BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
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IN RE: Application for Certificates to provide Water and Wastewater Service in Clay County by Point Water and Sewer, Inc.	)	DOCKET NO. 961321-WS Date Submitted for Filing: May 23, 1997

PREHEARING REBUTTAL TESTIMONY OF CANDIS WHITNEY ON BEHALF OF POINT WATER AND SEWER, INC.

Q. Please state your name and address for the record.

A. My names is Candis Whitney. My business address is located at Whitney's Marina, 3027 Highway 17, Orange Park, Florida 32073.

Q. What is your occupation?

A. I own and operate Whitney's Marine which is located at Doctor's Inlet and adjoins the Point Townhomes.

Q. Are you familiar with Point Water & Sewer, Inc. ("PWS") and the Point Property Owner's Association ("PPOA")?

A. Yes. PWS is a utility company which provides water and wastewater service to my marina, as well as to the PPOA.

Q. Have you been satisfied with Point Water & Sewer's service?

A. Yes.

Q. Have you had any problems with your service?

A. Not during the past couple of years.

Q. Has PWS on any occasion posed any health threat to your marina or its boaters?

A. No.

Q. Please discuss the utilities' relationship with you.

A. I have had a good working relationship with John Yonge, the President of Point Water & Sewer, who I have known for many years. John has responded to my inquiries and requests and has been prompt in addressing them.

Q. Do you have any reason to believe that PWS poses any harm to the environment?

A. Discharge into the River carries some potential for problems, but during the past two years, Whitney's Marina applied to expand our dockage. In order to acquire a permit for the expanded package, which has now been granted by the Florida Department of Environmental Protection, we had to conduct environmental testing. Attached hereto as Exhibit CW-1 is a report prepared by the Environmental Services. The Report concluded: "No water quality concerns were identified during this investigation." PWS' effluent line is contained within our dock structure and discharges at the end of one of our docks.

Q. Do you have any objection to the Public Service Commission awarding PWS an original Certificate of Authorization?

A. I have not objected to PWS' application but, ultimately, I believe it would be preferable and more efficient to tie-in to the county system.

Q. Does this complete your testimony?

A. Yes, but I will answer any other questions.

WHITNEY'S MARINE
CLAY COUNTY, FLORIDA
SURFACE WATER QUALITY RESULTS
OF 10/16/96 SAMPLING EVENT

FDEP File No. 102873469
ESI Project No. EJ96058

28 October 1996

FOR

Whitney's Marine
Attn: Mrs. Candis Whitney
3027 Highway 17 South
Orange Park, Florida 32073

AND

Florida Department of Environmental Protection
Northeast District Office
Attn: Mr. Steve Sabia
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590

BY

Environmental Services, Inc.
8711 Perimeter Park Boulevard, Suite 11
Jacksonville, Florida 32216

EXHIBIT CW-1

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III. METHODOLOGY

A. Quality Assurance/Quality Control

Water samples were collected and *in situ* measurements were conducted according to ESI's Comprehensive Quality Assurance Plan (CompQAP) #910112G, approved for renewal by FDEP on 2 May 1996. Specific Quality Control measures to ensure accuracy, precision, completeness, representativeness and replicability are discussed below.

