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**SUNDSTROM
& MINDLIN, LLP**

Attorneys | Counselors



November 9, 2016

Carlotta Stauffer, Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Oak Springs, LLC: Docket No. 160075-WU
Joint Application for Authority to Transfer Assets and Certificate No. 623-W
In Orange and Lake Counties to Oak Springs MHC, LLC

Dear Ms. Stauffer,

I am hereby filing on behalf of the above-referenced applicants, the responses to staff's deficiency letter dated July 20, 2016. Please excuse the delay in putting this information together.

1. **Proof of Noticing.** Rule 25-30.030(6), Florida Administrative Code (F.A.C.), requires that an affidavit of noticing along with a copy of the notice are to be provided to the Office of Commission Clerk. A copy of the notice mailed to the customers of the utility was not attached to the affidavit. Please provide a copy of the notice mailed to the customers.

Utility response:

Attached is a copy of the notice mailed to the customers of the utility that should have been included with the Affidavit submitted on April 11, 2016.

2. **Buyer Information.** Rule 25-30.037(2)(d), F.A.C., requires that the applicant provide specified information relating to the buyer, including the Federal Employer Identification Number (FEIN), and if available, its email address and fax number. The applicant did not provide the FEIN, email address or fax number. Please provide the FEIN. Please also provide the buyer's email address and fax number, or state that the requested information is unavailable if applicable.

Utility response:

The Federal Employee Identification Number (FEIN) for Oak Springs MHC, LLC for 47-2987768. The appropriate email for matters related to the utility is

mvirga@summit-communities.com and a fax number for the utility is 248-886-9470.

- Books and Records.** Rule 25-30.037(2)(e), F.A.C., requires that the applicant provide specified information relating to the person in possession of the books and records, including the email address and fax number, if available. Please provide the email address and fax number of the person in possession of the books and records, or a statement that the information is unavailable.

Utility response: The books and records as indicated in the original filing are held by Maria E. Virga, Managing Member and Operating Officer, and therefore her email and fax number as listed in response to No. 2 above are the appropriate ones in response to this question.

- Florida Department of State, Division of Corporations Documentation.** Rule 25-30.037(2)(f)1. and 2, F.A.C., requires that the applicant provide the nature of the buyer's business organization, and documentation from the Florida Department of State, Division of Corporations, showing: (1) The utility's business name and registration/document number for the business, unless operating as a sole proprietor; and, (2) The utility's fictitious name and registration number for the fictitious name, if operating under a fictitious name. Please provide the required documentation from the Florida Department of State, Division of Corporations.

Utility response:

Attached hereto are the Florida Department of State documents relative to the buying entity.

- Contract for Sale.** Rule 25-30.037(2)(i), F.A.C., requires that the sale contract executed prior to Commission approval contain a provision stating that the contract is contingent upon Commission approval. Please provide a contract amendment that contains this provision.

Utility response:

We have prepared a "First Addendum to Mobile Home Park Purchase and Sale Agreement" that provides that it was the intent of the parties that the sale was contingent on Commission approval, and agreeing to "unwind" the sale of the utility if such approval is not received. I hope to have it fully executed in the next few days and will forward it to you immediately thereafter.

6. **Assets and Liabilities.** Rule 25-30.037(2)(j)(3), F.A.C., requires a list of and the dollar amount of the assets and liabilities assumed or not assumed, including those of non-regulated operations or entities. Although the applicant provided that no liabilities were assumed in regards to the utility, please provide a list of and the dollar amount of the specific utility assets. Please also provide a list of and the dollar amount of the assets and liabilities of non-regulated operations or entities, or indicate there are no non-regulated assets.

Utility response:

The utility provided as part of its original Application, as Exhibit A, the contract for sale which lists the assets being acquired in the transaction by Oak Springs MHC, LLC from Oak Springs, LLC. The contract notes that all of the assets of the mobile home park were purchased for \$11 million, including the assets of the utility. The Application further noted that \$110,000 of that total had been allocated to the utility. The breakdown of the utility assets by NARUC account was provided to the Commission by letter dated July 5, 2016 in substantial detail as of the date of transfer. These schedules are again attached for your convenience.

7. **Consideration between Parties.** Rule 25-30.037(2)(j)(4), F.A.C., requires a description of all consideration between the parties, including promised salaries, retainer fees, stock, stock options, and assumption of obligations. Please provide a description of any consideration specific to the utility.

Utility response:

As noted above, the purchase price for all of the assets of the Oak Springs Mobile Home Park, including the utility assets, was \$11 million as noted on page 1 of Exhibit A to the Application as filed by the utility. The utility assets were assigned a value of \$110,000 from that purchase price which is approximately equal to the net book value of the utility as outlined in detail in our July 5, 2016 letter.

8. **Records and Reports.** Rule 25.30.037(2)(j)(9), F.A.C., requires a statement that the utility's books and records will be maintained at the utility's office(s) within Florida, or that the utility will comply with the requirements of paragraphs 25.30.110(1)(b) and (c), F.A.C., regarding maintenance of utility records at another location or out-of-state. Although the applicant provided a statement that the utility's books and records will be maintained at the utility's office, an address was not listed. Please provide a statement that the utility's books and records will be maintained at the utility's offices with an address included.

Utility response:

The utility will maintain the utility books and records at its Florida office located at 12 Highland Street, Sorrento, Florida 32776.

9. **Detailed Financial Statement.** Rule 25-30.037(2)(l)1, F.A.C., requires a detailed financial statement (balance sheet and income statement), audited if available, of the financial condition of the applicant, that shows all assets and liabilities of every kind and character. Although the applicant provided a balance sheet of its parent company, also referred to as the Buyer, please provide an income statement as well.

Utility response:

The buyer of the utility was ultimately Oak Springs MHC, LLC rather than its parent Company PFC Park Holdings, LLC. This assignment was authorized by Section 21 of the "Mobile Home Park Purchase and Sale Agreement". The Provisions of Rule 25-30.037(2)(l)1 relate to the financial statements of the Buyer of the utility. In this case that is Oak Springs MHC, LLC. . Since the Buyer of the utility did not exist until just prior to the Purchase of the Oak Springs Mobile Home Park, including the utility, that entity has no balance sheet or income statement prior to the closing. In Oder to comply with the requirements of the referenced rule, our application should have said 'No such financial statements exist since the buyer is a new entity'.

The balance Sheet of the parent company PFC Park Holdings, LLC was provided in order to show that the utility entity had the financial backing of its parent company with substantial assets, rather than to comply with the referenced rule that applies to the buyers financial statements.

10. **Seller's Federal Income Tax Returns.** Rule 25.30.037(2)(p), F.A.C., requires a statement from the buyer that it has obtained or will obtain copies of all of the federal income tax returns of the seller from the date the utility was first established or the rate base was last established by the Commission, whichever is later. Although the applicant provided that the Buyer has obtained the federal tax returns from 2012 to 2014, please provide a statement that the buyer has or will obtain copies of all of the federal income tax returns from the date the utility was first established or the rate base was last established by the Commission, whichever is later.

Utility response:

The utility has obtained copies of the tax returns for the years 2012, 2013 and 2014. They show that the assets from the mobile home park have been and are being depreciated. The purpose of the rule 25-30.037(2)(p) is for the utility to provide information about assets being depreciated rather than having been written off to cost of sales in developments were the related party developer is selling lots. Since this community is now and has since its inception always been a rental mobile home park with no individuals other than the related development company owning the land, there is no purpose to be served by obtaining additional tax returns. In any case the utility after repeated requests from the seller is not able to obtain these records because the seller no longer maintains those earlier tax returns.

