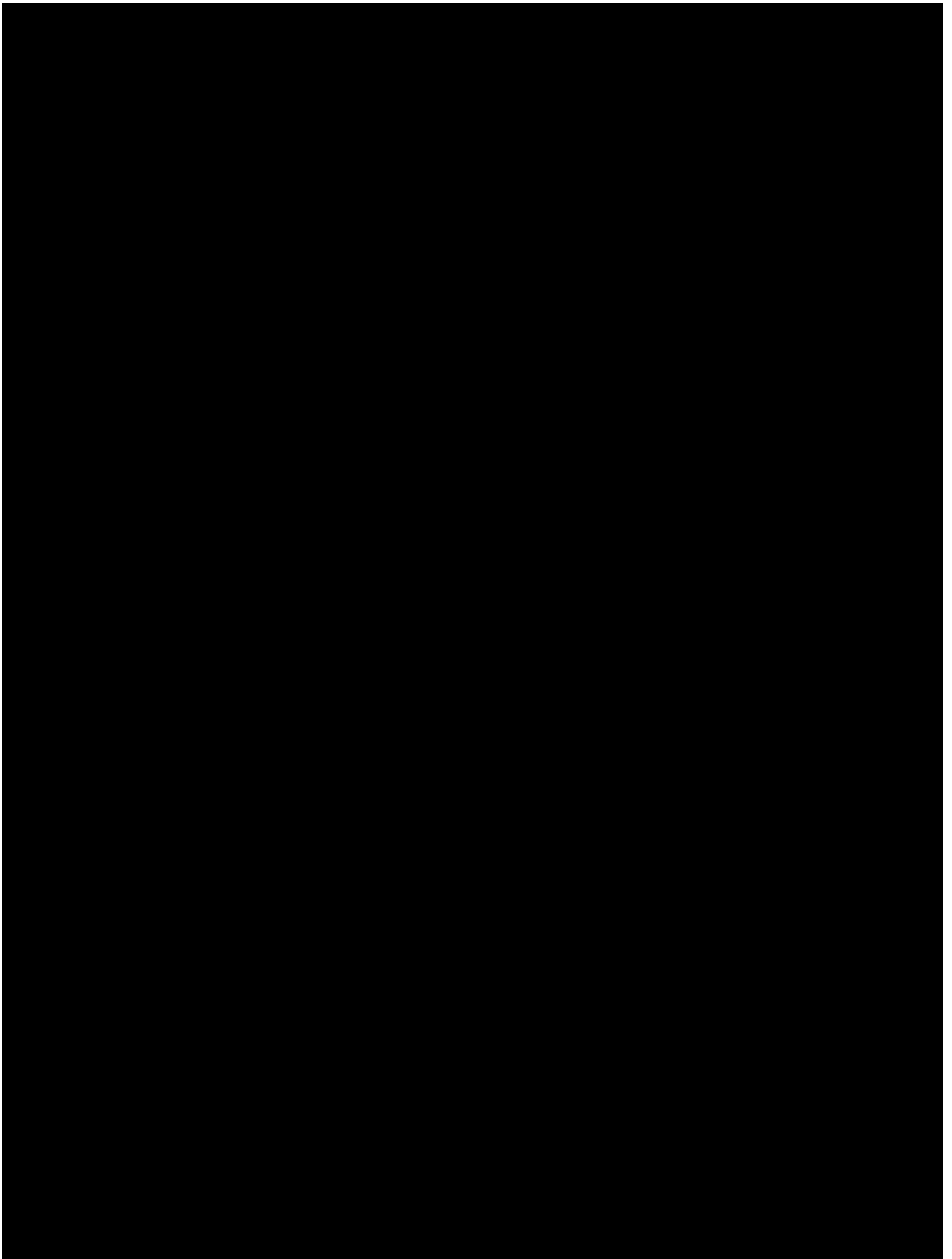
ATTACHMENT E
Local Vendor Recommendations

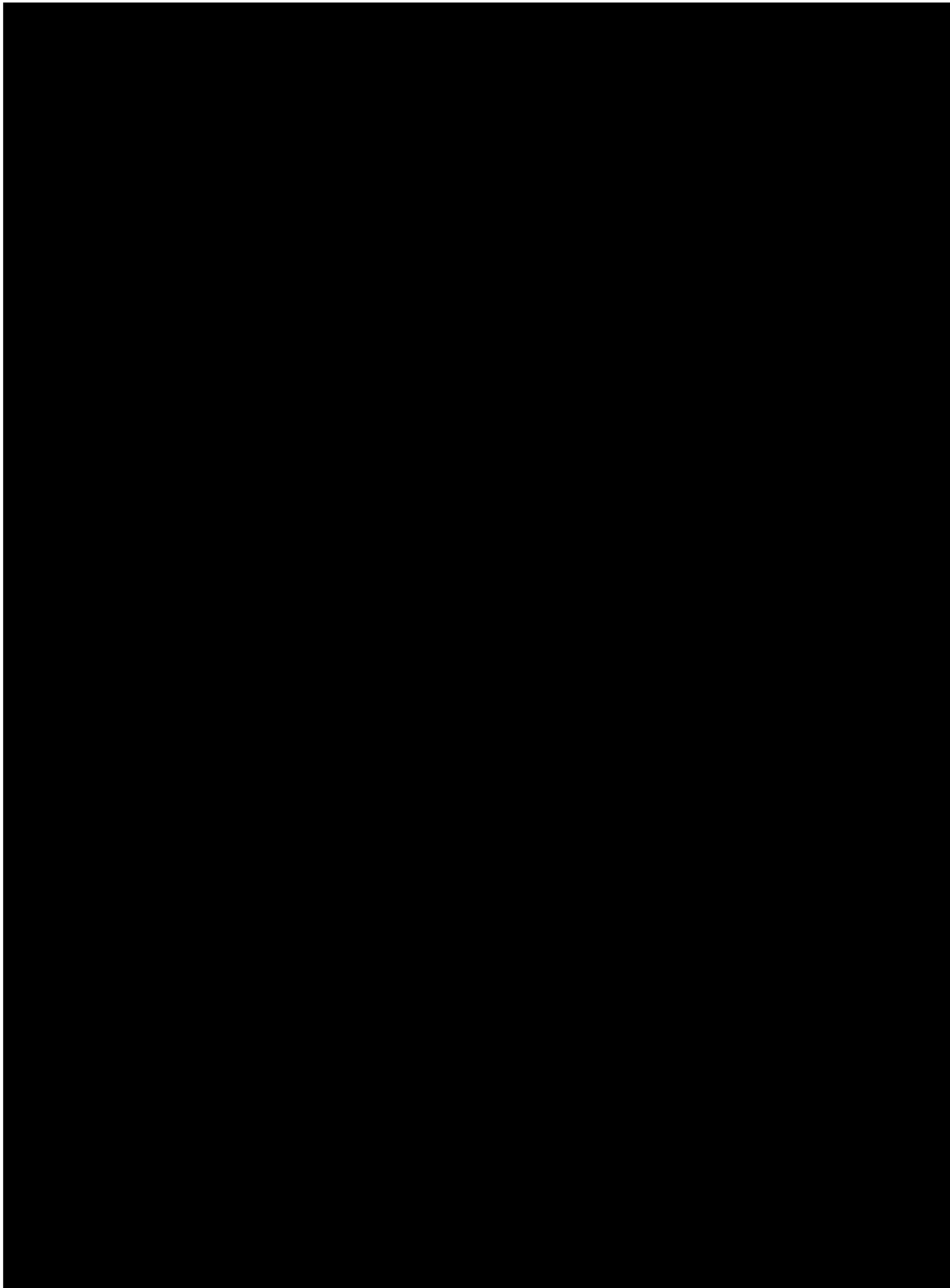
- a. Recommendations for local vendors
 - i. O&M Companies
 - ii. Labs or Testing Companies; Aqua Pure (352)355-2383
 - iii. Sludge Haulers; American Pipe & Tank (352)615-1114
 - iv. General Contractors; ESI-Engineering Solution Inc. (352)789-0389
Blake Utilities (352)625-0269
 - v. Well Drillers
 - vi. Electricians; Interstate Electric (352)732-6332