B. Sampling Station Locations

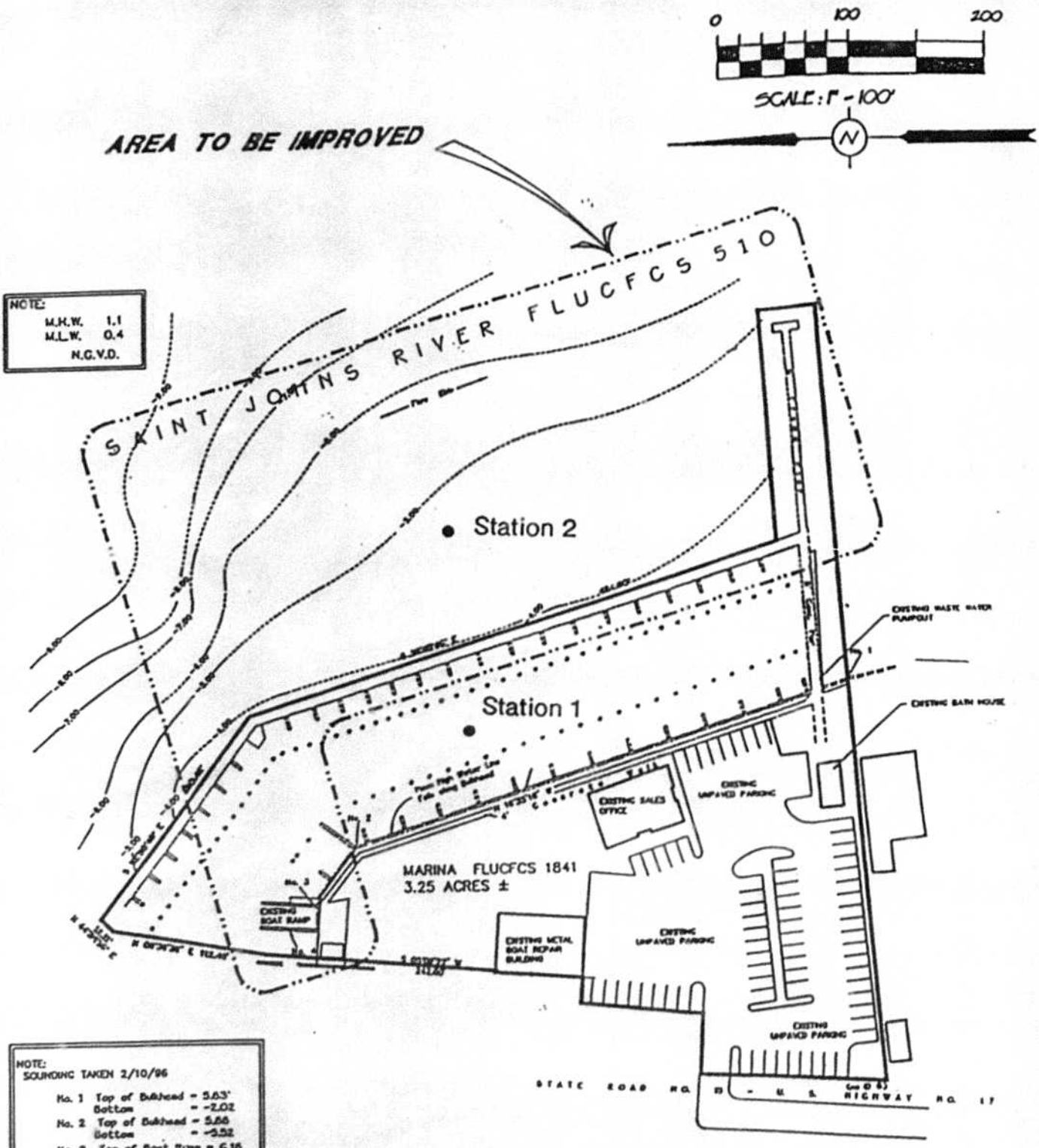
Two (2) stations, illustrated on the site map (Figure 1), were approved by FDEP and sampled by ESI during this investigation. Station 1 was located inside the existing boat slips, and Station 2 was located in the St. Johns River within the proposed marina expansion area.

C. Sampling Event of 16 October 1996

The sampling event was conducted on 16 October 1996 by ESI personnel, Mr. Jeffrey K. Jones. Mrs. Candis Whitney supervised the collection of samples and field measurements. Both stations were sampled from a boat. All field observations and measurements were recorded with indelible ink into a bound field notebook, and are presented in Table 1. No visible turbidity plumes, oily sheens, or other unusual conditions were observed in the water at either of the stations.

D. Field Water Quality Measurements

The following parameters were measured *in situ* at each station using a HydroLab Surveyor II: temperature (°C), pH (standard units), dissolved oxygen (mg/l), specific conductance (µmhos/cm) and salinity (g/l). Turbidity (NTU) was also measured in the field using a Hach Model 16-800 Nephelometric Turbidimeter. Both instruments were calibrated in the ESI laboratory on the morning of 16 October 1996, prior to the sampling event. Calibration notes were recorded in the field notebook (Appendix A). Immediately following the sampling event, the instrument calibrations were checked at Whitney's Marine using calibration standards to verify accuracy. Post-sampling calibration checks for pH, dissolved oxygen, specific conductance and turbidity all measured within an acceptable error margin of one (1.0) percent. Post-sampling measurements were recorded in the field notebook (Appendix A).



Whitney's Marine

ESI Project No. EJ96058

Figure 1

E. Sample Collection, Preservation and Handling

Water samples for laboratory chemical analyses were collected from mid-depth (3.0 feet at each station) using a 2.2 liter Kemmerer sampler. Water chemistry samples were collected in 500 ml High Density Polyethylene (HDPE) containers, which were provided (pre-acidified with HNO_3) by the subcontract laboratory. Three (3) replicate water samples were collected at each station, and an Equipment Rinse sample was prepared using distilled water, resulting in seven (7) total samples for laboratory analysis.

All sample containers were labeled on site with station name, sample identification number, and date and time of collection. Immediately following collection, all sample containers were sealed and placed on ice. Chain-of-custody records for the water samples were initiated at the time of collection and kept with the sealed sample cooler, which was delivered by Mr. Jones to the subcontract laboratory. The maximum holding time was at least 28 days for each of the parameters of interest.