11. **Department of Environmental Protection (DEP) Documents.** Rule 25-30.037(2)(r)2, F.A.C., requires that the applicant provide a copy of the most recent DEP sanitary survey and secondary standards drinking water report. Please provide these reports.

Utility response:

Attached are those most recent drinking water reports.

12. **Access to Land for Treatment Facilities.** Rule 25-30.037(2)(s), F.A.C., requires the buyer provide a copy of a recorded warranty deed, recorded quit claim deed accompanied by title insurance, recorded lease such as a 99-year lease or a recorded easement needs to be provided in order to document the its right to access and use the land upon which the utility treatment facilities are located. Please provide a copy of the appropriate document.

Utility response:

This information was provided to the auditor. The legal description provided and which was utilized in the transfer of assets as part of the contract for sale provided as Exhibit A to the original Application is the same legal description contained within the Deed in the utility's original Certificate Application approved by the Commission in Docket No. 040415-WU. It includes all of the land for the mobile home park. The utility is being held in an entity that owns both the utility assets

Ms. Carlotta Stauffer
November 9, 2016
Page 6

and the mobile home park assets. The utility will be operated as a division of that entity.

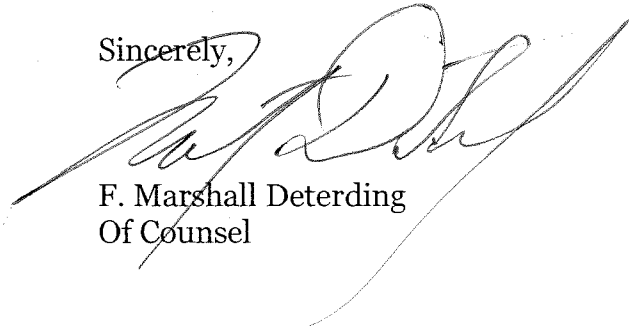
13. **Annual Report.** Rule 25.30.037(2)(t), F.A.C., requires a statement regarding which entity will be responsible for filing the annual report for the year of the transfer and subsequent years. Please provide a statement regarding which entity will be responsible for filing the annual report for 2015 and subsequent years.

Utility response:

A partial annual report up through the date of closing in 2015 was filed with the Commission by the seller. A full year's annual report for 2015 was filed with the Commission by the buyer. As noted in the Application, the buyer will be responsible for all annual reports after the date of closing.

If you or any members of the staff have any questions with regard to any of the above comments or suggestions or any of the attachments, please do not hesitate to contact me.

Sincerely,



F. Marshall Deterding
Of Counsel

FMD/brf

cc: Kyesha Mapp, Esq.
Melinda Watts
Maria Virga

#1 Proof of Noticing

**NOTICE OF APPLICATION FOR TRANSFER UTILITY ASSETS
AND WATER CERTIFICATE**

NOTICE IS HEREBY given on the 5th day of April, 2016, pursuant to Section 367.071, Florida Statutes, of the Application for Transfer of the Utility Assets of Oak Springs, LLC, and Certificate No. 623-W to Oak Springs MHC, LLC, providing water service to the following described territory in Orange County and Lake County, Florida:

PARCEL I: ORANGE COUNTY

That part of the Northeast $\frac{1}{4}$ of Section 5, Township 20 South, Range 28 East, Orange County, Florida, more particularly described as follows:

Commence at the Northeast corner of the Northeast $\frac{1}{4}$ of Section 5, Township 20 South, Range 28 East, Orange County, Florida; thence North $89^{\circ}42'51''$ West, along the North boundary of said Northeast $\frac{1}{4}$, a distance of 204.22 feet to the Point of Beginning; thence South $0^{\circ}17'09''$ West, 350.00 feet; thence North $89^{\circ}42'51''$ West, 350.00 feet from and parallel with said North boundary, a distance of 1082.18 feet to a point on the West boundary of Lot 2, and the East boundary of Lot 3, J.B. Babcock's Subdivision, as recorded in Plat Book "B", Page 27, Public Records of Orange County, Florida; thence North $6^{\circ}33'51''$ West, along said boundary, a distance of 135.97 feet; thence North $89^{\circ}42'51''$ West, 215.00 feet from and parallel with said North boundary a distance of 713.38 feet to a point on the East right of way line of State Road No. 435; thence North $0^{\circ}51'24''$ East, along said right of way line, 33.00 feet from and parallel with the centerline of said road, a distance of 215.01 feet to a point on the North boundary of said Northeast $\frac{1}{4}$; thence South $89^{\circ}42'51''$ East, along said North boundary, 1809.63 feet to the point of Beginning. All being in the Northeast $\frac{1}{4}$ of Section 5, Township 20 South, Range 28 East, Orange County, Florida.

PARCEL II: LAKE COUNTY

That part of the Southeast $\frac{1}{4}$ of Section 32, Township 19 South, Range 28 East, Lake County, Florida, more particularly described as follows:

Begin at the Southeast corner of the Southeast $\frac{1}{4}$ of Section 32, Township 19 South, Range 28 East, Lake County, Florida; thence North $89^{\circ}42'51''$ West, along the South boundary of said Southeast $\frac{1}{4}$, a distance of 2013.85 feet to a point on the East right of way line of State Road No. 435; thence North $0^{\circ}51'24''$ East, along said right of way line, 33.00 feet from and parallel with the centerline of said road, a distance of 648.73 feet to the point of curvature of a curve that is concave Westerly, having a radius of 851.51 feet; thence along the arc of said right of way line curve, 33.00 feet from and parallel with said centerline, a chord bearing and distance of North $13^{\circ}36'41''$ West, 425.49 feet to the point of tangency of said curve; thence North $28^{\circ}04'47''$ West, along said right of way line, 33.00 feet from and parallel with said centerline, a distance of 213.52 feet to the point of curvature of a curve that is concave Easterly, having a radius of 268.56 feet; thence along the arc of said curve, 33.00 feet from and parallel with said centerline, a chord bearing and distance of North $19^{\circ}09'24''$ West, 83.31 feet to a point on the North boundary of the South $\frac{1}{2}$ of said Southeast $\frac{1}{4}$; thence South $89^{\circ}46'22''$ East, along said North boundary 298.70 feet to a point on the Southeasterly right of way line of Tifton Street and the Northwesterly boundary of Block 131, Mt. Plymouth, Section "A", as recorded in Plat Book 8, Pages 85 through 85-D, Public Records of Lake County, Florida; thence North $36^{\circ}11'03''$ East, along said right of way line and along said Westerly boundary, a distance of 113.68 feet to a point on a curve that is concave Northwesterly, having a radius of 1059.00 feet; thence along the arc of said curve along said right of way line, a chord bearing and distance of North $30^{\circ}03'55''$ East, 157.64 feet, to a point on the Northwesterly boundary of Block 98, said Section "A"; thence North $26^{\circ}28'40''$ East, along said right of way line and along said Northwesterly boundary, a distance of

165.71 feet to a point on a curve that is concave Southerly, having a radius of 42.70 feet; thence along the arc of said curve, along the Northerly boundary of said Block 98, a chord bearing and distance of North 72°53'40" East, 62.30 feet to a point on a curve that is concave Northerly, having a radius of 1621.00 feet; thence along the arc of said curve, along the Southerly right of way line of Selma Avenue as shown on said Section "A", and along the Northerly boundary of said Block 98 and continuation thereof, a chord bearing and distance of South 71°18'13" East, 611.36 feet to a point on the West boundary of Block 129, said Section "A"; thence North 0°20'54" West, along West boundary, and the East right of way line of St. Andrews Boulevard, as shown on said Section "A", a distance of 70.56 feet, to the most Northerly corner of said Block 129; thence South 38°15'27" East, along the Northeasterly boundary of said Block 129, and Southwesterly right of way of Selma Avenue, a distance of 355.01 feet to a point on the North boundary of said South ½; thence South 89°46'22" East, along said North boundary, 850.77 feet to the Northeast corner of said South ½; thence South 0°07'38" East, along the East boundary of said Southeast ¼, a distance of 3.43 feet to a point on the South boundary of Block 100, said Section "A"; thence North 89°42'04" West, along the South boundary of said Block 100, a distance of 265.20 feet to the Southwest corner of said Block; thence South 44°54'51" East, 376.44 feet to a point on said East boundary; thence South 0°07'38" East along said East boundary, 1061.85 feet to the Point of Beginning. All being in the Southeast ¼ of Section 32, Township 19 South, Range 28 East, Lake County, Florida.