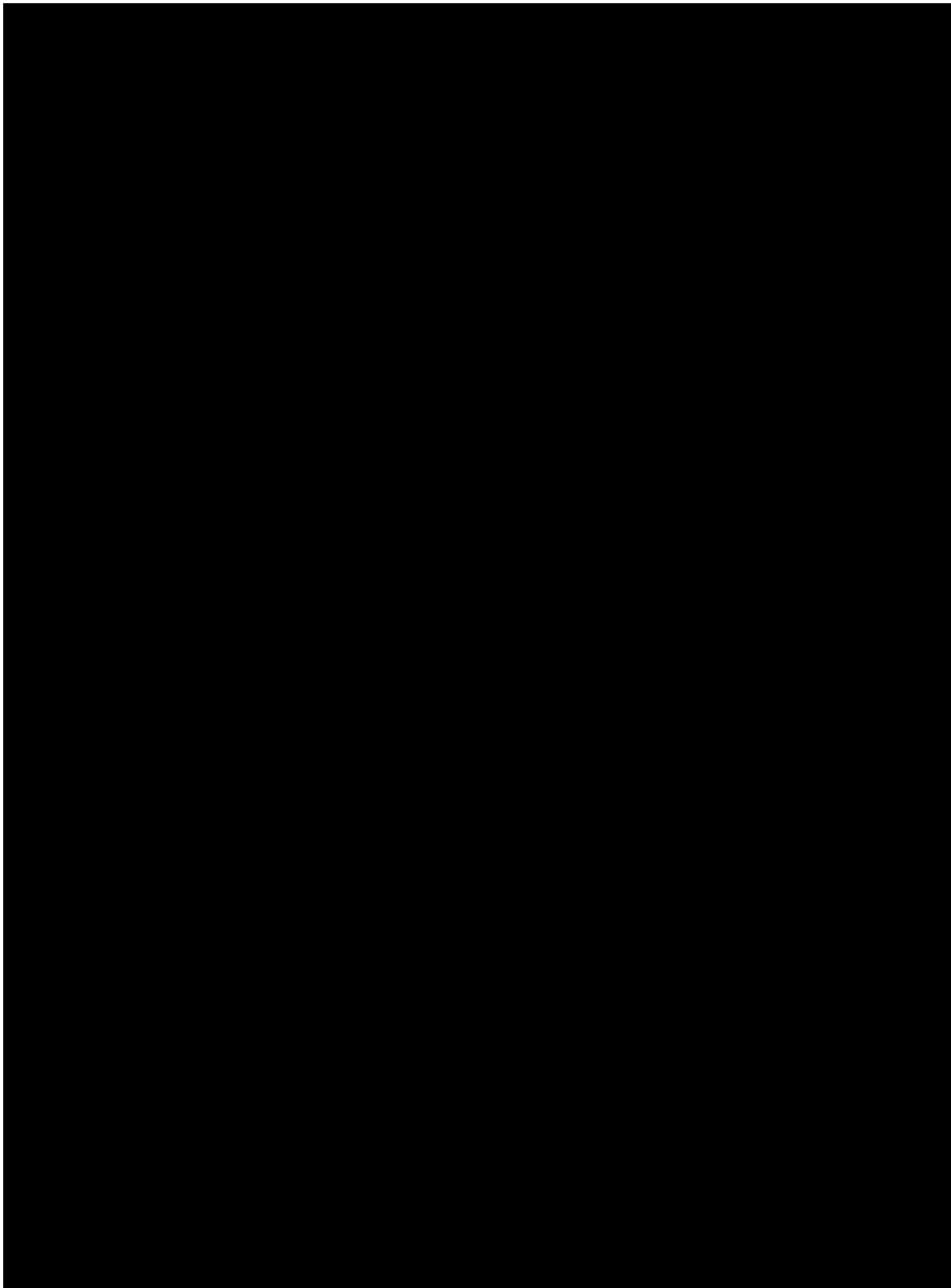
ATTACHMENT F
Wastewater Facility Photos

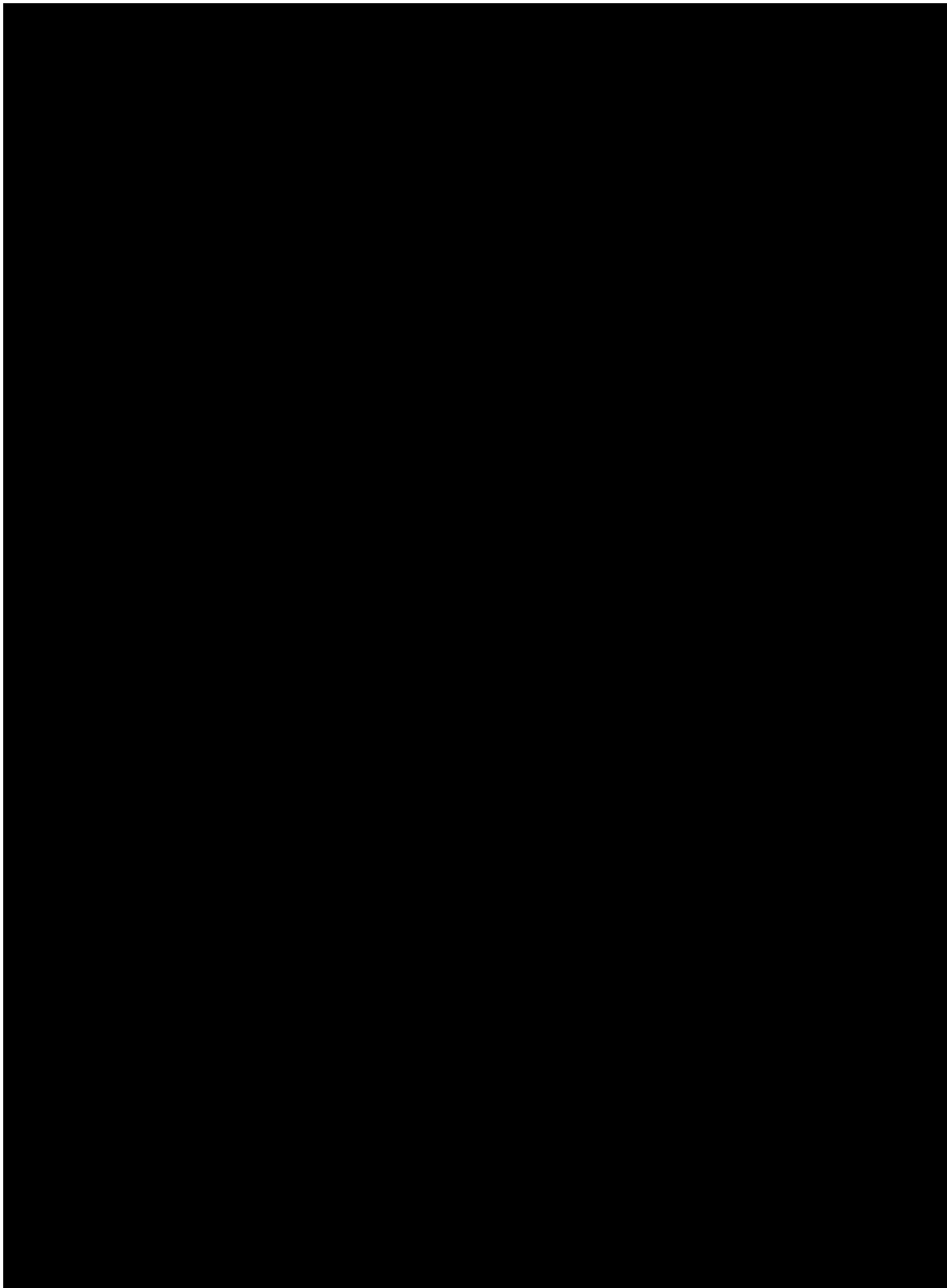


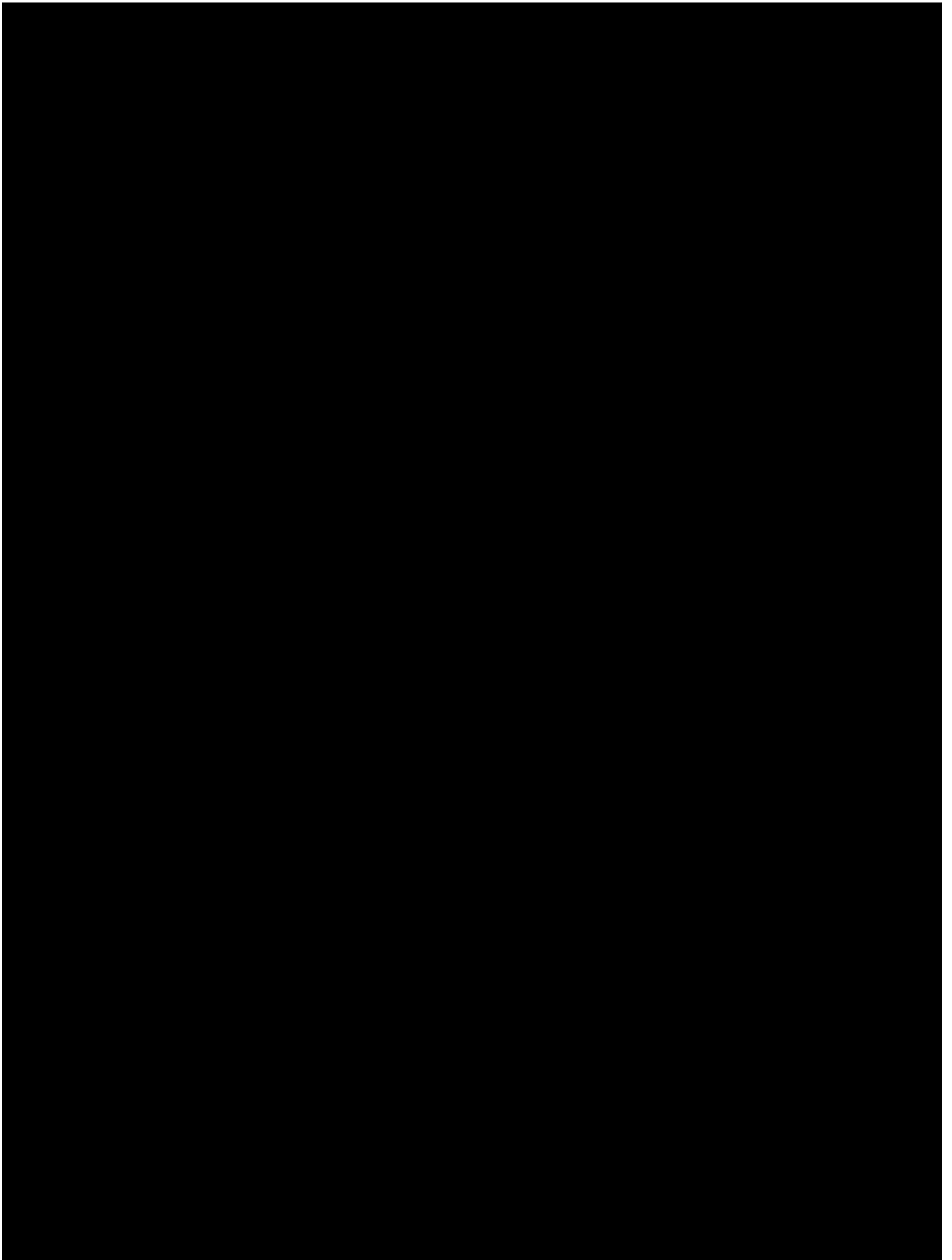


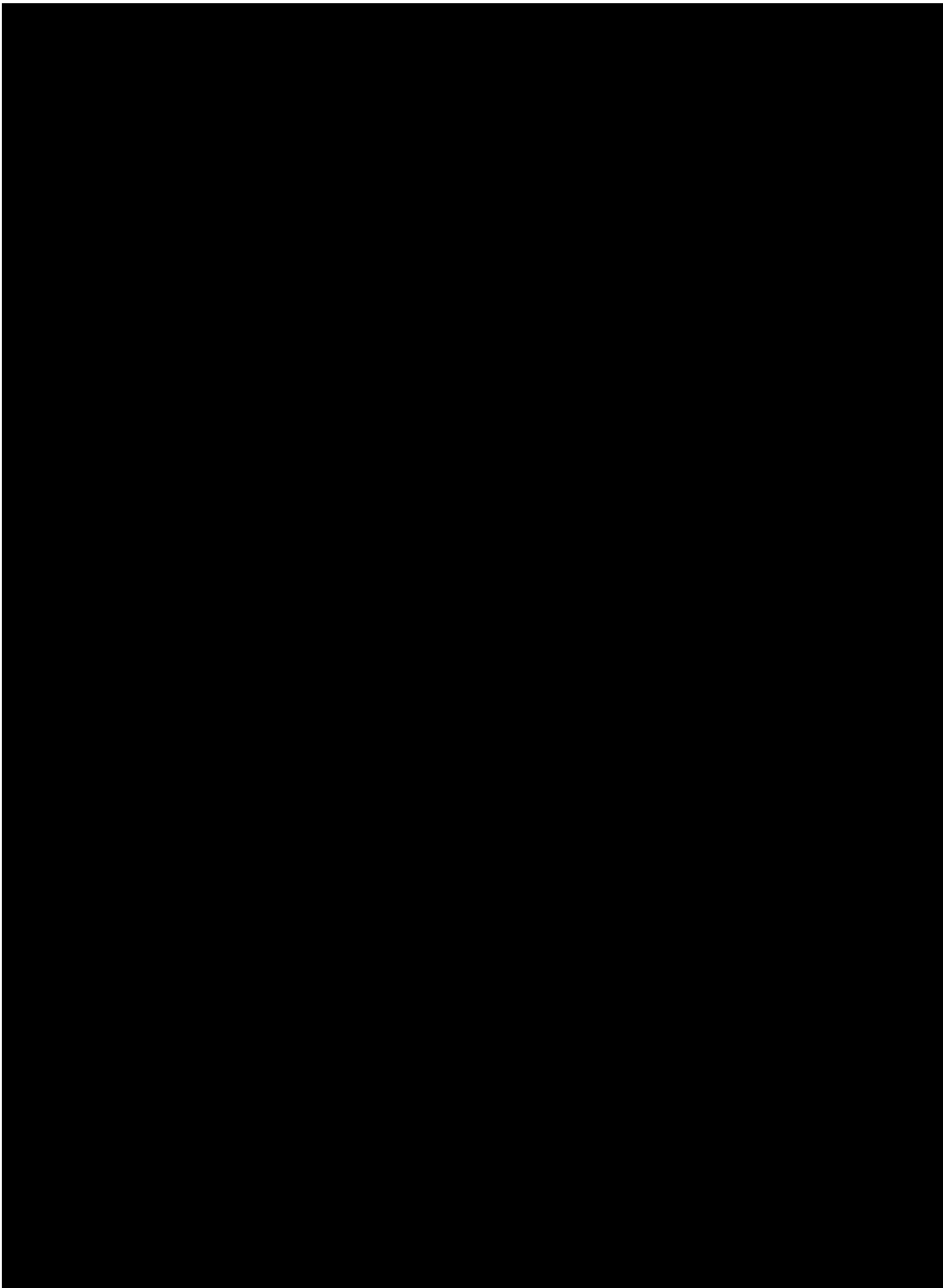












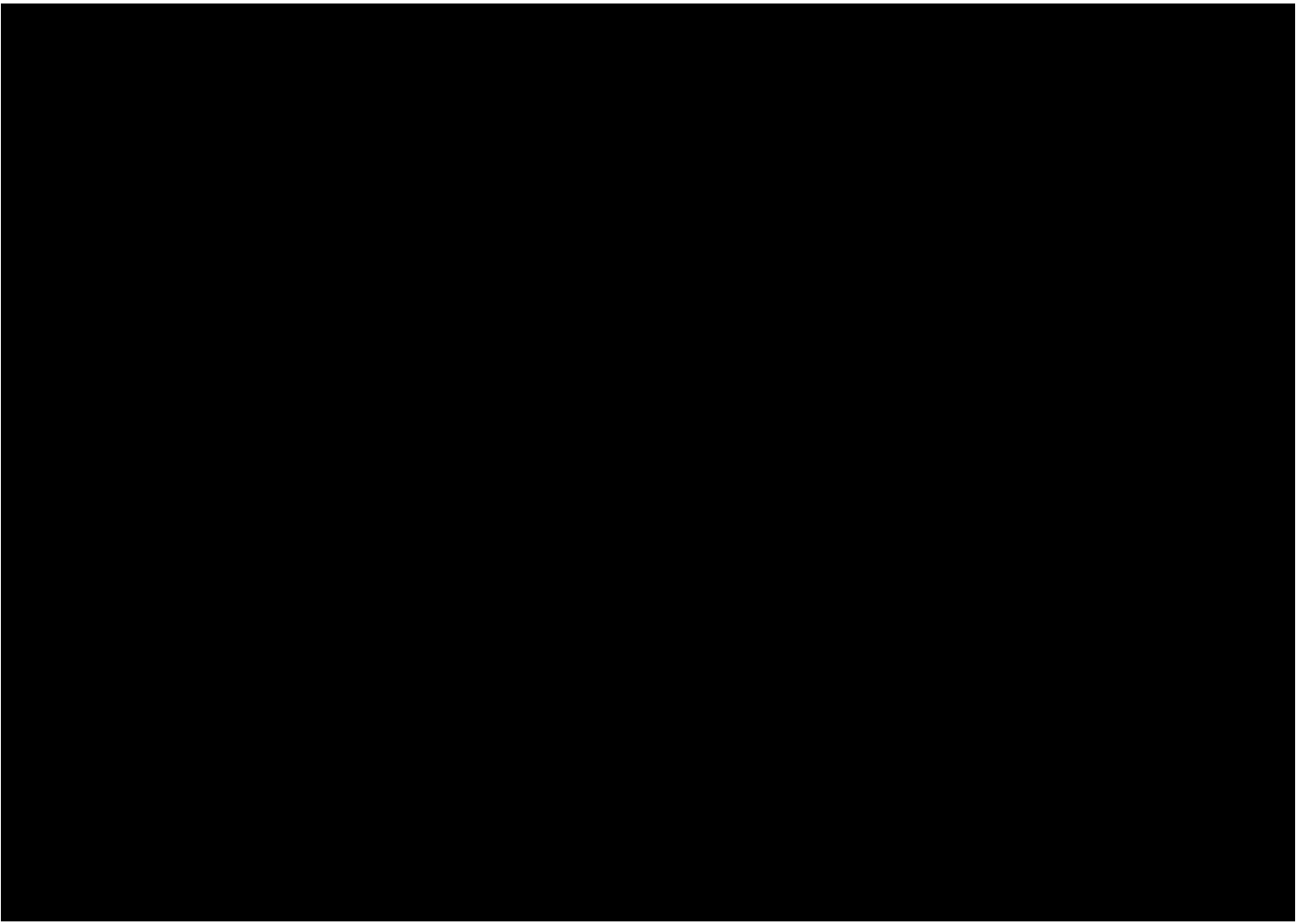


EXHIBIT 2

WATER FACILITY REPORT
TRADEWINDS UTILITIES, INC.