F. Laboratory Analyses

Water samples were analyzed using EPA-approved methods at Environmental Conservation (ENCO) Laboratories in Jacksonville, Florida, a state certified laboratory (CompQAP #960038G, approved for renewal by FDEP on 20 February 1996). Specific analytical techniques and method detection limits for each water quality parameter are listed below (Table 1), along with the Florida Class III Freshwater Surface Water Quality Criteria, as defined in Rule 62-302.530 F.A.C.

Table 1. Laboratory analytical methods, method detection limits (MDLs), and Florida water quality standards for parameters of interest.

Parameter	EPA Method	MDL	Surface Water Quality Criterion[a]	Units
Total Arsenic	EPA 200.7	7	≤ 50	µg/l (or ppb)
Total Chromium	EPA 200.7	3	≤ 207[b]	µg/l (or ppb)
Copper	EPA 220.2	1	≤ 11.8[b]	µg/l (or ppb)
Total Hardness	EPA 130.1	N/A[c]	N/A	mg/l (or ppm)

[a] Pursuant to Rule 62-302.530 F.A.C. (Class III Freshwater Surface Waters)
[b] Criteria for chromium and copper are based on water hardness of 100 mg/l.
[c] N/A = Not Applicable

IV. RESULTS

A. Field Water Quality Parameters

Field observations and results of the *in situ* water quality measurements for Stations 1 and 2 are provided below (Table 2).

Table 2. Field observations, *in situ* measurements and sample collection data from vicinity Whitney's Marine during the sampling event of 16 October 1996.

Parameter	Station 1	Station 2
Antecedent Weather Conditions:		
Wind Velocity & Direction	10 MPH Southeast	10 MPH Southeast
Air Temperature	24°C	24°C
Cloud Cover	< 20 percent	< 20 percent
Precipitation	None	None
Water Conditions:		
Tidal Stage	Flood, 2 hours after low	Flood, 2½ hours after low
Flow Direction	None	Slow, to North
Water Surface	1-3 inch ripples	6-10 inch ripples
Total Water Depth	7.0 feet	7.0 feet
In situ Measurements:		
Time	12:20	12:45
Sampling Depth	3.0 feet	3.0 feet
Water Temperature	22.9°C	22.8°C
pH	6.91	6.91
Dissolved Oxygen	6.9 mg/l	6.8 mg/l
Specific Conductance	880 µmhos/cm	800 µmhos/cm
Salinity	0.0 g/l	0.0 g/l
Turbidity	3.2 NTU	3.6 NTU
Laboratory Sample Collection:		
Time (Replicates A, B and C)	12:30, 12:33, 12:35	12:50, 12:53, 12:55
Sampling Depth	3.0 feet	3.0 feet

B. Laboratory Analyses

Water chemistry results from the sampling event of 16 October 1996 are summarized below (Table 3). The complete laboratory report from ENCO Laboratories is attached (Appendix B). Comparison of these results to Class III Freshwater Surface Water criteria indicated that all parameters were within compliance of state standards.

Table 3. Laboratory analytical results of water samples collected at Whitney's Marine during the sampling event of 16 October 1996.

Parameter	Surface Water Criterion[a]	Units	Station 1			Station 2			Equipment Rinse
			Rep 1	Rep 2	Rep 3	Rep 1	Rep 2	Rep 3	
Total Arsenic	≤ 50	µg/l	ND[b]	ND	ND	ND	ND	ND	---[c]
Total Chromium	≤ 207[d]	µg/l	ND	ND	ND	ND	ND	ND	---
Copper	≤ 11.8[d]	µg/l	2	4	ND	ND	ND	1	ND
Total Hardness	N/A[e]	mg/l	---	200	---	---	100	---	---

[a] Pursuant to Rule 62-302.530 F.A.C. (Class III Freshwater Surface Waters)
[b] ND = Not Detected at MDL listed above (Table 1)
[c] --- = Not Analyzed
[d] Criteria for chromium and copper are based on water hardness of 100 mg/l.
[e] N/A = Not Applicable

V. CONCLUSIONS

The results of this sampling event, conducted on 16 October 1996, revealed that all physical and chemical water quality parameters analyzed were within compliance of Florida's Water Quality Criteria for Class III Freshwater Surface Waters, as defined in Rules 62-302.500, 62-302.510 and 62-302.530 F.A.C. No water quality concerns were identified during this investigation.

VI. SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

Gary K. Howalt
Senior Project Manager

Jeffrey K. Jones
Senior Scientist

VII. REFERENCES

American Public Health Association (APHA), AWWA and WPCF, 1989, Standard Methods for the Examination of Water and Wastewater, (17th Edition, Part 10500), APHA, New York.

Florida Administrative Code (F.A.C.), 1996, Chapter 62-302, Surface Water Quality Standards, Section 530 "Table: Surface Water Quality Criteria."

Florida Department of Environmental Protection, 1992, Standard Operating Procedures for Laboratory Operations and Sample Collection Activities (DEP - QA-001/92), Florida DEP, Quality Assurance Section, Tallahassee, Florida.