The development served is Oak Springs Mobile Home Community. The applicant is Oak Springs MHC, LLC, 2632 Rochester Road, Suite 70630, Rochester Hills, MI 48307. Telephone 248-521-0521. The utility is not requesting any change to its rates, classifications, charges, rules and regulations in the application.

Any objections to the Application must be made in writing and filed with the Office of Commission Clerk, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, no later than 30 days from the last date this Notice was mailed or published, with a copy to F. Marshall Deterding, Esquire, Sundstrom & Mindlin, LLP, 2548 Blairstone Pines Drive, Tallahassee, Florida 32301. The objection must state the grounds for the objection with particularity.

Oak Springs, LLC and Oak Springs MHC, LLC

#4 Florida Department of State
Division of Corporations Documentation

2016 FOREIGN LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# M15000000920

Entity Name: OAK SPRINGS MHC, LLC

Current Principal Place of Business:

7749 NORMANDY BOULEVARD #145
JACKSONVILLE, FL 32221

Current Mailing Address:

7749 NORMANDY BOULEVARD #145
JACKSONVILLE, FL 32221

FEI Number: NOT APPLICABLE

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

NRAI SERVICES, INC
1200 SOUTH PINE ISLAND ROAD
PLANTATION, FL 33324 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

Authorized Person(s) Detail :

Title MGR
Name MHC MANAGEMENT SERVICES LLC
Address 7749 NORMANDY BOULEVARD #145
City-State-Zip: JACKSONVILLE FL 32221

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: MHC MANAGEMENT SERVICES LLC

MANAGER

03/15/2016

_____ Electronic Signature of Signing Authorized Person(s) Detail

_____ Date

#6 Assets and Liabilities

Oak Springs
 Docket No.
 Estimated Original Cost at December 31, 2003

Exhibit A
 Page 1 of 1
 Preparer: J. Coto/G. Morse

Line No.	NARUC Account	Description	Year Installed (2)	Age (Yrs.)	FPSC (3) Depreciation Rate (%)	Costing Method		Index Values (1)		Replacement Cost (\$)	Estimated Original Cost	Accumulated Depreciation	Original Cost Less Accum. Depreciation
						Actual Invoice (4)	Trended	Test Yr.	Yr. Installed				
1	301	Organization (Original Certificate Filing)(8)	2004	40	2.50%	Estimated					\$10,000	0	\$10,000
2	303	Land and Land Rights	1973	30.5	3.57%	Estimated (7)			\$3,750	3,750	80	\$3,750	
3	304	Structures and Improvements	1973	30.5	3.57%	Trended	313.00	100.00	0.466	1,198	1,198	0	
4	307	Wells and Springs-Well No. 1	1973	30.5	3.70%	Trended	291.00	100.00	90,000	30,928	30,928	0	
5	307	Wells and Springs-Well No. 2	1983	20.5	3.70%	Trended	291.00	208.00	80,000	57,182	43,373	13,809	
6	309	Supply Mains	1973	30.5	3.13%	Trended	333.00	100.00	12,800	3,754	3,584	170	
7	310	Power Generation Equipment	1998	5.5	5.88%	Trended	531.00	485.00	28,000	25,527	8,268	17,339	
8	311	Pumping Equipment - Well No. 1 Pump	1973	30.5	5.88%	Trended	531.00	100.00	28,000	5,273	5,273	0	
9	311	Pumping Equipment - Well No. 2 Pump	1995	8.5	5.88%	Trended	531.00	437.00	32,000	25,335	13,162	13,173	
10	311	Pumping Equipment - High Serv Pumps	1998	4.5	5.88%	Trended	531.00	489.00	11,000	10,337	2,735	7,602	
11	320	Water Treatment Equipment	1973	30.5	5.88%	Trended	385.00	100.00	74,400	18,325	18,325	0	
12	330	Distribution Reservoirs & Standpipes											
13		-Steel Tanks Hydro	1998	7.5	3.33%	Trended	270.00	251.00	26,000	24,170	8,037	18,134	
14		-Steel Tanks Storage Reservoir	1999	4.5	3.33%	Trended	270.00	289.00	36,000	37,710	5,852	32,068	
15	331	Transmission and Distribution Lines											
16		Phase 1	1973	30.5	2.50%	Trended	215.00	144.00	47,210	31,820	24,110	7,610	
17		Phase 2	1973	30.5	2.50%	Trended	215.00	144.00	28,297	18,952	14,451	4,501	
18		Phase 3	1983	20.5	2.50%	Trended	215.00	144.00	18,164	12,166	8,235	5,931	
19	333	Services											
20		Phase 1	1973	30.5	2.86%	Trended	275.00	206.00	25,100	18,802	16,401	2,401	
21		Phase 2	1973	30.5	2.86%	Trended	275.00	206.00	11,500	8,914	7,775	1,139	
22		Phase 3	1983	20.5	2.86%	Trended	275.00	206.00	5,800	5,094	2,907	2,107	
23	334	Motors and Meter Installations											
24		Phase 1	2000	3.5	5.88%	Trended	330.00	320.00	37,850	36,503	7,514	28,993	
25		Phase 2	2000	3.5	5.88%	Trended	330.00	320.00	17,850	17,309	3,552	13,747	
26		Phase 3	2000	3.5	5.88%	Trended	330.00	320.00	10,200	9,691	2,036	7,655	
27	335	Hydrants											
28		Phase 1	1973	30.5	2.50%	Trended	608.00	281.00	7,500	4,173	3,182	991	
29		Phase 2	1973	30.5	2.50%	Trended	508.00	281.00	9,000	5,008	3,819	1,189	
30		Phase 3	1983	20.5	2.50%	Trended	508.00	281.00	3,000	1,859	856	814	
31	336	Backflow Prevention Devices	2000	3.5	4.00%	Trended	385.00	372.00	3,400	3,400	478	2,924	
32		Total Net Original Cost Plant in Service							\$656,167	\$429,105	\$232,957	\$196,148	

Footnotes:

- (1) Based on Handy Whitman Indices at mid year for the last year and estimated year of original installation/replacement.
- (2) As indicated in information provided by Oak Springs for year installed and/or year replaced.
- (3) Depreciation rates based on FPSC prescribed guidelines per Chapter 25-30.140.
- (4) The parent company is not able to obtain any actual invoices or support for the original plant investment. Therefore, the Company has prepared an original cost study to support the original plant investment.
- (5) Represents the estimated cost today for similar facilities as prepared by Excel Engineering Consultants per the attached replacement cost analysis.
- (6) Represents the actual original cost of meters (including installation) based upon the documentation provided to Excel Engineering by the party that did the meter installation.
- (7) From Replacement Cost Support Schedule 1.
- (8) Estimated Franchise/Organizational Costs - Accounts 301302 anticipated to be incurred.