LOCATION:
MARION COUNTY, FLORIDA

PREPARED FOR:
Central States Water Resources
500 Northwest Plaza Dr., Suite 500
St. Ann, MO 63074

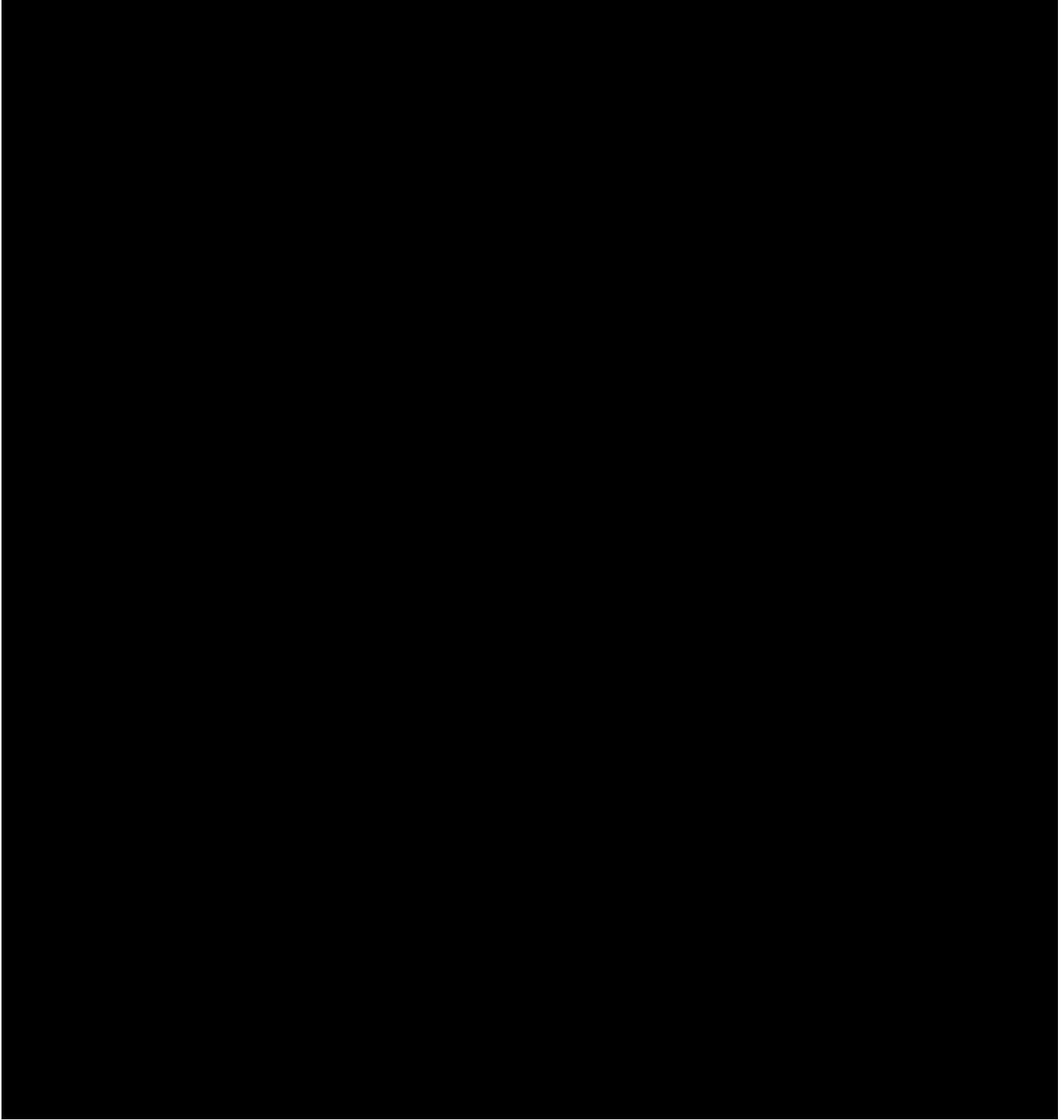
DATE:
March 2022

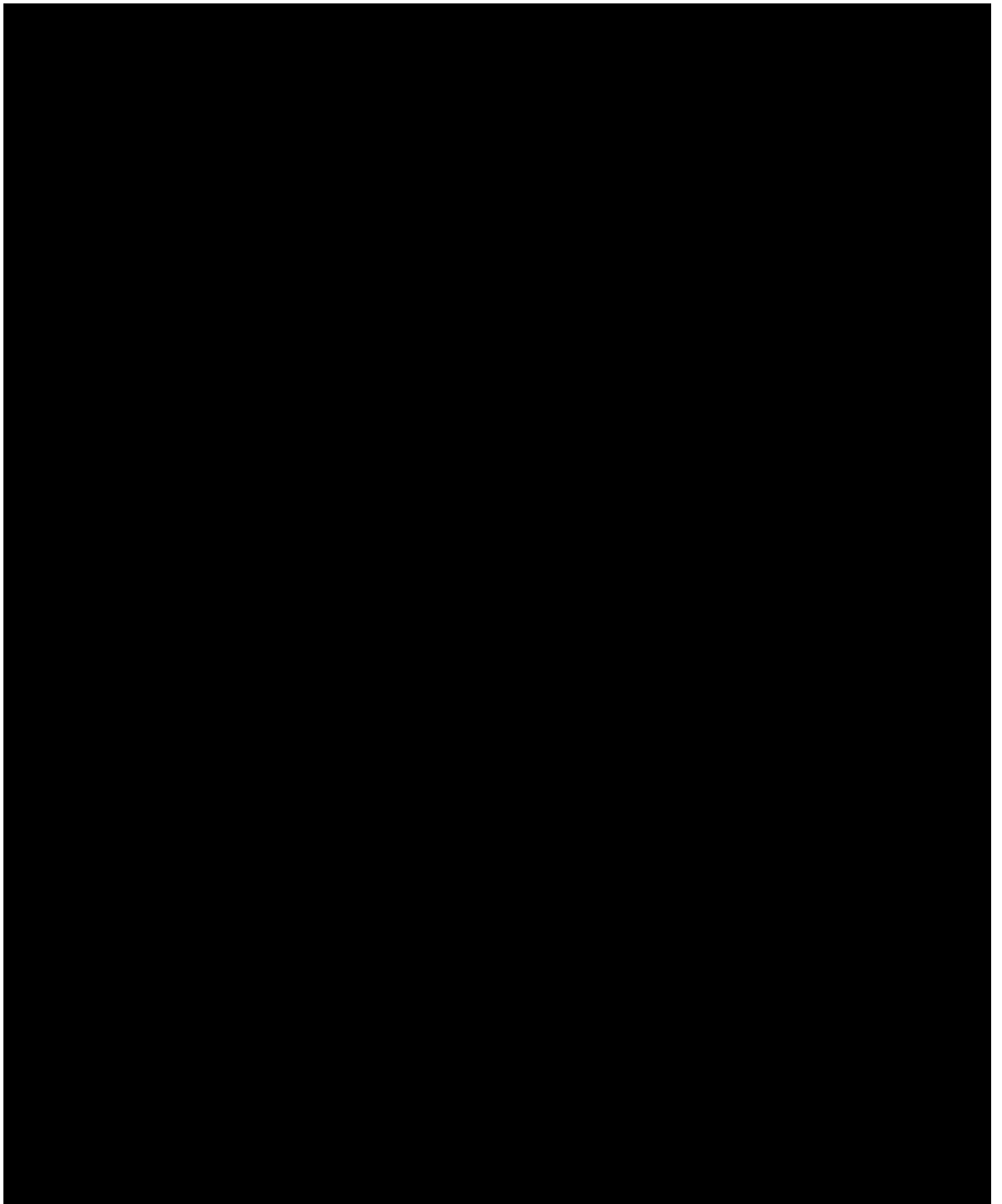


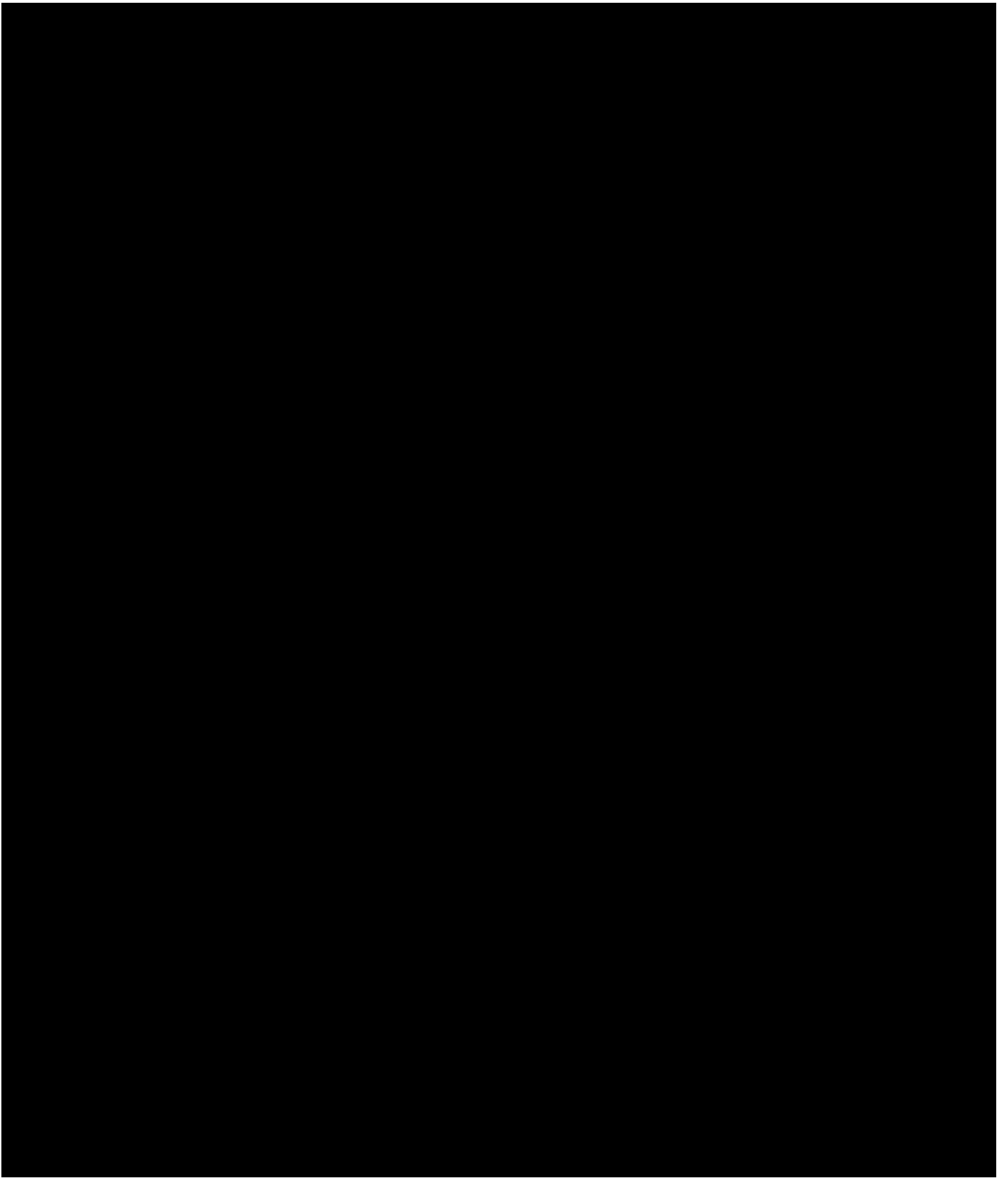
PREPARED BY:
Clearpoint
CONSULTING ENGINEERS, P.A.

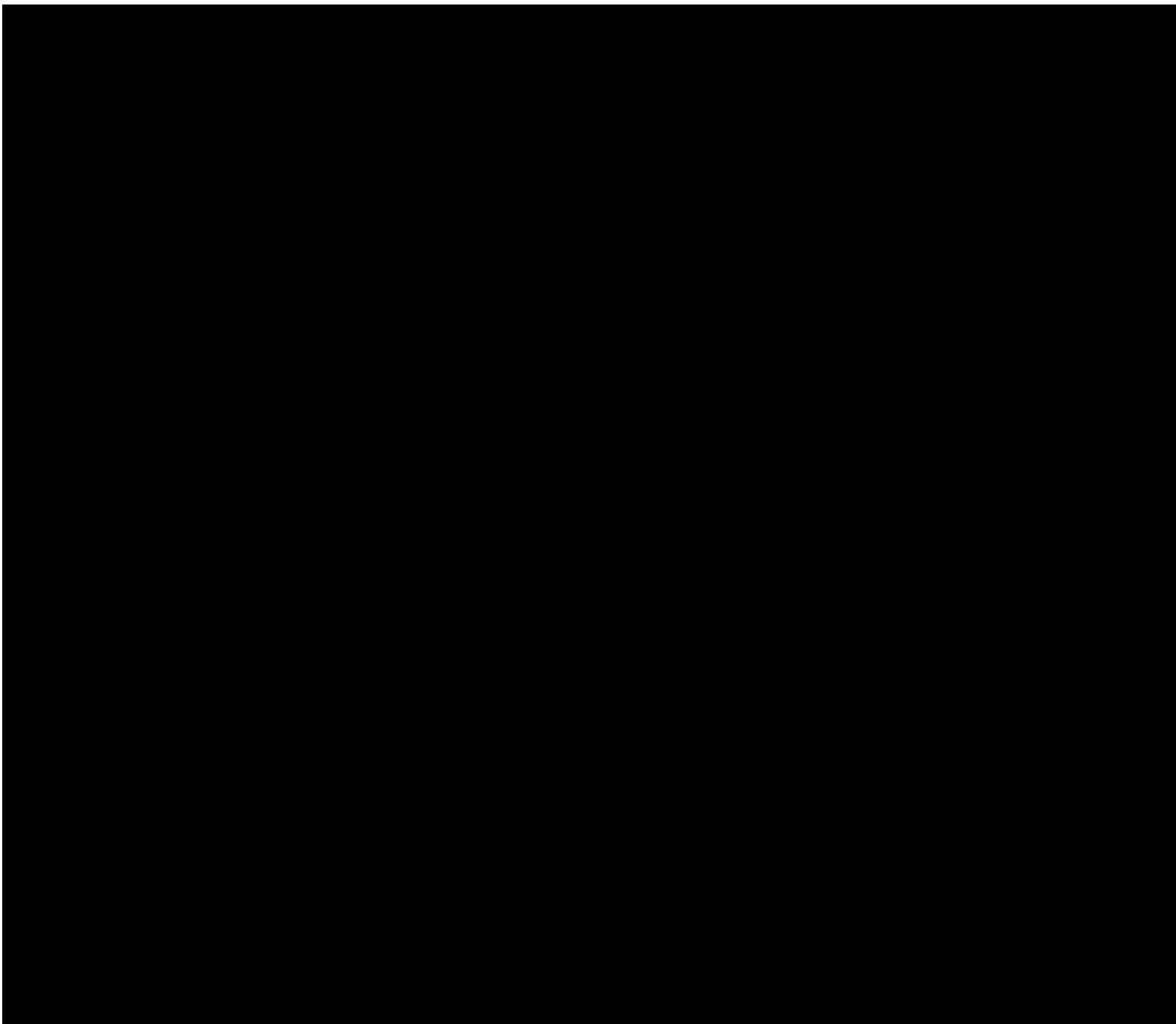
6652 U.S. Highway 98
Hattiesburg, MS 39402

ENGINEERING MEMO
TRADEWINDS VILLAGE
MARION COUNTY, FL
MARCH 2022









SUPPORTING DOCUMENTATION TO
WATER ENGINEERING MEMO
TRADEWINDS UTILITIES, INC.

LOCATION:
MARION COUNTY, FLORIDA

PREPARED FOR:
Central States Water Resources
500 Northwest Plaza Dr., Suite 500
St. Ann, MO 63074

DATE:
March 2022



PREPARED BY:
Clearpoint
CONSULTING ENGINEERS, P.A.