\$196,148

 0

 \$196,148

Replacement Cost For Water System

Florida Public Service Commission

Oak Springs MHP
Docket No.

Exhibit B
Page 1 of 1
Preparer: J. Coto/G. Morse

Line No.	Description	Unit	Quantity	Unit Price	Total Cost
1	Potable Water Transmission/Distribution System				
2	Pipe Installation				
3	2" PVC - Phase 1	LF	4,005	\$4.00	16,020
4	2" PVC - Phase 2	LF	1,060	\$4.00	4,240
5	2" PVC - Phase 3	LF	453	\$4.00	1,812
6	4" PVC - Phase 1	LF	0	\$5.00	0
7	4" PVC - Phase 2	LF	1,801	\$5.00	9,005
8	4" PVC - Phase 3	LF	1,720	\$5.00	8,600
9	6" PVC - Phase 1	LF	4,215	\$6.00	25,290
10	6" PVC - Phase 2	LF	2,442	\$6.00	14,652
11	6" PVC - Phase 3	LF	292	\$6.00	1,752
12	Total Transmission and Distribution		15,988		81,371
13	Valves, Backflow Preventers, and Fire Hydrants				
14	2" Gate Valve - Phase 1	Each	1	\$400.00	400
15	2" Gate Valve - Phase 2	Each	1	\$400.00	400
16	2" Gate Valve - Phase 3	Each	1	\$400.00	400
17	4" Gate Valve - Phase 1	Each	5	\$500.00	2,500
18	4" Gate Valve - Phase 2	Each	0	\$500.00	0
19	4" Gate Valve - Phase 3	Each	6	\$500.00	3,000
20	6" Gate Valve - Phase 1	Each	5	\$600.00	3,000
21	6" Gate Valve - Phase 2	Each	0	\$600.00	0
22	6" Gate Valve - Phase 3	Each	4	\$600.00	2,400
23	Total T&D Valves				12,100
24					
25	1" RPZ Backflow Preventor	Each	4	\$850.00	3,400
26	2" Blow-off Valve	Each	1	\$200.00	200
27	Fire Hydrant Assembly - Phase 1	Each	5	\$1,500.00	7,500
28	Fire Hydrant Assembly - Phase 2	Each	6	\$1,500.00	9,000
29	Fire Hydrant Assembly - Phase 3	Each	2	\$1,500.00	3,000
30					
31	Service Laterals				
32	1" Service Lateral -Phase 1	Each	251	\$100.00	25,100
33	1" Service Lateral -Phase 2	Each	119	\$100.00	11,900
34	1" Service Lateral -Phase 3	Each	68	\$100.00	6,800
35	Total Services		438		43,800
36					
37	5/8" Water Meter -Phase 1	Each	251	\$150.00	37,650
38	5/8" Water Meter -Phase 2	Each	119	\$150.00	17,850
39	5/8" Water Meter -Phase 3	Each	68	\$150.00	10,200
40	Total Meters		438		65,700
41					
42	Total Water Transmission/Distribution System				226,071
43					
44					
45	Potable Water Treatment Facilities				
46	8" Well #1 (458 ft.)	Each	1	\$90,000.00	90,000
47	8" Well #2 (410 ft.)	Each	1	\$80,000.00	80,000
48	20HP Motor-Well & Pump	Each	1	\$28,000.00	28,000
49	30HP Motor-Well & Pump	Each	1	\$32,000.00	32,000
50	28,000Gallon-Steel Reservoir+Aerator	Each	1	\$38,000.00	38,000
51	Hydropneumatic Tank (10,000 gal)	Each	1	\$26,000.00	26,000
52	25-HP High Service Pumps	Each	2	\$5,500.00	11,000
53	8" Water Meter	Each	2	\$10,000.00	20,000
54	6" /4" Gate Valve	Each	4	\$1,000.00	4,000
55	6" /4" Swing Check Valve	Each	4	\$1,000.00	4,000
56	6" /4" DIP	LF	200	\$22.50	4,500
57	Operation Building	SF	200	\$21.00	4,200
58	6' Chain-link Fence	LF	344	\$12.40	4,266
59	Emergency Generator (70 kW)	kW	70	\$400.00	28,000
60	Dual Cylinder Chlorination System	Each	1	\$14,000.00	14,000
61	Coleman Air Compressor (5 HP)	Each	1	\$1,400.00	1,400
62	Control Panel/Transfer Switch	Each	2	\$7,000.00	14,000
63	Electrical			\$25,000.00	25,000
64					
65	Total Water Treatment Facilities				428,366
66					
67	Estimated Land Value				3,750
68					
69	Total Estimated Replacement Cost				\$658,187
70					

Note: WTF area of 0.75 acres based on site plan
Estimated value per acre is \$5,000.

Exhibit C
Oak Springs LLC
Schedule of Utility Plant In Service Balances, Accumulated Depreciation and Rate Base

Line No.	Year	Utility Plant In Service	Accumulated Depreciation	Net Plant	Cash Working Capital (6)	Rate Base
1	December 31, 2003 (1)	\$ 429,105	\$ 232,957	\$ 196,148	\$ 5,588	\$ 201,736
2	December 31, 2004 (2)	429,105	247,575	181,530		
3	December 31, 2005 (2)	429,105	262,260	166,845		
4	December 31, 2006 (2)	430,652 (4)	277,056	153,596		
5	December 31, 2007 (2)	430,652	291,897	138,755		
6	December 31, 2008 (2)	430,652	306,737	123,915		
7	December 31, 2009 (2)	430,652	321,578	109,074		
8	December 31, 2010 (2)	430,652	336,419	94,233		
9	December 31, 2011 (2)	430,652	351,260	79,392		
10	December 31, 2012 (2)	430,652	366,101	64,551		
11	December 31, 2013 (2)	430,652	369,186	61,466		
12	December 31, 2014 (2)	430,652	378,934	51,718		
13	May 31, 2015 (3)	\$ 448,607 (5)	\$ 338,750	\$ 109,857	\$ 2,080	\$ 111,937

Notes:

- (1) Data as reflected in Order No. PSC-04-1120-PAA-WU in Docket No. 040515-WU dated November 9, 2004
- (2) Data as reflected in the Annual Report for each year respectively.
- (3) Data as reflected in the final Annual Report at the time of utility sale and filed recently with the Public Service Commission
- (4) Additions of \$1,547 for the purchase of new water meters.
- (5) Addition of \$59,900 for new service pumps and retirement of \$41,945 for original pumps.
- (6) Calculated at 1/8 of O&M costs.

#11 Department of Environmental Protection (DEP) Documents



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
Interim Secretary

July 20, 2015

Donald Horton, Owner
Oak Springs MHP, LLC
2632 S. Rochester Road, Suite 70630
Rochester Hills, MI 48307
DONALD@SUMMITMHCOMMUNITIES.COM

Re: Oak Springs MHP
PW/DW Facility ID #3350907/FLA010629
Orange County

Dear Mr. Horton:

Department personnel conducted an inspection of the above-referenced facilities on June 11, 2015. 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 Daniel Shideler at 407-897-4133 or via e-mail at Daniel.Shideler@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Hess".

Nathan Hess, Manager
Central District
Florida Department of Environmental Protection

Enclosures: Inspection Report (with attachments)

cc: Tom Felton, GENERALUTILITIES@AOL.COM

State of Florida
Department of Environmental Protection
Central District

SANITARY SURVEY REPORT

Plant Name OAK SPRINGS MOBILE HOME PARK County Lake PWS ID # 3350907
Plant Location 12 Highland Avenue, Sorrento, FL 32776 Phone 352-383-5973
Owner Name Oak Springs MHP, LLC Phone 248-521-0521
Owner Address 2632 S. Rochester RD. Suite 70630, Rochester Hills, MI, 48307
Contact Person Donald Horton Title Community Manager Phone 248-648-9170
This Survey Date 6/11/15 Last Survey Date 4/10/13 Last Compliance Inspection Date 1/5/12

PWS TYPE: Community

PLANT CATEGORY & CLASS: (5C)

MAX-DAY DESIGN CAPACITY: 576,000 gpd

PWS STATUS: Approved

TREATMENT PROCESSES IN USE

Aeration
Hypochlorination

SERVICE AREA CHARACTERISTICS

Mobile Home Park
Food Service: Yes No N/A
Number of Service Connections 331
Population Served 993 Basis Operator

OPERATION & MAINTENANCE

O&M Log: Yes No Location WTP

CERTIFIED OPERATOR: Yes

Operator(s) & Certification Class-Number:
Tom Felton C-2241

Hrs/day: *Required* *Visit *Actual* Visit
Days/wk: *Required* 5+1 *Actual* 5+1
Non-consecutive Days? Yes No N/A
Comments *Visits must add up to a cumulative total of at least 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) 46,250 gpd
Maximum Day (from MORs) 90,000 gpd 3/15
Comments

Flow Measuring Device Flow Meter
Meter Size & Type 4" Badger (2)
Date Last Calibrated 6/15/15

RAW WATER SOURCE

GROUND; Number of Wells 2
 PURCHASED from PWS ID #
 Emergency Water Source
Emergency Water Capacity

STANDBY POWER SOURCE: Yes

Source Generator
Capacity of Standby (kW) 80
Switchover: Automatic Manual
Hrs Operated Under Load 1 hr/wk.

What equipment does it operate?

Well Pumps Both
 High Service Pumps All
 Treatment Equipment All

Satisfy avg. daily demand? Yes No Unknown
Audio-visual alarm? Yes No
Comments Autodialer notifies personnel in the event of a power loss. (Sensaphone 1104)

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
Flushing Program Yes No N/A
Records Yes No N/A
Isolation Valve Exercise Yes No N/A
Records Yes No N/A
Comments Hydrants used for flushing.

CROSS CONNECTION CONTROL

BFPAs 1 # Tested 1
WWTP RPZ Yes Date Tested 09/2014
Written Plan Yes Date Unknown
Comments N/A

GROUND WATER SOURCE

Well Number (Florida Unique Well ID #)	1 (AAC3299)	2 (AAC3298)		
Year Drilled	1973	1983		
Depth Drilled	458'	410'		
Drilling Method	Cable tool	Combination		
Type of Grout	Unknown	Neat cement		
Static Water Level	47'	Unknown		
Pumping Water Level	Unknown	Unknown		
Design Well Yield	175 gpm	Unknown		
Test Yield	Unknown	Unknown		
Actual Yield (if different than rated capacity)	Unknown	Unknown		
Strainer	Unknown	Open hole		
Length (outside casing)	84'	76'		
Diameter (outside casing)	8"	8"		
Material (outside casing)	Black steel	Black steel		
Well Contamination History	None	None		
Is inundation of well possible?	No	No		
6' X 6' X 4" Concrete Pad	Yes	Yes		
SET BACKS	Septic Tank	N/A	N/A	
	Reuse Water	N/A	N/A	
	WW Plumbing	>200'	>200'	
	Other Sanitary Hazard	None observed	None observed	
PUMP	Type	Submersible	Submersible	
	Manufacturer Name	Sta-Rite	Goulds	
	Model Number	LS275-6	7TLC550	
	Rated Capacity (gpm)	375	225	
	Motor Horsepower	30	20	
Well casing 12" above grade?	Yes	Yes		
Well Casing Sanitary Seal	Ok	Ok		
Raw Water Sampling Tap	Yes	Yes		
Above Ground Check Valve	Yes	Yes		
Security	Yes	Yes		
Well Vent Protection	Yes	N/A		

COMMENTS _____

PWS ID # 3350907
 Date 06/11/15

CHLORINATION (Disinfection)

Type: Gas Hypo
 Make Pulsatron (3) Capacity 30 gpd
 Chlorine Feed Rate 100% stroke
 Avg. Amount of Cl₂ gas used N/A
 Chlorine Residuals: Plant 2.08 Remote 0.6
 Remote tap location Lift station
 DPD Test Kit: On-site With operator
 None Not Used Daily
 Injection Points Into ground storage tank
 Booster Pump Info N/A
 Comments _____

STORAGE FACILITIES

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

Tank Type/Number	G	
Capacity (gal)	28,000	
Material	Steel	
Gravity Drain	Yes	
By-Pass Piping	No	
Protected Openings	Yes	
Sight Glass or Level Indicator	Yes	
PRV/ARV	N/A	
Pressure Gauge	N/A	
On/Off Pressure	N/A	
Access Secured	Yes	
Access Manhole	Yes	
Tank Sample Tap Location	On tank	
Date of Inspection	2012/08	
Date of Cleaning	2014	

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

AERATION (Gases, Fe, & Mn Removal)

Type Cascade Capacity 500 gpm
 Aerator Condition Good
 Visible Algae Growth None
 Protective Screen Condition Good
 Frequency of Cleaning Annually
 Date Last Inspected/Cleaned 2014
 Comments _____

HIGH SERVICE PUMPS

Pump Number	1	2
Type	Centrifugal	Centrifugal
Make	Peerless	Peerless
Model	Unknown	Unknown
Capacity (gpm)	400	400
Motor HP	25	25
Date Installed	1974	1974

Comments Pumps are controlled by VFD control system (Yaskwaha P7 controllers) placed into service with permit WC-0080512-003.

MONITORING REMINDER:

- Nitrate and nitrite samples are required to be collected from the point of entry (POE) to the distribution system annually.
- Monitoring schedules are available on the Central District's Drinking Water Website.
<http://www.dep.state.fl.us/central/Home/DrinkingWater/InHouseCompliance/MonitoringSchedules/MonitoringSchedules.htm>

COMMENTS:

- 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.]