6652 U.S. Highway 98
Hattiesburg, MS 39402

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ATTACHMENT A

Water System Permit Information



St. Johns River Water Management District

Hans G. Tanzler III, Executive Director

4049 Reid Street • P.O. Box 1429 • Palatka, FL 32178-1429 • (386) 329-4500
On the Internet at floridaswater.com.

February 27, 2015

Tradewinds Utilities Inc
Charles DeMenzes
PO Box 5220
Ocala, FL 34478-5220

SUBJECT: Consumptive Use Permit Number 2995-6
Tradewinds Utilities Inc

Dear Sir/Madam:

Please be advised that the period of time within which a third party may request an administrative hearing on this permit may not have expired by the date of issuance. A potential petitioner has twenty-six (26) days from the date on which the actual notice is deposited in the mail, or twenty-one (21) days from publication of this notice when actual notice is not provided, within which to file a petition for an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes. Receipt of such a petition by the District may result in this permit becoming null and void.

Also, be advised that the District will not publish a notice in the newspaper advising the public that it has issued this permit. Enclosed is information on publishing notice of the permit. If you do not publish a newspaper notice to close the point of entry, the time to challenge the issuance of your permit will not expire.

The enclosed permit is a legal document and should be kept with your other important records. Please read the permit and conditions carefully since the referenced conditions may require submittal of additional information. Where possible, please submit all information required to comply with permit conditions, electronically, at floridaswater.com/permitting via the District's e-Permitting portal. If you have any questions concerning the conditions of your permit, please contact Jay Lawrence in the Jacksonville Service Center at (386) 329-4205.

Sincerely,

A handwritten signature in cursive script that reads 'M. Daniels'.

Margaret Daniels, Bureau Chief
Bureau of Regulatory Support

Agent: Miles C Anderson
Miles Christian Anderson Consulting Eng Inc
2300 SE 17th St Ste 200
Ocala, FL 34471-9185

GOVERNING BOARD

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FERNANDINA BEACH

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JACKSONVILLE

ST. JOHNS RIVER WATER MANAGEMENT DISTRICT
Post Office Box 1429
Palatka, Florida 32178-1429

PERMIT NO: 2995-6

DATE ISSUED: February 27, 2015

PROJECT NAME: Tradewinds Utilities Inc

A PERMIT AUTHORIZING:

The District authorizes, as limited by the attached conditions, the continued use of 48.00 million gallons per year (mgy) (0.132 million gallons per day (mgd) (annual average)) of groundwater from the Upper Floridan aquifer for public supply use (includes household, water utility uses and unaccounted for losses) for an estimated population of 1,220 people in 2035.

LOCATION:

Site: Tradewinds
Marion County

SECTION(S): 34

TOWNSHIP(S): 14S

RANGE(S): 22E

ISSUED TO:

Tradewinds Utilities Inc
PO Box 5220
Ocala, FL 34478-5220

The permittee agrees to hold and save the St. Johns River Water Management District and its successors harmless from any and all damages, claims, or liabilities which may arise from permit issuance. Said application, including all plans and specifications attached thereto, is by reference made a part hereof.

This permit does not convey to the permittee any property rights nor any rights or privileges other than those specified herein, nor relieve the permittee from complying with any law, regulation or requirement affecting the rights of other bodies or agencies.

This permit may be revoked, modified or transferred at any time pursuant to the appropriate provisions of Chapter 373, Florida Statutes and 40C-1, Florida Administrative Code.

PERMIT IS CONDITIONED UPON:

See conditions on attached "Exhibit A", dated February 27, 2015

AUTHORIZED BY: St. Johns River Water Management District
Division of Regulatory, Engineering and Environmental Services

By:



Scott Laidlaw
Bureau Chief

"EXHIBIT A"
CONDITIONS FOR ISSUANCE OF PERMIT NUMBER 2995-6
Tradewinds Utilities Inc,
DATE ISSUED: February 27, 2015

1. With advance notice to the permittee, District staff with proper identification shall have permission to enter, inspect, observe, collect samples, and take measurements of permitted facilities to determine compliance with the permit conditions and permitted plans and specifications. The permittee shall either accompany District staff onto the property or make provision for access onto the property.
2. Nothing in this permit should be construed to limit the authority of the St. Johns River Water Management District to declare a water shortage and issue orders pursuant to Chapter 373, F.S. In the event of a declared water shortage, the permittee must adhere to the water shortage restrictions, as specified by the District. The permittee is advised that during a water shortage, reports shall be submitted as required by District rule or order.
3. Prior to the construction, modification or abandonment of a well, the permittee must obtain a water well permit from the St. Johns River Water Management District or the appropriate local government pursuant to Chapter 40C-3, F.A.C. Construction, modification, or abandonment of a well will require modification of the consumptive use permit when such construction, modification, or abandonment is other than that specified and described on the consumptive use permit application form.
4. Leaking or inoperative well casings, valves, or controls must be repaired or replaced as required to eliminate the leak or make the system fully operational.
5. The permittee's consumptive use of water as authorized by this permit shall not interfere with legal uses of water existing at the time of permit application. If interference occurs, the District shall revoke the permit, in whole or in part, to curtail or abate the interference, unless the interference associated with the permittee's consumptive use of water is mitigated by the permittee pursuant to a District-approved plan.
6. The permittee's consumptive use of water as authorized by this permit shall not have significant adverse hydrologic impacts to off-site land uses existing at the time of permit application. If significant adverse hydrologic impacts occur, the District shall revoke the permit, in whole or in part, to curtail or abate the adverse impacts, unless the impacts associated with the permittee's consumptive use of water are mitigated by the permittee pursuant to a District-approved plan.
7. The permittee shall notify the District in writing within 30 days of any sale, transfer, or conveyance of ownership or any other loss of permitted legal control of the Project and/or related facilities from which the permitted consumptive use is made. Where permittee's control of the land subject to the permit was demonstrated through a lease, the permittee must either submit documentation showing that it continues to have legal control or transfer control of the permitted system/project to the new landowner or new lessee. All transfers of ownership are subject to the requirements of Rule 40C-1.612, F.A.C. Alternatively, the permittee may surrender the consumptive use permit to the District, thereby relinquishing the right to conduct any activities under the permit.
8. A District-issued identification tag shall be prominently displayed at each withdrawal site by permanently affixing such tag to the pump, headgate, valve, or other withdrawal facility as provided by Rule 40C-2.401, F.A.C. The permittee shall notify the District in the event that a replacement tag is needed.

9. The permittee's consumptive use of water as authorized by this permit shall not significantly and adversely impact wetlands, lakes, rivers, or springs. If significant adverse impacts occur, the District shall revoke the permit, in whole or in part, to curtail or abate the adverse impacts, unless the impacts associated with the permittee's consumptive use of water are mitigated by the permittee pursuant to a District-approved plan.
10. The permittee's consumptive use of water as authorized by this permit shall not reduce a flow or level below any minimum flow or level established by the District or the Department of Environmental Protection pursuant to Section 373.042 and 373.0421, F.S. If the permittee's use of water causes or contributes to such a reduction, then the District shall revoke the permit, in whole or in part, unless the permittee implements all provisions applicable to the permittee's use in a District-approved recovery or prevention strategy.
11. The permittee's consumptive use of water as authorized by the permit shall not cause or contribute to significant saline water intrusion. If significant saline water intrusion occurs, the District shall revoke the permit, in whole or in part, to curtail or abate the saline water intrusion, unless the saline water intrusion associated with the permittee's consumptive use of water is mitigated by the permittee pursuant to a District-approved plan.
12. The permittee's consumptive use of water as authorized by the permit shall not cause or contribute to flood damage. If the permittee's consumptive use causes or contributes to flood damage, the District shall revoke the permit, in whole or in part, to curtail or abate the flood damage, unless the flood damage associated with the permittee's consumptive use of water is mitigated by the permittee pursuant to a District-approved plan.
13. The permittee's consumptive use of water as authorized by the permit shall not cause or contribute to a violation of state water quality standards (existing at the time of permit issuance) in receiving waters of the state, as set forth in Chapters 62-3, 62-4, 62-302, 62-520, and 62-550, F.A.C., including any anti-degradation provisions of paragraphs 62-4.242(1)(a) and (b), subsections 62-4.242(2) and (3), and Rule 62-302.300, F.A.C., and any special standards for Outstanding National Resource Waters set forth in subsections 62-4.242(2) and (3), F.A.C. If violations occur, the District shall revoke the permit, in whole or in part, to curtail or abate the violations, unless the violations associated with the permittee's consumptive use of water are mitigated by the permittee pursuant to a District-approved plan.
14. All consumptive uses authorized by this permit shall be implemented as conditioned by this permit, including any documents incorporated by reference in a permit condition. The District may revoke this permit, in whole or in part, or take enforcement action, pursuant to Section 373.136 or 373.243, F.S., unless a permit modification has been obtained to address the noncompliance. The permittee shall immediately notify the District in writing of any previously submitted information that is later discovered to be inaccurate.
15. This permit does not convey to the permittee any property rights or privileges other than those specified herein, nor relieve the permittee from complying with any applicable local government, state, or federal law, rule, or ordinance.
16. A permittee may seek modification of any term of an unexpired permit. The permittee is advised that Section 373.239, F.S., and Rule 40C-2.331, F.A.C., are applicable to permit modifications.
17. All submittals made to demonstrate compliance with this permit must include CUP number 2995-6, labeled on the submittal. Submittals should be made on-line at floridaswater.com/permitting whenever possible.

18. This permit will expire February 27, 2035.
19. Maximum annual groundwater withdrawals from the Upper Floridan aquifer for public supply use (including water utility and unaccounted for losses) must not exceed 48.00 million gallons.
20. The permittee must measure the quantity of groundwater withdrawn from wells 1 (Station ID 19078), 2 (Station ID 19079), and 3 (Station ID 19080), as listed in the application, through the use of recording totalizing flowmeters. All flow meters must measure within +/- 5% of actual flow, be verifiable and be installed according to the manufacturer's specifications.
21. Total withdrawal from groundwater wells 1 (Station ID 19078), 2 (Station ID 19079), and 3 (Station ID 19080), must be recorded continuously, totaled monthly, and reported to the District at least every six months for the duration of this permit using Water Use Pumpage Report Form (EN-50). The reporting dates each year will be as follows:

Reporting Period	Report Due Date
January – June	July 31
July – December	January 31.
22. The permittee must have all flow meters checked for accuracy at least once every 10 years, specifically before April 30 2024, and recalibrated if the difference between the actual flow and the meter reading is greater than 5%. Flow Meter Accuracy Report Form (EN-51) must be submitted to the District within 10 days of the inspection/calibration.
23. The permittee must maintain all flowmeters. In case of failure or breakdown of any meter, the District must be notified in writing within 5 days of its discovery. A defective meter must be repaired or replaced within 30 days of its discovery.
24. The permittee shall meter all service connections and other uses through the use of recording totalizing flow meters.
25. The permittee must implement the Water Conservation Plan submitted to the District, dated 07-24-2014, in accordance with the schedule contained therein.
26. If, at any time within permit duration, it becomes practical, economically feasible and permissible under applicable state and federal statutes or regulations promulgated thereunder, the District may require the permittee to make reclaimed water available for use at a permissible application site.
27. The permittee must submit to the District, an updated copy of the Public Service Commission's (PSC) approved service area map, within 30 days of receipt from the PSC.
28. A comprehensive water audit of the potable distribution system must be conducted annually. The audit period shall be January 1st through December 31st of each year. The results of the water audit must be submitted to the District by February 15th of the year following the audit period.
29. If the unaccounted for water losses are 10% or greater, as identified in the annual water audit, implementation of the leak detection and repair program must continue until the unaccounted for water losses are reduced below 10%.

Notice Of Rights

1. A person whose substantial interests are or may be affected has the right to request an administrative hearing by filing a written petition with the St. Johns River Water Management District (District). Pursuant to Chapter 28-106 and Rule 40C-1.1007, Florida Administrative Code, the petition must be filed (received) either by delivery at the office of the District Clerk at District Headquarters, P. O. Box 1429, Palatka Florida 32178-1429 (4049 Reid St., Palatka, FL 32177) or by e-mail with the District Clerk at Clerk@sjrwmd.com, within twenty-six (26) days of the District depositing the notice of District decision in the mail (for those persons to whom the District mails actual notice), within twenty-one (21) days of the District emailing the notice of District decision (for those persons to whom the District emails actual notice), or within twenty-one (21) days of newspaper publication of the notice of District decision (for those persons to whom the District does not mail or email actual notice). A petition must comply with Sections 120.54(5)(b)4. and 120.569(2)(c), Florida Statutes, and Chapter 28-106, Florida Administrative Code. The District will not accept a petition sent by facsimile (fax), as explained in paragraph no. 4 below.
2. Please be advised that if you wish to dispute this District decision, mediation may be available and that choosing mediation does not affect your right to an administrative hearing. If you wish to request mediation, you must do so in a timely-filed petition. If all parties, including the District, agree to the details of the mediation procedure, in writing, within 10 days after the time period stated in the announcement for election of an administrative remedy under Sections 120.569 and 120.57, Florida Statutes, the time limitations imposed by Sections 120.569 and 120.57, Florida Statutes, shall be tolled to allow mediation of the disputed District decision. The mediation must be concluded within 60 days of the date of the parties' written agreement, or such other timeframe agreed to by the parties in writing. Any mediation agreement must include provisions for selecting a mediator, a statement that each party shall be responsible for paying its pro-rata share of the costs and fees associated with mediation, and the mediating parties' understanding regarding the confidentiality of discussions and documents introduced during mediation. If mediation results in settlement of the administrative dispute, the District will enter a final order consistent with the settlement agreement. If mediation terminates without settlement of the dispute, the District will notify all the parties in writing that the administrative hearing process under Sections 120.569 and 120.57, Florida Statutes, is resumed. Even if a party chooses not to engage in formal mediation, or if formal mediation does not result in a settlement agreement, the District will remain willing to engage in informal settlement discussions.
3. A person whose substantial interests are or may be affected has the right to an informal administrative hearing pursuant to Sections 120.569 and 120.57(2), Florida Statutes, where no material facts are in dispute. A petition for an informal hearing must also comply with the requirements set forth in Rule 28-106.301, Florida Administrative Code.

Notice Of Rights

4. A petition for an administrative hearing is deemed filed upon receipt of the complete petition by the District Clerk at the District Headquarters in Palatka, Florida during the District's regular business hours. The District's regular business hours are 8:00 a.m. – 5:00 p.m., excluding weekends and District holidays. Petitions received by the District Clerk after the District's regular business hours shall be deemed filed as of 8:00 a.m. on the District's next regular business day. The District's acceptance of petitions filed by e-mail is subject to certain conditions set forth in the District's Statement of Agency Organization and Operation (issued pursuant to Rule 28-101.001, Florida Administrative Code), which is available for viewing at floridaswater.com. These conditions include, but are not limited to, the petition being in the form of a PDF or TIFF file and being capable of being stored and printed by the District. Further, pursuant to the District's Statement of Agency Organization and Operation, attempting to file a petition by facsimile is prohibited and shall not constitute filing.
5. Failure to file a petition for an administrative hearing within the requisite timeframe shall constitute a waiver of the right to an administrative hearing. (Rule 28-106.111, Florida Administrative Code).
6. The right to an administrative hearing and the relevant procedures to be followed are governed by Chapter 120, Florida Statutes, Chapter 28-106, Florida Administrative Code, and Rule 40C-1.1007, Florida Administrative Code. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means the District's final action may be different from the position taken by it in this notice. A person whose substantial interests are or may be affected by the District's final action has the right to become a party to the proceeding, in accordance with the requirements set forth above.
7. Pursuant to Section 120.68, Florida Statutes, a party to the proceeding before the District who is adversely affected by final District action may seek review of the action in the District Court of Appeal by filing a notice of appeal pursuant to Rules 9.110 and 9.190, Florida Rules of Appellate Procedure, within 30 days of the rendering of the final District action.
8. A District action is considered rendered, as referred to in paragraph no. 7 above, after it is signed on behalf of the District and filed by the District Clerk.
9. Failure to observe the relevant timeframes for filing a petition for judicial review as described in paragraph no. 7 above will result in waiver of that right to review.

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing Notice of Rights has been sent to the permittee:

Tradewinds Utilities Inc
PO Box 5220
Ocala, FL 34478-5220

This 27th day of February, 2015.



Margaret Daniels, Bureau Chief
Bureau of Regulatory Support
St. Johns River Water Management District
4049 Reid Street
Palatka, FL 32177-2529
(386) 329-4570

Permit Number: 2995-6

NOTICING INFORMATION

Dear Permittee:

Please be advised that the St. Johns River Water Management District will not publish a notice in the newspaper advising the public that it has issued a permit for this project.

Newspaper publication, using the District's notice form, notifies members of the public of their right to challenge the issuance of the permit. If proper notice is given by newspaper publication, then there is a 21-day time limit for someone to file a petition for an administrative hearing to challenge the issuance of the permit.

To close the point of entry for filing a petition, you may publish (at your own expense) a one-time notice of the District's decision in a newspaper of general circulation within the affected area as defined in Section 50.011 of the Florida Statutes. If you do not publish a newspaper notice to close the point of entry, the time to challenge the issuance of your permit will not expire and someone could file a petition even after your project is constructed.

A copy of the notice form and a partial list of newspapers of general circulation are attached for your convenience. However, you are not limited to those listed newspapers. If you choose to close the point of entry and the notice is published, the newspaper will return to you an affidavit of publication. In that event, it is important that you either submit a scanned copy of the affidavit by emailing it to compliancesupport@sjrwmd.com (preferred method) **or** send a copy of the original affidavit to:

Margaret Daniels, Bureau Chief
Bureau of Regulatory Support
4049 Reid Street
Palatka, FL 32177

If you have any questions, please contact the Bureau of Regulatory Support at (386) 329-4570.

Sincerely,



Margaret Daniels, Bureau Chief
Bureau of Regulatory Support

NOTICE OF AGENCY ACTION TAKEN BY THE
ST. JOHNS RIVER WATER MANAGEMENT DISTRICT

Notice is given that on _____ the District issued Permit No. _____ for a Consumptive Use Permit to serve (type of project) _____ activities. The total allocation authorized is _____ mgd of (groundwater/surface water). The project is located in _____ County, Section(s) _____, Township _____ South, Range _____ East. The permit applicant is _____.

If you wish to receive a copy of a Technical Staff Report (TSR) that provides the St. Johns River Water Management District (District) staffs' analysis on the above-listed compliance report(s) and associated permit(s), please submit your request to Bureau Chief, Bureau of Regulatory Support, P.O. Box 1429, Palatka, FL 32178-1429. You may view the TSR by going to the Permitting section of the District's website at floridaswater.com/permitting/index.html. To obtain information on how to find and view a TSR, visit https://permitting.sjrwmd.com/epermitting/html/EP_FAQs.html, and then follow the directions provided under "How to find a Technical Staff Report (TSR) or other application file documents."

A person whose substantial interests are or may be affected has the right to request an administrative hearing by filing a written petition with the District. Pursuant to Chapter 28-106 and Rule 40C-1.1007, Florida Administrative Code (F.A.C.), the petition must be filed (received) either by delivery at the office of the District Clerk at District Headquarters, P. O. Box 1429, Palatka Florida 32178-1429 (4049 Reid St., Palatka, FL 32177) or by e-mail with the District Clerk at Clerk@sjrwmd.com, within twenty-one (21) days of newspaper publication of the notice of District decision (for those persons to whom the District does not mail or email actual notice). A petition for an administrative hearing is deemed filed upon receipt of the complete petition by the District Clerk at the District Headquarters in Palatka, Florida during the District's regular business hours. The District's regular business hours are 8 a.m. – 5 p.m., excluding weekends and District holidays. Petitions received by the District Clerk after the District's regular business hours shall be deemed filed as of 8 a.m. on the next regular District business day. A petition must comply with Sections 120.54(5)(b)4. and 120.569(2)(c), Florida Statutes (F.S.), and Chapter 28-106, F.A.C. The District's acceptance of petitions filed by e-mail is subject to certain conditions set forth in the District's Statement of Agency Organization and Operation (issued pursuant to Rule 28-101.001, F.A.C.), which is available for viewing at floridaswater.com. The District will not accept a petition sent by facsimile (fax). Mediation may be available if you meet the conditions stated in the full Notice of Rights (see last paragraph).

The right to an administrative hearing and the relevant procedures to be followed are governed by Chapter 120, F.S., Chapter 28-106, F.A.C., and Rule 40C-1.1007, F.A.C. Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means the District's final action may be different from the position taken by it in this notice. **Failure to file a petition for an administrative hearing within the requisite time frame shall constitute a waiver of the right to an administrative hearing. (Rule 28-106.111, F.A.C.)**

If you wish to do so, please visit http://floridaswater.com/nor_dec/ to read the complete Notice of Rights to determine any legal rights you may have concerning the District's decision(s) on the Consumptive Use Permit Application(s) described above. You can also request the Notice of Rights by contacting the Bureau Chief, Bureau of Regulatory Support, P. O. Box 1429, Palatka, FL 32178, phone (386)329-4570.

NEWSPAPER ADVERTISING

ALACHUA

The Alachua County Record, Legal Advertising
P. O. Box 806
Gainesville, FL 32602
352-377-2444/ fax 352-338-1986

BRAFORD

Bradford County Telegraph, Legal Advertising
P. O. Drawer A
Starke, FL 32901
904-964-6305/ fax 904-964-8628

CLAY

Clay Today, Legal Advertising
1560 Kinsley Ave., Suite 1
Orange Park, FL 32073
904-264-3200/ fax 904-264-3285

FLAGLER

Flagler Tribune, c/o News Journal
P. O. Box 2831
Daytona Beach, FL 32120-2831
386- 681-2322

LAKE

Daily Commercial, Legal Advertising
P. O. Drawer 490007
Leesburg, FL 34749
352-365-8235/fax 352-365-1951

NASSAU

News-Leader, Legal Advertising
P. O. Box 766
Fernandina Beach, FL 32035
904-261-3696/fax 904-261-3698

ORANGE

Sentinel Communications, Legal Advertising
633 N. Orange Avenue
Orlando, FL 32801
407-420-5160/ fax 407-420-5011

PUTNAM

Palatka Daily News, Legal Advertising
P. O. Box 777
Palatka, FL 32178
386-312-5200/ fax 386-312-5209

SEMINOLE

Seminole Herald, Legal Advertising
300 North French Avenue
Sanford, FL 32771
407-323-9408

BAKER

Baker County Press, Legal Advertising
P. O. Box 598
Maclenny, FL 32063
904-259-2400/ fax 904-259-6502

BREVARD

Florida Today, Legal Advertising
P. O. Box 419000
Melbourne, FL 32941-9000
321-242-3832/ fax 321-242-6618

DUVAL

Daily Record, Legal Advertising
P. O. Box 1769
Jacksonville, FL 32201
904-356-2466 / fax 904-353-2628

INDIAN RIVER

Vero Beach Press Journal, Legal Advertising
P. O. Box 1268
Vero Beach, FL 32961-1268
772-221-4282/ fax 772-978-2340

MARION

Ocala Star Banner, Legal Advertising
2121 SW 19th Avenue Road
Ocala, FL 34474
352-867-4010/fax 352-867-4126

OKEECHOBEE

Okeechobee News, Legal Advertising
P. O. Box 639
Okeechobee, FL 34973-0639
863-763-3134/fax 863-763-5901

OSCEOLA

Little Sentinel, Legal Advertising
633 N. Orange Avenue
Orlando, FL 32801
407-420-5160/ fax 407-420-5011

ST. JOHNS

St. Augustine Record, Legal Advertising
P. O. Box 1630
St. Augustine, FL 32085
904-819-3436

VOLUSIA

News Journal Corporation, Legal Advertising
P. O. Box 2831
Daytona Beach, FL 32120-2831
386 681-2322



CONSUMPTIVE USE PERMIT APPLICATION



St. Johns River Water Management District

4049 Reid Street • P.O. Box 1429 • Palatka, FL 32178-1429 • (386) 329-4500
Application forms may also be submitted electronically at *floridaswater.com*.

SECTION I – CONTACT INFORMATION

If necessary, attach additional sheets if there are multiple applicants, owners, agents, etc.

1. **APPLICANT** (Complete legal name in which permit should be issued)

NAME: **Tradewinds Utilities Inc**

If applicant is a business, provide a contact person: **Charles DeMenzes**

ADDRESS: **PO Box 5220**

CITY, STATE, ZIP: **Ocala FL 34478-5220**

PHONE: **(352) 622-4949** CELL PHONE: _____

EMAIL ADDRESS: **charlie@altfo.com**

Do you want all correspondence to be transmitted electronically to this email address? Yes No

Applicant is: Owner Lessee* Other (explain) _____

*Attach copy of current lease, or written authorization from property owner

2. **OWNER** (If different than applicant)

NAME: **Charles DeMenzes, Tradewinds Utilities Inc**

ADDRESS: **PO Box 5220**

CITY, STATE, ZIP: **Ocala FL 34478-5220**

PHONE: _____ CELL PHONE: _____

EMAIL ADDRESS: _____

3. **AGENT OR CONSULTANT** Address all correspondence to the person below? Yes No

NAME: _____

COMPANY NAME (if applicable): _____

ADDRESS: _____

CITY, STATE, ZIP: _____

PHONE: _____ CELL PHONE: _____

EMAIL ADDRESS: _____

4. **COMPLIANCE CONTACT** (Person responsible for ensuring that the permit conditions are met)

NAME: **Charlie deMenzes, Tradewinds Utilities< inc.**

ADDRESS: **PO Box 5220**

CITY, STATE, ZIP: **Ocala FL 34478**

PHONE: **(352) 622-4949** CELL PHONE: _____

EMAIL ADDRESS: **charlie@altfo.com**

SECTION II – APPLICATION INFORMATION

For permit application guidance, please refer to the Applicant’s Handbook, Consumptive Uses of Water, which is incorporated by reference in Rule 40C-2.101(1)(a), F.A.C. (A.H.). Please complete all fields. Enter N/A for any fields that are not applicable.

1. **TYPE OF APPLICATION:** New Modification Renewal
 If this application is for a modification, please describe the modification request and the reason the modification is necessary. **To include wholesale water to be sent to Marion County Utilities for a new development called Millwood Estates.**

2. **CONSUMPTIVE USE PERMIT NO.** (if application is for renewal or modification): 2995

3. **REQUESTED PERMIT DURATION:** 20 years 14 years (up to 20 years)
 This project qualifies for a duration greater than 20 years, per Section 373.236, F.S.

4. **PROJECT NAME:** Tradewinds Utilities Inc **COUNTY:** Marion
PHYSICAL ADDRESS: PO Box 5220 Ocala 34478

5. **RELATED PERMITS** (for projects other than Public Supply)
 - ENVIRONMENTAL RESOURCE PERMIT: MSSW/ERP No(s): _____
 - INDUSTRIAL WASTEWATER (IWW) PERMIT: IWW Permit No(s): _____
 - NATIONAL POLLUTION DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT:
 NPDES Permit No(s): _____

SECTION III – USE TYPE CATEGORIES

Please check all applicable use categories associated with this application and complete the associated supplemental form(s) indicated. The **Minor Individual Supplemental Form** (Form No. 40C-2.900(2)) can be completed in lieu of Supplemental Forms A through G if all of the following criteria are met:

- Use is less than 100,000 gallons per day
- Withdrawal facilities (wells or pump intakes) are less than 8-inches diameter
- Combined withdrawal capacity is less than 1,000,000 gallons per day
- Use is not for Mining/Dewatering
- Use is for Public Supply where end users are not individually metered

Use Type Category	Supplemental Form
<input type="checkbox"/> Agricultural (e.g., crops, livestock, nursery, aquaculture, pasture)	Form A Form No. 40C-2.900(1)(a)
<input type="checkbox"/> Commercial / Industrial (e.g., service business, food and beverage production, cooling and heating, commercial attraction, manufacturing, chemical processing, power generation)	Form B Form No. 40C-2.900(1)(b)
<input type="checkbox"/> Landscape / Recreation (e.g., irrigation of parks, cemeteries, landscaped areas, golf courses, athletic fields, playgrounds)	Form C Form No. 40C-2.900(1)(c)
<input type="checkbox"/> Mining / Dewatering (e.g., water use or removal associated with construction or excavation)	Form D Form No. 40C-2.900(1)(d)
<input checked="" type="checkbox"/> Public Supply (e.g., public or privately owned potable water supply utility)	Form E Form No. 40C-2.900(1)(e)
<input type="checkbox"/> Environmental / Other (e.g., aquifer remediation, environmental enhancement, or the use of water for other purposes)	Form F Form No. 40C-2.900(1)(f)

SECTION IV – SOURCES OF WATER
(please attach additional facility tables if necessary)

SUMMARY OF GROUNDWATER (WELL) FACILITIES

Site or Wellfield Name ¹	District ID (if available)	Florida Unique Well ID (if available)	Owner's Well Name	Capacity (gpm)	Pump Type ²	Casing Diameter (inches) ³	Casing Depth (feet)	Total Depth (feet)	Status ⁴ (include date if proposed)	Type of Water Use Accounting Method ⁵	Last Meter Check / Method Validation ⁶	Type of Water Use (refer to Section III)
Tradewinds	19078		1	250	Submersible	8	35	240	Active		09-JAN-15	
Tradewinds	19079		2	150	Submersible	8	35	160	Active		08-JAN-15	
Tradewinds	19080		3	950	Turbine	12	38	240	Active	Flow Meter	09-JAN-15	