Inspector's Signature *Daniel Hilder* Title: Environmental Specialist II Date: 7/2/15

Reviewer's Signature *MA J L* Title: Environmental Manager Date: 7/20/15

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION WASTEWATER COMPLIANCE INSPECTION REPORT

FACILITY AND INSPECTION INFORMATION

@ = Optional

Name and Physical Location of Facility Oak Springs MHP 12 Highland Ave # 435 Sorrento, FL 32776 - 9620	WAFR ID: FLA010629	County Lake Phone	Entry Date/Time 06/11/15 9:30 AM @ Exit Date/Time 06/11/15 10:00 AM
Name(s) of Field Representative(s) Keshan	Title General Utilities Operator	Email	Phone
Name and Address of Permittee or Designated Representative Donald Horton Oak Springs MHP LLC 2632 S. Rochester Road, Suite 70630 Rochester Hills, MI 48307	Title President Email	Phone	@ Operator Certification #

Inspection Type: <input type="checkbox"/> C <input type="checkbox"/> E <input type="checkbox"/> I	Samples Taken(Y/N): N	@ Sample ID#:	Samples Split (Y/N):
<input checked="" type="checkbox"/> Domestic <input type="checkbox"/> Industrial	Were Photos Taken(Y/N): N	@ Log book Volume : Checklist	@ Page

FACILITY COMPLIANCE AREAS EVALUATED							
IC: In Compliance; MC: Minor Out of Compliance; NC: Out of Compliance SC: Significant Non-Compliance; NA: Not Applicable; NE or Blank: 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	NE	3. Laboratory	IC	6. Facility Site Review	IC	9. ♦ Effluent Quality
NC	2. ♦ Compliance Schedules	IC	4. Sampling	IC	7. Flow Measurement	IC	10. ♦ Effluent Disposal
		IC	5. ♦ Records & Reports	IC	8. ♦ Operation & Maintenance	IC	11. Biosolids/Sludge
						IC	12. Groundwater
IC	14. Other:					NE	13. SSO Survey

Facility and/or Order Compliance Status: <input checked="" type="checkbox"/> In-Compliance <input type="checkbox"/> Out-Of-Compliance <input type="checkbox"/> Significant-Out-Of-Compliance
Recommended Actions: Compliance Letter

Name(s) and Signature(s) of Inspector(s) Daniel Shideler	District Office/Phone Number (407)897-4133	Date 07/15/15
Signature of Reviewer Nathan Hess	District Office/Phone Number (407)897-4140	Date 7/20/15

Single Event Violation Code(s): _____, _____, _____, _____, _____
--

INSPECTION REPORT SUMMARY

Facility Name: Oak Springs MHP
Facility ID: FLA010629
Inspection Type: CEI
Date: 06/11/15 9:30 AM

FACILITY BACKGROUND:

Address: 12 Highland Ave # 435, Sorrento, FL 32776 - 9620, Lake County

Permit Information: Wastewater Permit issued: 9/09/2011, and expires: 9/7/2016

Treatment Summary: Contact Stabilization Sewage Treatment Plant W/Effluent To 2 Percolation Ponds

Permitted Capacity: 0.099

1. **Permit:** RATING – In-Compliance

1.1 Observation: A copy of the permit was onsite and available to plant personnel.

2. **Compliance Schedules:** RATING – Out-of-Compliance

2.1 Deficiency Description: According to Part VI, Schedules, of the wastewater permit, The facility was required to submit a report summarizing all TN data, supporting the ability of the facility to meet the final TN limit or proposing modifications to the plant by April 1, 2015. As of inspection date, the Compliance Schedule was not complete.

Permit/Rule or Other Reference: F.S. 403.161 Prohibitions, violations, intent. (1) 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.

Recommendation for Corrective Action: General Utilities submitted a summary of the Total Nitrogen (TN) data to the Department on July 10, 2015. No further response is needed at this time.

3. **Laboratory:** RATING – Not Evaluated

4. **Sampling:** RATING – In-Compliance

4.1 Observation: Please see specific comment

Additional Comments: The influent composite sampler was set to take flow-proportioned composites. Each sample aliquot was set at 240 mL's. The tubing was in fair condition, no dips were noted.

The effluent compositor was set to collect flow proportioned composites. Each sample aliquot was set at 250 mL's. The tubing was in fair condition. A slight dip in the sample line was noted, this was fixed during the inspection.

5. **Records and Reports:** RATING – In-Compliance

5.1 Observation: *General* - A copy of the current laboratory certification was available at the time of the inspection (62-620.350(1) F.A.C.).

Additional Comments: Routine samples are analyzed by Tri-Tech Laboratories. Nutrient samples are analyzed by Flowers Laboratory.

5.2 Observation: *General* - Operators' certifications were current and available on-site.

5.3 Observation: *General* - The certified operator's daily logbook was complete.

Additional Comments: The logbook was pre-numbered, bound, and contained sufficient operation/maintenance entries.

5.4 Observation: *General* - A copy of the Operation and Maintenance Manual as required by Chapter 62-600, F.A.C. was available to plant personnel.

5.5 Observation: *General* - Please see specific comment

Additional Comments: The DMR review period was from April 2014 through May 2015; all were submitted in a timely manner.

5.6 Observation: *General* - Please see specific comment

Additional Comments: According to onsite paperwork, the RPZ was last inspected and tested on September 14, 2014.

5.7 Observation: *General* - Please see specific comment

Additional Comments: The Department received a certification letter stating that non new non-domestic wastewater discharges have been added to the collection system since the last reclaimed water or effluent analysis was conducted on March 30, 2011.

The Annual Reuse Report was received by the Department on January 13, 2011.

Please Note: A more efficient and paperless alternative to reporting discharge and groundwater monitoring data is available at <http://www.edmr.dep.state.fl.us>.”

6. Facility Site Review: RATING – In-Compliance

6.1 Observation: *General* - The facility grounds were secured properly.

6.2 Observation: *Backflow Prevention* - A reduced pressure zone backflow prevention device was in place on the potable water supply line.

6.3 Observation: *Headworks* – Screenings are being collected in suitable containers.

6.4 Observation: *Surge Tanks* - No problems or deficiencies noted.

Additional Comments: Surge aeration is continuous.

6.5 Observation: *Aeration Basins/Act.Sludge* - The contents in the aeration chambers appeared to be adequately mixed.

6.6 Observation: *Blowers/Motors* - The blower was operational at the time of the inspection.

Additional Comments: All blowers are enclosed in a shed.

6.7 Observation: *Clarifiers* - The clarifier weirs appear to be level.

Additional Comments: Both clarifiers were receiving flow, duckweed was noted. The weirs were clean.

6.8 Observation: *Disinfection* - Please see specific comment

Additional Comments: Sodium Hypochlorite is used for disinfection a steady drip was noted in the pipe prior to the chlorine contact chamber (CCC). Some small debris and duckweed were noted in the CCC's, this was removed by operations during the inspection.

6.9 Observation: *Digesters* – Digester was full at the time of inspection.

7. **Flow Measurement:** RATING – In-Compliance

7.1 Observation: The copies of the flow calibration reports were current and satisfactory.

Additional Comments: According to onsite records, the Influent Flow Meter was calibrated on 1/23/15.

8. **Operation and Maintenance:** RATING – In-Compliance

8.1 Observation: *General* -The facility grounds are well maintained.

9. **Effluent Quality:** RATING – In-Compliance

9.1 Observation: A review of the Discharge Monitoring Reports did not reveal any effluent exceedances.

Additional Comments: The DMR review period was from April 2014 through May 2015.

10. **Effluent Disposal:** RATING – In-Compliance

10.1 Observation: *General* - The rapid infiltration basins (RIB's) appeared to be well maintained

10.2 Observation: *General* - Advisory signs were posted around the disposal site indicating the nature of the project area.

10.3 Observation: *General* - The fence surrounding the effluent disposal site provided adequate access control (62-610.518(10) F.A.C.)

10.4 Observation: *General* - Please see specific comment

Additional Comments: The south RIB was loading and a few inches of standing water was noted in the western half. The North RIB was dry.

11. **Biosolids/Sludge:** RATING – In-Compliance

11.1 Observation: *General* – According to onsite records, untreated biosolids are hauled routinely by American Pipe and Tank.