- 1 If project consists of separate or non-contiguous pieces of property or wellfields
- 2 Centrifugal (impeller located above water level), submersible (pump set below water level), turbine (motor at ground surface that drives an impeller below water level), vacuum underdrain (typically used for dewatering), well point system (typically used for dewatering), or other (any pump that does not fall into one of the categories previously listed)
- 3 The casing diameter is defined as the largest permanent water-bearing casing of the well at land surface.
- 4 Active (currently in use), Inactive (capped, does not have power, or the connection to the water supply system has been severed), Abandoned (plugged and abandoned in accordance with 40C-3, Florida Administrative Code), or Proposed (include anticipated construction date)
- 5 Flow Meter, Time Clock / Pump Run Time, Hour Meter, Digital Electric Meter, Analog Electric Meter
- 6 Enter the date of the last flow meter accuracy check or alternative method validation

SUMMARY OF SURFACE WATER (PUMP) FACILITIES

Site Name ¹	District ID (if available)	Owner's Pump Name	Pump Capacity (gpm)	Pump Intake Diameter (inches)	Pump Type ²	Name of Surface Water Body	Type of Surface Water Body ³	Status ⁴ (include date if proposed)	Type of Water Use Accounting Method ⁵	Last Meter Check / Method Validation ⁶	Type of Water Use (refer to Section III)

1 If project consists of separate or non-contiguous pieces of property or wellfields

2 Centrifugal (impeller located above water level), submersible (pump set below water level), turbine (motor at ground surface that drives an impeller below water level), hydraulic dredge pump (typically used for mining), hydraulic dewatering pump (typically used for construction or mining), other (any pump that does not fall into one of the categories previously listed)

3 Ditch/canal, lake/pond (natural), lake/pond (artificial), river/creek, spring, mining/borrow pit

4 Active (currently in use), Inactive (does not have power, or the connection to the water supply system has been severed), Proposed

5 Flow Meter, Time Clock / Pump Run Time, Hour Meter, Digital Electric Meter, Analog Electric Meter

6 Enter the date of the last flow meter accuracy check or alternative method validation

SUMMARY OF CONNECTION POINT FACILITIES

Connection points include locations where potable or non-potable water (including reclaimed water) purchased from a water supplier enters a project site.

Site Name ¹	District ID (if available)	Owner's Connection Point Name	Water Supplier Name ²	Type of Surface Water Body ³	Status ⁴ (include date if proposed)	Type of Water Use Accounting Method ⁵	Last Meter Check / Method Validation ⁶	Type of Water Use (refer to Section III)

1 If project consists of separate or non-contiguous pieces of property or wellfields

2 Name of water supplier that provides water to the project through the connection point

3 Reclaimed water holding pond, stormwater management system

4 Active (currently in use), Inactive (the connection to the water supply system has been severed), Proposed

5 Flow Meter, Time Clock / Pump Run Time, Hour Meter, Digital Electric Meter, Analog Electric Meter

6 Enter the date of the last flow meter accuracy check or alternative method validation

**SECTION V –
USE OF LOWEST QUALITY WATER AND EVALUATION OF RECLAIMED WATER FEASIBILITY**

The applicant may be required to evaluate the feasibility of utilizing reclaimed water and/or other lower quality water sources. The feasibility analysis must be completed as outlined in Section 2.3.3(e), A.H.

SECTION VI – SUMMARY OF REQUESTED WATER USE

Summarize the requested water use from each supplemental form (Agricultural, Public Supply, Commercial / Industrial, etc.) in the table below. Provide projections for each source, at five-year intervals, for the requested permit duration. If the requested permit duration exceeds 20 years, please attach a supplemental sheet providing additional five-year projections for each source.

Year	Requested Amounts and Source(s) of Water				Total Requested Water Use (mgy)
	Floridan (mgy ²)	(mgy)	(mgy)	(mgy)	
Other/Unknown	334000				334000
2026 - 2031	334000				334000
2031 - 2035	334000				334000

¹ Provide the name of the water source. Examples include upper Floridan aquifer, stormwater pond, surficial aquifer, Davis Lake.

² Million gallons per year

SECTION VII – AQUIFER STORAGE AND RECOVERY *(complete if applicable)*

ASR Facility Name	Source of Stored Water ¹	Storage Aquifer Name	Recovery Water Destination	Projected Demand Average (mgy)	Projected Demand Maximum (mgy)	Projected Injected Average (mgy)	Projected Injected Maximum (mgy)

¹ Aquifer name, surface water body, water treatment plant name.

Please describe any projected increases or decreases (from historical average) in the amounts stored or recovered.

SECTION VIII – IMPACT EVALUATION

When determining whether the permit applicant has provided reasonable assurances that the conditions for issuance in Rule 40C-2.301, F.A.C., are met, the District will consider the projected impacts of the proposed consumptive use on an individual and cumulative basis. In order to provide reasonable assurance, studies and/or impact evaluations may be required. Please refer to the Applicant's Handbook for guidance regarding the impact evaluations and attach analyses, if applicable.

SECTION IX – APPLICANT CERTIFICATION

I certify that to the best of my knowledge and belief, all of the information provided on this form and in any attachment to it is correct. I also certify that I have legal authority to execute this application for the applicant and certify that the applicant will have sufficient legal authority to undertake the activities described herein. I understand that any material false statement in an application to continue, initiate, or modify a use, or any material false statement in any report or statement of fact required of the permittee, may result in revocation, in whole or in part, of the permit (Section 373.243(1), F.S.). With advance notice, I agree to provide St. Johns River Water Management District staff, with proper identification, entry to the project site for the purpose of performing analyses of the site for determining whether the conditions for issuance will be met. Further, if a permit is granted, I agree that, with advance notice, District staff with proper identification shall have permission to enter, inspect, collect samples, and take measurements of permitted facilities to determine compliance with the permit conditions and permitted plans and specifications.

(If applicable) I authorize _____ to act as my agent for permit application coordination.

Charles DeMenzes

APPLICANT'S NAME
(print or type)

APPLICANT'S SIGNATURE

03-DEC-21

DATE

AUTHORIZED AGENT'S NAME
(print or type)

AUTHORIZED AGENT'S SIGNATURE

DATE

When an application that will be considered by the District's Governing Board is complete, the applicant will be notified of the date of the hearing (Governing Board meeting) at which the application will be considered at least 14 days in advance. The Governing Board normally meets on the second Tuesday of the month.

SECTION X – APPLICANT CHECKLIST

The following items must be included with the permit application submittal:

- Proof of Property Control (e.g., deed, lease), if not already on file with the District
- Application Fee (refer to online fee schedule or Applicant's Handbook)
- Location/Site Map
- Supplemental Form(s) and associated supporting information (e.g., maps, calculations)
- Water Conservation Plan

Additional Addresses

Applicant	
------------------	--

Land Owner	
-------------------	--

Agent	
--------------	--

Compliance Contact	
---------------------------	--

Consultant	Vivian J. Bielski Andreyev Engineering, Inc. 14338 Rialto Ave Brooksville FL 34613
-------------------	---

Water Use Reporting (EN-50) Contact	Charlie deMenzes Tradewinds Utilities< inc. PO Box 5220
--	---

	Ocala FL 34478
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Attorney	
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ATTACHMENT B

Florida's DEP 2020 Inspection Report



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

June 10, 2020

Charles Demenzes, Owner
Tradewinds Utilities Inc.
NE 43rd Pl. & 27th Ct.
Ocala, FL 34478
charlie@altfo.com

Re: Tradewinds Village
PW Facility ID #3424620
Marion County

Dear Mr. Demenzes:

Department personnel conducted an inspection of the above-referenced facility on May 22, 2020. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records, and any non-compliance items which may have been identified at the time of the inspection have been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Amada Fernandez at 407-897-4159 or via e-mail at Amada.M.Fernandez@FloridaDEP.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jill Farris".

Jill Farris, Manager
Central District
Florida Department of Environmental Protection

Enclosure: Inspection Report

cc: Amada Fernandez and Jill Farris, FDEP
UTILITIESMANAGEMENTTEAM@GMAIL.COM
Steve McGee, SMCGEE1953@YAHOO.COM

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 P.O. Box 5220, Ocala, FL 34478
Contact Person Charles Demenzes Title President Phone 352-622-4949
This Survey Date 5/22/20 Last Survey Date 7/13/17 Last Compliance Inspection Date 7/31/08

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 Plant

Comments _____

CERTIFIED OPERATOR: Yes

Operator(s) & Certification Class-Number:
Steve McGee C-1854

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

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

Non-consecutive Days? Yes No N/A

Comments *Visit must total 0.6 hr/week

MONTHLY OPERATION REPORTS (MORs)

MORs submitted regularly? Yes No N/A

Data missing from MORs? No Yes N/A

Average Day (from MORs) 91,640 gpd

Maximum Day (from MORs) 250,000 gpd

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 MQ Diesel - MQP30IZ

Capacity of Standby (kW) 100

Switchover: Automatic Manual

Hrs Operated Under Load 4 hrs/mo.

What equipment does it operate?

Well Pumps Backup wells

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 N/A

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 Yes Date Unknown

Comments _____

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	N/A
	Reuse Water	N/A	N/A	N/A
	WW Plumbing	>100'	>100'	>100'
	Other Sanitary Hazard	None observed	None observed	None observed
PUMP	Type	Submersible	Submersible	Vertical turbine
	Manufacturer Name	Sta-Rite	Sta-Rite	Goulds
	Model Number	Unknown	Unknown	Unknown
	Rated Capacity (gpm)	185	185	950
	Motor Horsepower	10	10	75
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	Yes	

COMMENTS Well 1 and 2 serve as back-up wells. *Well 2 had threaded raw tap. Well 3 had algae on pump and wellpad.

CHLORINATION (Disinfection)

Type: Gas Hypo
 Make (2) Chem-Tech Capacity 30 gpd
 Chlorine Feed Rate 80% stroke
 Avg. Amount of Cl₂ gas used N/A
 Chlorine Residuals: Plant 0.69 Remote 0.53
 Remote tap location Terry's Sports Bar & Grill
 DPD Test Kit: On-site With operator
 None Not Used Daily
 Injection Points Prior to elevated tank
 Booster Pump Info N/A
 Comments _____

STORAGE FACILITIES

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

Tank Type/Number	H1/ft	H2/ft*	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	40/60'
Access Secured	Yes	Yes	Yes
Access Manhole	Yes	Yes	Yes
Tank Sample Tap Location	On tank	On tank	Discharge piping
Date of Inspection	N/A	N/A	12/19
Date of Cleaning	N/A	N/A	12/19

Comments H1 and H2 offline since about 2015.

Chlorine Gas Use Requirements	Chlorine Gas Use		Comments
	YES	NO	
Dual System	<input type="checkbox"/>	<input type="checkbox"/>	Diagonally crossed out
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"/>	

HIGH SERVICE PUMPS

Pump Number		Diagonally crossed out
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:

Areas of Concern	Rule	Corrective Action	Date Corrected	Significant Deficiency?
Vertical turbine pump and well pad had biogrowth.	62-555.350(2)	Thoroughly clean.	6/2/20 – Debbie Dillon stated in an email that algae growth had been treated with chlorine and removed.	No
Raw sample tap is threaded. [Well 2 had threaded raw tap.]	62-555.320(8)(b)2	Provide a downward opening, smooth-nosed raw water sampling tap with no threads, at least 12" above well pad, located before the check valve if possible & before all treatment facilities & chemical application points.	6/2/20 – Debbie Dillon stated in an email that the threaded tap had been trimmed and was no longer threaded.	No
No record that the calibration of the finished-drinking-water flow meter has been checked.	62-555.350(2)	The calibration of finished-drinking-water flow meters should be checked at least once every 5 years.	6/4/20 – Flow meter calibration was completed 6/4/20.	No

MONITORING REMINDER:

- Nitrate and nitrite samples are required to be collected from the point of entry (POE) to the distribution system annually. The 2020 results have not been received.
- The consumer confidence report (CCR) must be delivered to consumers and the Department no later than July 1, 2020, and certification of delivery of the CCR must be submitted to the Department no later than August 10, 2020.
- Monitoring schedules are available on the Central District’s Drinking Water site:

<https://floridadep.gov/central/central/content/resources-drinking-water-facilities-and-operators-central-district>

COMMENTS:

- Contact FRWA (Florida Rural Water Association) at 850-668-2746, or frwa@frwa.net, for free technical assistance with your system. FRWA has extended benefits offered to members.
- Provide documentation that the finished-drinking-water meter has been calibrated at least every 5 years.
 Checking the calibration of finished-drinking-water meters at treatment plants shall be performed in accordance with the equipment manufacturer's recommendations or in accordance with a written preventive maintenance program established by the supplier of water. [Rule 62-555.350(2), F.A.C.]
- Suppliers of water shall submit written notification to the Department before beginning work or alterations to the public water system. Each notification shall be submitted to the appropriate Department of Environmental Protection District Office or Approved County Health Department and shall include the following: a description of the scope, purpose, and location of the work or alterations; and assurance that the work or alterations will comply with

applicable requirements listed in Rule 62-555.330, F.A.C. Suppliers of water may begin such work or alterations 14 days after providing notification to the Department unless they are advised by the Department that the notification is incomplete or that a construction permit is required.

- Suppliers of water shall telephone the SWO at 1-800-320-0519 immediately (i.e., within two hours) after discovery of any actual or suspected sabotage or security breach, or any suspicious incident, involving a public water system. [Rule 62-555.350(10)(a), F.A.C.]
- Suppliers of water shall telephone, and speak directly to a person at, the appropriate DEP District Office as soon as possible, but never later than noon of the next business day, in the event of any of the following emergency or abnormal operating conditions:
 - The occurrence of any abnormal color, odor, or taste in a public water system's raw or finished water;
 - The failure of a public water system to comply with applicable disinfection requirements; or
 - The breakdown of any water treatment or pumping facilities, or the break of any water main, in a public water system if the breakdown or break is expected to adversely affect finished-water quality, interrupt water service to 150 or more service connections or 350 or more people, interrupt water service to any one service connection for more than eight hours, or necessitate the issuance of a precautionary "boil water" notice in accordance with the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(10)(b), F.A.C.]
- Suppliers of water shall notify affected water customers in writing or via telephone, newspaper, radio, or television; and telephone, and speak directly to a person at, the appropriate DEP District Office by no later than the previous business day before taking PWS components out of operation for planned maintenance or repair work if the work is expected to adversely affect finished-water quality, interrupt water service to 150 or more service connections or 350 or more people, interrupt water service to any one service connection for more than eight hours, or necessitate the issuance of a precautionary "boil water" notice in accordance with the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(10)(d), F.A.C.]
- Suppliers of water shall issue precautionary "boil water" notices as required or recommended in the Department of Health's "Guidelines for the Issuance of Precautionary Boil Water Notices" as adopted in Rule 62-555.335, F.A.C. [Rule 62-555.350(11), F.A.C.]

Amada Fernandez

Inspector Signature

Amada Fernandez

Printed Name

Environmental Specialist II

Title

6/10/20

Date

Jill Farris

Reviewer Signature

Jill Farris

Printed Name

Environmental Manager

Title

6/10/20

Date

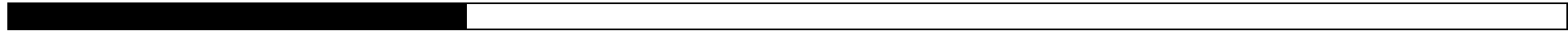
ATTACHMENT C

Compliance Historical Documentation



MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

See page 4 for instructions.



A. Public Water System (PWS) Information

PWS Name: TRADEWINDS VILLAGE		PWS Identification Number: 3424620	
PWS Type: <input checked="" type="checkbox"/> Community <input type="checkbox"/> Non-Transient Non-Community <input type="checkbox"/> Transient Non-Community <input type="checkbox"/> Consecutive			
Number of Service Connections at End of Month: 375		Total Population Served at End of Month: 1313	
PWS Owner: CHARLES DEMENZES			
Contact Person:		Contact Person's Title:	
Contact Person's Mailing Address: NE 43 PL & 27TH CT		City:	State: Zip Code:
Contact Person's Telephone Number:		Contact Person's Fax Number:	
Contact Person's E-Mail Address:			

B. Water Treatment Plant Information

Plant Name: TRADEWINDS VILLAGE		Plant Telephone Number: 352-622-4949		
Plant Address: NE 43 PL & 27TH CT		City: OCALA	State: FL Zip Code: 34478	
Type of Water Treated by Plant: <input checked="" type="checkbox"/> Raw Ground Water <input type="checkbox"/> Purchased Finished Water				
Permitted Maximum Day Operating Capacity of Plant, gallons per day: 950000				
Plant Category (per subsection 62-699.310(4), F.A.C.): 5		Plant Class (per subsection 62-699.310(4), F.A.C.): 5		
Licensed Operators	Name	License Class	License Number	Day(s)/Shift(s) Worked
Lead/Chief Operator:	Reuben Law	B	0013153	
Other Operators:	Reuben Law	B	0013153	6 Days per week.

II. Certification by Lead/Chief Operator

I, the undersigned water treatment plant operator licensed in Florida, am the lead/chief operator of the water treatment plant identified in Part I of this report. I certify that the information provided in this report is true and accurate to the best of my knowledge and belief. I certify that all drinking water treatment chemicals used at this plant conform to NSF International Standard 60 or other applicable standards referenced in subsection 62-555.320(3), F.A.C. I also certify that the following additional operations records for this plant were prepared each day that a licensed operator staffed or visited this plant during the month indicated above: (1) records of amounts of chemicals used and chemical feed rates; and (2) if applicable, appropriate treatment process performance records. Furthermore, I agree to retain these additional operations records at the plant site for at least ten years and to make them available for review upon request.

<i>Reuben Law</i>	(02/03/2022)	Reuben Law	0013153
Signature and Date		Printed or Typed Name	License Number

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

PWS Identification Number:	Plant Name:
----------------------------	-------------

III. Daily Data for the Month/Year of:

Means of Achieving Four-Log Virus Inactivation/Removal: *	Free Chlorine	Chlorine Dioxide	Ozone	Combined Chlorine (Chloramines)
Ultraviolet Radiation	Other (Describe):			

Type of Disinfectant Residual Maintained in Distribution System:	Free Chlorine	Combined Chlorine (Chloramines)	Chlorine Dioxide
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Day of the Month	Hours Plant in Operation	Net Quantity of Finished Water Produced, gal	CT Calculations, or UV Dose, to Demonstrate Four-Log Virus Inactivation, if Applicable*										Lowest Residual Disinfectant Concentration at Remote Point in Distribution System, mg/L	Emergency or Abnormal Operating Conditions; Repair or Maintenance Work that Involves Taking Water System Components Out of Operation
			CT Calculations					UV Dose						
			Peak Flow Rate, gpd	Lowest Residual Disinfectant Concentration (C) Before or at First Customer During Peak Flow, mg/L	Disinfectant Contact Time (T) at C Measurement Point During Peak Flow, minutes	Lowest CT Provided Before or at First Customer During Peak Flow, mg-min/L	Temp. of Water, °C	pH of Water, if Applicable	Minimum CT Required, mg-min/L	Lowest Operating UV Dose, mW-sec/cm ²	Minimum UV Dose Required, mW-sec/cm ²			
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2														
3														
4														
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28														
29														
30														
31														

Total														
Average														
Maximum														

* Refer to the instructions for this report to determine which plants must provide this information.

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

PWS Identification Number:	Plant Name:
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IV. Summary of Use of Polymer Containing Acrylamide, Polymer Containing Epichlorohydrin, and Iron or Manganese Sequestrant for the Year: *

A. Is any polymer containing the monomer acrylamide used at the water treatment plant? No Yes, and the polymer dose and the acrylamide level in the polymer are as follows:

Polymer Dose, ppm =	Acrylamide Level, % [†] =
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B. Is any polymer containing the monomer epichlorohydrin used at the water treatment plant? No Yes, and the polymer dose and the epichlorohydrin level in the polymer are as follows:

Polymer Dose, ppm =	Epichlorohydrin Level, % [†] =
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C. Is any iron or manganese sequestrant used at the water treatment plant? No Yes, and the type of sequestrant, sequestrant dose, etc., are as follows:

Type of Sequestrant (polyphosphate or sodium silicate):

Sequestrant Dose, mg/L of phosphate as PO ₄ or mg/L of silicate as SiO ₂ =
--

If sodium silicate is used, the amount of added plus naturally occurring silicate, in mg/L as SiO ₂ =
--

* Complete and submit Part IV of this report only with the monthly operation report for December of each year and only for water treatment plants using polymer containing acrylamide, polymer containing epichlorohydrin, and/or an iron and manganese sequestrant.

[†] Acrylamide and epichlorohydrin levels may be based on the polymer manufacturer's certification or on third-party certification.

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

INSTRUCTIONS: This report shall be completed and submitted by all public water systems, except transient non-community water systems using only ground water and serving only businesses other than public food service establishments, that treat raw ground water or purchased finished water. WITHIN TEN DAYS AFTER THE END OF EACH MONTH, complete this report and submit it to the appropriate Department of Environmental Protection District Office or Approved County Health Department. All information provided in this report shall be typed or printed in ink. Complete and submit Parts I through III of this report every month; complete and submit Part IV of this report only with the monthly operation report for December of each year and only if using polymer containing acrylamide, polymer containing epichlorohydrin, and/or an iron and manganese sequestrant. NOTE THAT A SEPARATE MONTHLY OPERATION REPORT IS REQUIRED FOR EACH PLANT TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER.

The following specific instructions are for Part II of this report.

Process performance records shall be kept for the following treatment processes: coagulation/flocculation, sedimentation, filtration, lime-soda ash softening, ion exchange softening, nanofiltration and reverse osmosis, and electrodialysis. Coagulation/flocculation records should include source water temperature, pH, turbidity, color, and alkalinity and process effluent pH and alkalinity in addition to chemical feed rates. Sedimentation records should include process effluent turbidity and sludge volume produced. Filtration records should include process effluent turbidity and color, number of filters in service, filtration rates, unit filter run volumes, head losses, length of filter runs, frequency of backwash, amount of backwash water used, duration of backwash, and backwash rates. Lime-soda ash softening records should include source water and process effluent hardness in addition to records for coagulation/flocculation, sedimentation, and filtration. Ion exchange softening records should include feed and bypass flows, blend rate, and salt and brine used. Nanofiltration and reverse osmosis records should include feed, product, and brine flows; feed pressure, temperature, pH, conductivity, and turbidity; product pH and conductivity; and brine pH and conductivity. Electrodialysis records should include polarity, feed temperature and total dissolved solids, product conductivity and total dissolved solids, dilute flow rate, brine make-up, pressures, and volts/amps.

The following specific instructions are for the table in Part III of this report.

HOURS PLANT IN OPERATION. For each day the plant is in operation, enter the number of hours that the plant is in operation.

NET QUANTITY OF FINISHED WATER PRODUCED. Enter the net quantity of finished water, excluding any filter backwash water, produced by the plant for each day the plant is in operation; compute and enter the total net quantity of finished water produced for the month; compute and enter the average daily net quantity of finished water produced for the month; and enter the maximum day net quantity of finished water produced for the month. If the plant is staffed during every hour it is in operation or if the plant has flow recording equipment, enter the net quantity of finished water produced between 12:00 midnight and 12:00 midnight for each day the plant is in operation. If the plant is not staffed during some hours it is in operation and if the plant does not have flow recording equipment, read the totalizing flow meter(s) (or the elapsed time clock[s]) at approximately the same time each day the plant is staffed or visited by a licensed operator and enter the net quantity of finished water produced during the one or more calendar days since the meter(s) (or the elapsed time clock[s]) was(were) last read. For each entry that represents the net quantity of finished water produced during two or more calendar days, place a "}" next to the calendar days covered by the entry and assume the entry is divided evenly between those calendar days for the purpose of determining the maximum day net quantity of finished water produced for the month.

CT CALCULATIONS, OR UV DOSE, TO DEMONSTRATE FOUR-LOG VIRUS INACTIVATION, IF APPLICABLE. Provide this information if the plant is treating raw ground water from wells considered microbially contaminated or susceptible to microbial contamination per paragraph 62-555.315(6)(b) or (f), F.A.C, and beginning no later than January 1, 2006, provide this information if the plant is treating water in a manner that exposes the water during treatment to the open atmosphere and possible microbial contamination. (Aerators and other facilities that are protected from contamination by birds, insects, wind-borne debris, rainfall, and water drainage are not considered to be exposing water to the open atmosphere and possible microbial contamination.)

For each day water is served to the public from a plant that includes chemical disinfection for virus inactivation, enter the lowest residual disinfectant concentration (C) measured before or at the first customer during peak flow, the corresponding disinfectant contact time (T) at the C measurement point during peak flow, and the resulting lowest CT provided before or at the first customer during peak flow. (Disinfectant contact time in pipelines flowing full shall be calculated by dividing the internal volume of the pipeline by the flow rate through the pipeline, and disinfectant contact time in tanks, etc., shall be the time it takes for ten percent of the water to pass through the tank, etc., and shall be determined by tracer studies or by multiplying the theoretical detention time by an appropriate T_{10}/T factor based upon baffling conditions in the tank, etc. Table 1 at the end of these instructions lists appropriate T_{10}/T factors for various baffling conditions.) In addition, for each day water is served to the public from the plant, enter the temperature of the water at the point where C is measured; enter the pH of the water at the point where C is measured if free chlorine is being used for virus inactivation; and with this temperature

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

and pH information, determine and enter the minimum CT required. (Required minimum CT values are listed in Appendix E of the *Guidance Manual for Compliance with the Filtration and Disinfection Requirements for Public Water Systems Using Surface Water Sources*. Tables 2 through 6 at the end of these instructions present the values from Appendix E.)

For each day water is served to the public from a plant that includes ultraviolet (UV) disinfection for virus inactivation, enter the lowest operational UV dose measured and the minimum UV dose required.

LOWEST RESIDUAL DISINFECTANT CONCENTRATION AT REMOTE POINT IN DISTRIBUTION SYSTEM. For each day a water system serving 3,300 or more persons serves water to the public or five days per week, whichever is less, enter the residual disinfectant concentration measured at a point in the distribution system reflecting maximum residence time after disinfectant addition. For each day a water system serving less than 3,300 persons serves water to the public or two days per week, whichever is less, enter the residual disinfectant concentration measured at a point in the distribution system reflecting maximum residence time after disinfectant addition.

EMERGENCY OR ABNORMAL OPERATING CONDITIONS; REPAIR OR MAINTENANCE WORK THAT INVOLVES TAKING WATER SYSTEM COMPONENTS OUT OF OPERATION. For each day there are emergency or abnormal operating conditions at the plant or in the distribution system served by the plant, describe the emergency or abnormal operating conditions (attach additional sheets as necessary). In addition, for each day plant or distribution components other than water service lines are taken out of operation for repair or maintenance, describe the repair or maintenance (attach additional sheets as necessary).