12. **Groundwater Quality:** RATING – In-Compliance

12.1 Observation: A review of the groundwater files for this facility indicates no deficiencies at this time.

13. **SSO Survey:** RATING – Not Evaluated

14. **Other:** RATING – Not Evaluated



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

CENTRAL DISTRICT
3319 MAGUIRE BOULEVARD, SUITE 232
ORLANDO, FLORIDA 32803

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

May 15, 2013

Todd Isaacs, Community Manager
Oak Springs, LLC
12 Highland Avenue
Sorrento, FL 32776
longdrive21@aol.com

Re: Oak Springs Mobile Home Park
PWS ID #3350907
Lake County - PW
OCD-CAP-13-1655

Dear Mr. Isaacs:

Department personnel conducted a sanitary survey of the above-referenced facility on April 10, 2013. Based on the information provided during and/or following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the survey report is attached for your records.

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 Manuel F. Cardona at 407-897-4134 or via e-mail at Manuel.Cardona@dep.state.fl.us.

Sincerely,

Wanda Parker-Garvin, Manager
Central District
Florida Department of Environmental Protection

WPG/mfc
Attachment

cc: Tom Felton, General Utilities Corporation [GENERALUTILITIES@AOL.COM]
Manuel Cardona, DEP Compliance Assurance Program

State of Florida
Department of Environmental Protection
Central District

SANITARY SURVEY REPORT

Plant Name OAK SPRINGS MOBILE HOME PARK County Lake PWS ID # 3350907
 Plant Location 12 Highland Avenue, Sorrento, FL 32776 Phone 352-383-5973
 Owner Name Oak Springs, LLC Phone 352-383-5973
 Owner Address 12 Highland Avenue, Sorrento, FL 32776
 Contact Person Todd Isaacs Title Community Manager Phone 352-383-5973
 This Survey Date 4/10/13 Last Survey Date 6/10/10 Last Compliance Inspection Date 1/5/12

PWS TYPE: Community

PLANT CATEGORY & CLASS: (5C)

MAX-DAY DESIGN CAPACITY: 576,000 gpd

PWS STATUS: Approved

TREATMENT PROCESSES IN USE

Aeration
Hypochlorination

SERVICE AREA CHARACTERISTICS

Mobile Home Park
 Food Service: Yes No N/A
 Number of Service Connections 331
 Population Served 993 Basis Operator

OPERATION & MAINTENANCE

O&M Log: Yes No Location WTP

CERTIFIED OPERATOR: Yes

Operator(s) & Certification Class-Number:
Tom Felton C-2241

Hrs/day: *Required* *Visit *Actual* Visit
 Days/wk: *Required* 5+1 *Actual* 5+1
 Non-consecutive Days? Yes No N/A
 Comments *Visits must add up to a cumulative total of at least 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) 58,091 gpd
 Maximum Day (from MORs) 126,000 gpd 5/12
 Comments

Flow Measuring Device Flow Meter
 Meter Size & Type 4" Badger (2)
 Date Last Calibrated 5/11/09

RAW WATER SOURCE

GROUND; Number of Wells 2
 PURCHASED from PWS ID #
 Emergency Water Source
 Emergency Water Capacity

STANDBY POWER SOURCE: Yes

Source Elliott Magnetek Model 70L (propane)
 Capacity of Standby (kW) 70
 Switchover: Automatic Manual
 Hrs Operated Under Load 1 hr/wk.
 What equipment does it operate?
 Well Pumps Both
 High Service Pumps All
 Treatment Equipment All
 Satisfy avg. daily demand? Yes No Unknown
 Audio-visual alarm? Yes No
 Comments Autodialer notifies personnel in the event of a power loss.

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
 Flushing Program Yes No N/A
 Records Yes No N/A
 Isolation Valve Exercise Yes No N/A
 Records Yes No N/A
 Comments Hydrants used for flushing.

CROSS CONNECTION CONTROL

BFPAs 1 # Tested 1
 WWTP RPZ Yes Date Tested 2012
 Written Plan Yes Date Unknown
 Comments N/A

GROUND WATER SOURCE

Well Number (Florida Unique Well ID #)	1 (AAC3299)	2 (AAC3298)		
Year Drilled	1973	1983		
Depth Drilled	458'	410'		
Drilling Method	Cable tool	Combination		
Type of Grout	Unknown	Neat cement		
Static Water Level	47'	Unknown		
Pumping Water Level	Unknown	Unknown		
Design Well Yield	175 gpm	Unknown		
Test Yield	Unknown	Unknown		
Actual Yield (if different than rated capacity)	Unknown	Unknown		
Strainer	Unknown	Open hole		
Length (outside casing)	84'	76'		
Diameter (outside casing)	8"	8"		
Material (outside casing)	Black steel	Black steel		
Well Contamination History	None	None		
Is inundation of well possible?	No	No		
6' X 6' X 4" Concrete Pad	Yes	Yes		
SET BACKS	Septic Tank	N/A	N/A	
	Reuse Water	N/A	N/A	
	WW Plumbing	>200'	>200'	
	Other Sanitary Hazard	None observed	None observed	
PUMP	Type	Submersible	Submersible	
	Manufacturer Name	Sta-Rite	Goulds	
	Model Number	LS275-6	7TLC550	
	Rated Capacity (gpm)	375	225	
	Motor Horsepower	30	20	
Well casing 12" above grade?	Yes	Yes		
Well Casing Sanitary Seal	*Ok	Ok		
Raw Water Sampling Tap	Yes	Yes		
Above Ground Check Valve	Yes	Yes		
Security	Yes	Yes		
Well Vent Protection	Yes	N/A		

COMMENTS * Need to seal opening where pump electrical wiring enters the sanitary seal.

PWS ID # 3350907
 Date 4/10/13

CHLORINATION (Disinfection)

Type: Gas Hypo
 Make Pulsatron (3) Capacity 30 gpd
 Chlorine Feed Rate 100% stroke
 Avg. Amount of Cl₂ gas used N/A
 Chlorine Residuals: Plant 2.08 Remote >2.2
 Remote tap location Office
 DPD Test Kit: On-site With operator
 None Not Used Daily
 Injection Points Into ground storage tank
 Booster Pump Info N/A
 Comments _____

STORAGE FACILITIES

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

Tank Type/Number	G	H
Capacity (gal)	28,000	10,000
Material	Steel	Steel
Gravity Drain	Yes	Yes
By-Pass Piping	No	Yes
Protected Openings	Yes	Yes
Sight Glass or Level Indicator	Yes	Yes
PRV/ARV	N/A	PRV
Pressure Gauge	N/A	Yes
On/Off Pressure	N/A	51/66
Access Secured	Yes	Yes
Access Manhole	Yes	Yes
Tank Sample Tap Location	On tank	On tank
Date of Inspection	2010/11	2010/11
Date of Cleaning	2010/11	2010/11

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

HIGH SERVICE PUMPS

Pump Number	1	2
Type	Centrifugal	Centrifugal
Make	Peerless	Peerless
Model	Unknown	Unknown
Capacity (gpm)	400	400
Motor HP	25	25
Date Installed	1974	1974

Comments _____

AERATION (Gases, Fe, & Mn Removal)

Type Cascade Capacity 500 gpm
 Aerator Condition Good
 Visible Algae Growth None
 Protective Screen Condition Good
 Frequency of Cleaning Annually
 Date Last Inspected/Cleaned 07/2012
 Comments _____

DEFICIENCIES:

At the time of the inspection, an opening was noted where the well pump #1 electrical wiring enters the sanitary seal. In an email dated April 12, 2103, Mr. Isaacs indicated that this issue had been corrected.