Table 1: T₁₀/T Factors for Various Baffling Conditions

Baffling Condition	T ₁₀ /T	Baffling Description
Unbaffled (mixed flow)	0.1	No baffling, agitated basin, very low length-to-width ratio, high inlet and outlet velocities
Poor	0.3	Single or multiple unbaffled inlets and outlets, no intrabasin baffles
Average	0.5	Baffled inlet or outlet with some intrabasin baffles
Superior	0.7	Perforated inlet baffle, serpentine or perforated intrabasin baffles, outlet weir or perforated launders
Perfect (plug flow)	1.0	Very high length-to-width ratio (pipeline flow); perforated inlet, outlet, and intrabasin baffles

Table 2: CT Values for Inactivation of Viruses by Free Chlorine, pH 6-9

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	3.0	2.8	2.6	2.4	2.2	2.0	1.8	1.6	1.4	1.2	1.0	1.0	1.0	1.0	1.0	1.0
3	4.0	3.8	3.6	3.4	3.2	3.0	2.8	2.6	2.4	2.2	2.0	1.8	1.6	1.4	1.2	1.0
4	6.0	5.6	5.2	4.8	4.4	4.0	3.8	3.6	3.4	3.2	3.0	2.8	2.6	2.4	2.2	2.0

Table 3: CT Values for Inactivation of Viruses by Free Chlorine, pH 10

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	22.0	20.6	19.2	17.8	16.4	15.0	14.2	13.4	12.6	11.8	11.0	10.2	9.4	8.6	7.8	7.0
3	33.0	30.8	28.6	26.4	24.2	22.0	20.8	19.6	18.4	17.2	16.0	15.0	14.0	13.0	12.0	11.0
4	45.0	42.0	39.0	36.0	33.0	30.0	28.4	26.8	25.2	23.6	22.0	20.6	19.2	17.8	16.4	15.0

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

Table 4: CT Values for Inactivation of Viruses by Chlorine Dioxide

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	4.2	3.9	3.6	3.4	3.1	2.8	2.7	2.5	2.4	2.2	2.1	2.0	1.8	1.7	1.5	1.4
3	12.8	12.0	11.1	10.3	9.4	8.6	8.2	7.7	7.3	6.8	6.4	6.0	5.6	5.1	4.7	4.3
4	25.1	23.4	21.7	20.1	18.4	16.7	15.9	15.0	14.2	13.3	12.5	11.7	10.9	10.0	9.2	8.4

Table 5: CT Values for Inactivation of Viruses by Chloramines if Chlorine Is Added Prior to Ammonia

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	643	600	557	514	471	428	407	385	364	342	321	300	278	257	235	214
3	1,067	996	925	854	783	712	676	641	605	570	534	498	463	427	392	356
4	1,491	1,392	1,292	1,193	1,093	994	944	895	845	796	746	696	646	597	547	497

Table 6: CT Values for Inactivation of Viruses by Ozone

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	0.50	0.46	0.42	0.38	0.34	0.30	0.29	0.28	0.27	0.26	0.25	0.23	0.21	0.19	0.17	0.15
3	0.80	0.74	0.68	0.62	0.56	0.50	0.48	0.46	0.44	0.42	0.40	0.37	0.34	0.31	0.28	0.25
4	1.00	0.92	0.84	0.76	0.68	0.60	0.58	0.56	0.54	0.52	0.50	0.46	0.42	0.38	0.34	0.30

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

PWS Identification Number:	Plant Name:
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IV. Summary of Use of Polymer Containing Acrylamide, Polymer Containing Epichlorohydrin, and Iron or Manganese Sequestrant for the Year: *

A. Is any polymer containing the monomer acrylamide used at the water treatment plant? No Yes, and the polymer dose and the acrylamide level in the polymer are as follows:

Polymer Dose, ppm =	Acrylamide Level, % [†] =
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B. Is any polymer containing the monomer epichlorohydrin used at the water treatment plant? No Yes, and the polymer dose and the epichlorohydrin level in the polymer are as follows:

Polymer Dose, ppm =	Epichlorohydrin Level, % [†] =
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C. Is any iron or manganese sequestrant used at the water treatment plant? No Yes, and the type of sequestrant, sequestrant dose, etc., are as follows:

Type of Sequestrant (polyphosphate or sodium silicate):

Sequestrant Dose, mg/L of phosphate as PO ₄ or mg/L of silicate as SiO ₂ =
--

If sodium silicate is used, the amount of added plus naturally occurring silicate, in mg/L as SiO ₂ =
--

* Complete and submit Part IV of this report only with the monthly operation report for December of each year and only for water treatment plants using polymer containing acrylamide, polymer containing epichlorohydrin, and/or an iron and manganese sequestrant.

[†] Acrylamide and epichlorohydrin levels may be based on the polymer manufacturer's certification or on third-party certification.

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

INSTRUCTIONS: This report shall be completed and submitted by all public water systems, except transient non-community water systems using only ground water and serving only businesses other than public food service establishments, that treat raw ground water or purchased finished water. WITHIN TEN DAYS AFTER THE END OF EACH MONTH, complete this report and submit it to the appropriate Department of Environmental Protection District Office or Approved County Health Department. All information provided in this report shall be typed or printed in ink. Complete and submit Parts I through III of this report every month; complete and submit Part IV of this report only with the monthly operation report for December of each year and only if using polymer containing acrylamide, polymer containing epichlorohydrin, and/or an iron and manganese sequestrant. NOTE THAT A SEPARATE MONTHLY OPERATION REPORT IS REQUIRED FOR EACH PLANT TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER.

The following specific instructions are for Part II of this report.

Process performance records shall be kept for the following treatment processes: coagulation/flocculation, sedimentation, filtration, lime-soda ash softening, ion exchange softening, nanofiltration and reverse osmosis, and electrodialysis. Coagulation/flocculation records should include source water temperature, pH, turbidity, color, and alkalinity and process effluent pH and alkalinity in addition to chemical feed rates. Sedimentation records should include process effluent turbidity and sludge volume produced. Filtration records should include process effluent turbidity and color, number of filters in service, filtration rates, unit filter run volumes, head losses, length of filter runs, frequency of backwash, amount of backwash water used, duration of backwash, and backwash rates. Lime-soda ash softening records should include source water and process effluent hardness in addition to records for coagulation/flocculation, sedimentation, and filtration. Ion exchange softening records should include feed and bypass flows, blend rate, and salt and brine used. Nanofiltration and reverse osmosis records should include feed, product, and brine flows; feed pressure, temperature, pH, conductivity, and turbidity; product pH and conductivity; and brine pH and conductivity. Electrodialysis records should include polarity, feed temperature and total dissolved solids, product conductivity and total dissolved solids, dilute flow rate, brine make-up, pressures, and volts/amps.

The following specific instructions are for the table in Part III of this report.

HOURS PLANT IN OPERATION. For each day the plant is in operation, enter the number of hours that the plant is in operation.

NET QUANTITY OF FINISHED WATER PRODUCED. Enter the net quantity of finished water, excluding any filter backwash water, produced by the plant for each day the plant is in operation; compute and enter the total net quantity of finished water produced for the month; compute and enter the average daily net quantity of finished water produced for the month; and enter the maximum day net quantity of finished water produced for the month. If the plant is staffed during every hour it is in operation or if the plant has flow recording equipment, enter the net quantity of finished water produced between 12:00 midnight and 12:00 midnight for each day the plant is in operation. If the plant is not staffed during some hours it is in operation and if the plant does not have flow recording equipment, read the totalizing flow meter(s) (or the elapsed time clock[s]) at approximately the same time each day the plant is staffed or visited by a licensed operator and enter the net quantity of finished water produced during the one or more calendar days since the meter(s) (or the elapsed time clock[s]) was(were) last read. For each entry that represents the net quantity of finished water produced during two or more calendar days, place a "}" next to the calendar days covered by the entry and assume the entry is divided evenly between those calendar days for the purpose of determining the maximum day net quantity of finished water produced for the month.

CT CALCULATIONS, OR UV DOSE, TO DEMONSTRATE FOUR-LOG VIRUS INACTIVATION, IF APPLICABLE. Provide this information if the plant is treating raw ground water from wells considered microbially contaminated or susceptible to microbial contamination per paragraph 62-555.315(6)(b) or (f), F.A.C, and beginning no later than January 1, 2006, provide this information if the plant is treating water in a manner that exposes the water during treatment to the open atmosphere and possible microbial contamination. (Aerators and other facilities that are protected from contamination by birds, insects, wind-borne debris, rainfall, and water drainage are not considered to be exposing water to the open atmosphere and possible microbial contamination.)

For each day water is served to the public from a plant that includes chemical disinfection for virus inactivation, enter the lowest residual disinfectant concentration (C) measured before or at the first customer during peak flow, the corresponding disinfectant contact time (T) at the C measurement point during peak flow, and the resulting lowest CT provided before or at the first customer during peak flow. (Disinfectant contact time in pipelines flowing full shall be calculated by dividing the internal volume of the pipeline by the flow rate through the pipeline, and disinfectant contact time in tanks, etc., shall be the time it takes for ten percent of the water to pass through the tank, etc., and shall be determined by tracer studies or by multiplying the theoretical detention time by an appropriate T_{10}/T factor based upon baffling conditions in the tank, etc. Table 1 at the end of these instructions lists appropriate T_{10}/T factors for various baffling conditions.) In addition, for each day water is served to the public from the plant, enter the temperature of the water at the point where C is measured; enter the pH of the water at the point where C is measured if free chlorine is being used for virus inactivation; and with this temperature

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

and pH information, determine and enter the minimum CT required. (Required minimum CT values are listed in Appendix E of the *Guidance Manual for Compliance with the Filtration and Disinfection Requirements for Public Water Systems Using Surface Water Sources*. Tables 2 through 6 at the end of these instructions present the values from Appendix E.)

For each day water is served to the public from a plant that includes ultraviolet (UV) disinfection for virus inactivation, enter the lowest operational UV dose measured and the minimum UV dose required.

LOWEST RESIDUAL DISINFECTANT CONCENTRATION AT REMOTE POINT IN DISTRIBUTION SYSTEM. For each day a water system serving 3,300 or more persons serves water to the public or five days per week, whichever is less, enter the residual disinfectant concentration measured at a point in the distribution system reflecting maximum residence time after disinfectant addition. For each day a water system serving less than 3,300 persons serves water to the public or two days per week, whichever is less, enter the residual disinfectant concentration measured at a point in the distribution system reflecting maximum residence time after disinfectant addition.

EMERGENCY OR ABNORMAL OPERATING CONDITIONS; REPAIR OR MAINTENANCE WORK THAT INVOLVES TAKING WATER SYSTEM COMPONENTS OUT OF OPERATION. For each day there are emergency or abnormal operating conditions at the plant or in the distribution system served by the plant, describe the emergency or abnormal operating conditions (attach additional sheets as necessary). In addition, for each day plant or distribution components other than water service lines are taken out of operation for repair or maintenance, describe the repair or maintenance (attach additional sheets as necessary).

Table 1: T₁₀/T Factors for Various Baffling Conditions

Baffling Condition	T ₁₀ /T	Baffling Description
Unbaffled (mixed flow)	0.1	No baffling, agitated basin, very low length-to-width ratio, high inlet and outlet velocities
Poor	0.3	Single or multiple unbaffled inlets and outlets, no intrabasin baffles
Average	0.5	Baffled inlet or outlet with some intrabasin baffles
Superior	0.7	Perforated inlet baffle, serpentine or perforated intrabasin baffles, outlet weir or perforated launders
Perfect (plug flow)	1.0	Very high length-to-width ratio (pipeline flow); perforated inlet, outlet, and intrabasin baffles

Table 2: CT Values for Inactivation of Viruses by Free Chlorine, pH 6-9

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	3.0	2.8	2.6	2.4	2.2	2.0	1.8	1.6	1.4	1.2	1.0	1.0	1.0	1.0	1.0	1.0
3	4.0	3.8	3.6	3.4	3.2	3.0	2.8	2.6	2.4	2.2	2.0	1.8	1.6	1.4	1.2	1.0
4	6.0	5.6	5.2	4.8	4.4	4.0	3.8	3.6	3.4	3.2	3.0	2.8	2.6	2.4	2.2	2.0

Table 3: CT Values for Inactivation of Viruses by Free Chlorine, pH 10

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	22.0	20.6	19.2	17.8	16.4	15.0	14.2	13.4	12.6	11.8	11.0	10.2	9.4	8.6	7.8	7.0
3	33.0	30.8	28.6	26.4	24.2	22.0	20.8	19.6	18.4	17.2	16.0	15.0	14.0	13.0	12.0	11.0
4	45.0	42.0	39.0	36.0	33.0	30.0	28.4	26.8	25.2	23.6	22.0	20.6	19.2	17.8	16.4	15.0

MONTHLY OPERATION REPORT FOR PWSs TREATING RAW GROUND WATER OR PURCHASED FINISHED WATER

Table 4: CT Values for Inactivation of Viruses by Chlorine Dioxide

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	4.2	3.9	3.6	3.4	3.1	2.8	2.7	2.5	2.4	2.2	2.1	2.0	1.8	1.7	1.5	1.4
3	12.8	12.0	11.1	10.3	9.4	8.6	8.2	7.7	7.3	6.8	6.4	6.0	5.6	5.1	4.7	4.3
4	25.1	23.4	21.7	20.1	18.4	16.7	15.9	15.0	14.2	13.3	12.5	11.7	10.9	10.0	9.2	8.4

Table 5: CT Values for Inactivation of Viruses by Chloramines if Chlorine Is Added Prior to Ammonia

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	643	600	557	514	471	428	407	385	364	342	321	300	278	257	235	214
3	1,067	996	925	854	783	712	676	641	605	570	534	498	463	427	392	356
4	1,491	1,392	1,292	1,193	1,093	994	944	895	845	796	746	696	646	597	547	497

Table 6: CT Values for Inactivation of Viruses by Ozone

Inactivation (Log)	Water Temperature (°C)															
	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
2	0.50	0.46	0.42	0.38	0.34	0.30	0.29	0.28	0.27	0.26	0.25	0.23	0.21	0.19	0.17	0.15
3	0.80	0.74	0.68	0.62	0.56	0.50	0.48	0.46	0.44	0.42	0.40	0.37	0.34	0.31	0.28	0.25
4	1.00	0.92	0.84	0.76	0.68	0.60	0.58	0.56	0.54	0.52	0.50	0.46	0.42	0.38	0.34	0.30



FLORIDA DEPARTMENT OF Environmental Protection

Central District Office
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

February 8, 2022

Charles Demenzes, Manager
Tradewinds Utilities, Inc.
1552 SW 7th Rd
OCALA, FL 34471
charlie@altfo.com

Re: Compliance Assistance Offer
Tradewinds Village
PW Facility ID #3424690
Marion County

Dear Mr. Demenzes:

A file review was conducted on your facility on February 7, 2022. During this file review, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

Specifically, Department records indicate your facility did not perform required testing for *lead and copper* sampling/testing, which were required to be *performed triennially* per rule 62-550, Florida Administrative Code (F.A.C) or according to your permit. The report was due by October 10, 2021 and was submitted late. The report was received by the Department on February 2, 2022.

We request you review the item of concern noted and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed.
 - Provide documentation on steps that have been taken to prevent future sampling omissions.
 - The system has incurred a monitoring and reporting violation. For community water systems, this violation must be included on the CCR issued in 2022.
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid.

It is the Department's desire that you are able adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

Tradewinds Village; Facility ID No.: 3424620
Compliance Assistance Offer
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Please address your response and any questions to Miranda Rothenberger of the Central District Office at 407-897-4301 or via e-mail at Miranda.Rothenberger@FloridaDEP.gov. We look forward to your cooperation with this matter.

Sincerely,

A handwritten signature in black ink that reads "Daniel K. Hall". The signature is written in a cursive style with a large initial "D".

Daniel Hall, Environmental Manager
Central District
Florida Department of Environmental Protection

cc: Miranda Rothenberger, FDEP
Reuben Law, randkenvironmental@outlook.com

ATTACHMENT D
Local Vendor Recommendations

- a. Recommendations for local vendors
 - i. O&M Companies
 - US Water Service
 - Utility Technicians
 - ii. Labs or Testing Companies
 - Aqua Pure (352)-355-2383
 - iii. General Contractors
 - Oxford Pipeline
 - iv. Well Drillers
 - Unknown
 - v. Electricians
 - Interstate Electric

ATTACHMENT E

Site Photographs