COMMENTS/REMINDERS:

- For monitoring schedules and information about the Drinking Water Program, please visit the Central District's Drinking Water website at <http://www.dep.state.fl.us/central/Home/DrinkingWater/default.htm>
- 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.]

Inspector *Michael Handon* Title Env. Specialist III Date 5/10/13

Approved by *Wanda Parker Harris* Title Environmental Manager Date 5/15/13



Annual Drinking Water Quality Report
 A Publication for Oak Springs MHP
 PWS ID 3350907
 Report for year 2015
 Prepared 2016

We are pleased to present you with this year's Annual Water Quality Report. This report is designed to inform you about the quality of water and services we have delivered to you every day. Our constant goal is to provide you with a safe and dependable supply of drinking water. We want you to understand the efforts we make to continually improve the water treatment process and protect our water resources.

Our water is produced by two groundwater wells that draw water from the Floridan Aquifer and is disinfected by chlorination.

If you have any questions concerning your water utility, please contact General Utilities at (787-2493) between the hours of

8:00 a.m. and 5:00 p.m. We want our valued customers to be informed about their water utility.

Oak Springs MHP routinely monitors for contaminants in your drinking water according to Federal and State laws.

The state allows us to monitor for some contaminants less than once per year because the concentration for these contaminants do not change frequently. Except when indicated otherwise, this report is based on the results for the period January 1 to December 31, 2015. All water analyses are the most recent sampling in accordance with the Safe Water Drinking Act.

In this table, you will find many terms and abbreviations you might not be familiar with. To help you better understand these terms, we've provided the following definitions:

Parts per million (ppm) or Milligrams per liter (mg/L): One part by weight of analyte to 1 million parts by weight of water sample.

Parts per billion (ppb) or Micrograms per liter (ug/l): One part by weight of analyte to 1 billion parts by weight of water sample.

Picocurie per liter (pCi/L): Picocuries per liter is a measure of the radioactivity in water.

Action Level (AL): the concentration of a contaminant, which, if exceeded, triggers treatment or other requirements, which a water system must follow.

N/A: means not applicable.

(NTU) Nephelometric Turbidity Unit: Measure of the clarity of water. Turbidity in excess of 5 NTU is just noticeable to the average person.

Maximum Contaminant Level (MCL): The "Maximum Allowed" (MCL) is the highest level of a contaminant that is allowed in drinking water. MCL's are set as close to the MCLG's as feasible using the best available treatment technology.

Maximum Contaminant Level Goal (MCLG): The "Goal" (MCLG) is the level of a contaminant in drinking water below, which there is no known or expected risk to health. MCLG's allow for a margin of safety.

Maximum Residual Disinfectant Level or MRDL: The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.

Maximum Residual Disinfectant Level Goal or MRDLG: The level of a drinking water disinfectant below, which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.

FDEP: Florida Department of Environmental Protection

USEPA: United States Environmental Protection Agency.

TEST RESULTS TABLE

Results in the "Level Detected" column for Radiological and Inorganic contaminants are from individual samples.

Inorganic Contaminants

Contaminant and Unit of Measurement	Dates of Sampling	MCL Violation Y/N	Level Detected	Range of results	MCLG	MCL	Likely Source of Contamination
Antimony (ppb)	2/2015	N	3.1	N/A	6	6	Discharge from petroleum refineries; fire retardants; ceramics; electronics; solder
Arsenic (ppb)	2/2015	N	1.7	N/A	0	10	Erosion of natural deposits; runoff from orchards; runoff from glass and electronics production wastes
Barium (ppm)	2/2015	N	0.0097	N/A	2	2	Discharge of drilling wastes; discharge from metal refineries; erosion of natural deposits
Chromium (ppb)	2/2015	N	7.0	N/A	100	100	Discharge from steel and pulp mills; erosion of natural deposits
Fluoride (ppm)	2/2015	N	0.088	N/A	4	4.0	Erosion of natural deposits; discharge from fertilizer and aluminum factories. Water additive which promotes strong teeth when at optimum level of 0.7 ppm
Nickel (ppb)	2/2015	N	2.4	N/A	N/A	100	Pollution from mining and refining operations. Natural occurrence in soil
Nitrate (as Nitrogen) (ppm)	2/2015	N	0.03	N/A	10	10	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.
Selenium (ppb)	2/2015	N	5.8	N/A	50	50	Discharge from petroleum and metal refineries; erosion of natural deposits; discharge from mines
Sodium (ppm)	2/2015	N	20	N/A	N/A	160	Salt water intrusion and soil leaching

Synthetic Organic Contaminants including Pesticides and Herbicides

Contaminant and Unit of Measurement	Dates of Sampling	MCL Violation Y/N	Level Detected	Range of results	MCLG	MCL	Likely Source of Contamination
Dalapon (ppb)	2/2015	N	0.48	N/A	200	200	Runoff from herbicide used on rights of way

Stage 2 Disinfectant/Disinfection By-Product (D/DBP) Parameters

Contaminant and Unit of Measurement	Dates of Sampling (Mo./yr.)	MCL Violation Y/N	Level Detected	Range of results	MCLG Or MRDLG	MCL Or MRDL	Likely Source of Contamination
Chlorine (ppm)	1-12/2015	N	1.8	1.5-2.35	MRDLG =4	MRDL =4.0	Water additive to control microbes
Haloacetic Acids (five) (HAA5) (ppb)	9/2015	N	6.24	N/A	N/A	MCL=60	By-product of drinking water disinfection
TTHM (total trihalomethanes) (ppb)	9/2015	N	12.6	N/A	N/A	MCL=80	By-product of drinking water disinfection

Lead and Copper (Tap Water)

Contaminant and Unit of Measurement	Dates of Sampling (mo./yr.)	AL Violation Y/N	90 th Percentile Results	No. of sampling sites exceeding the AL	MCLG	MCL	Likely source of contamination
Copper (tap water) (ppm)	7/2015	N	0.052	0	1.3	1.3	Corrosion of household plumbing systems; erosion of natural deposits; leaching from wood preservative
Lead (tap water) (ppb)	7/2015	N	0.34	0	0	15	Corrosion of household plumbing systems; erosion of natural deposits

The sources of drinking water (both tap water and bottled water) include rivers, lakes, streams, ponds, reservoirs, springs and wells. As water travels over the surface of the land and through the ground, it dissolves naturally occurring minerals and, in some cases, radioactive material, and can pick up substances resulting from the presence of animals or from human activity.

Contaminants that may be present in source water include:

- (A): Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic systems, agricultural livestock, and wildlife.
- (B): Inorganic contaminants, such as salts and metals, which can be naturally occurring or result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining or farming.
- (C): Pesticides and herbicides, which may come from a variety of sources such as agriculture, urban stormwater runoff and residential uses.
- (D): Organic chemical contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban stormwater runoff and septic systems.
- (E): Radioactive contaminants, which can be naturally occurring or be the result of oil and gas production and mining activities.

In order to ensure that tap water is safe to drink, USEPA prescribes regulations, which limit the amount of certain contaminants in water provided by public water systems. Food and Drug Administration regulations establish limits for contaminants in bottled water, which must provide the same protection for public health.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of contaminants. The presence of contaminants does not necessarily indicate that the water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the US Environmental Protection Agency's Safe Drinking Water Hotline at 1-800-426-4791.

MCL's are set at very stringent levels. To understand the possible health effects described for many regulated contaminants, a person would have to drink two (2) liters of water every day at the MCL level for a lifetime to have a one-in-a-million chance of having the described health effect.

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home plumbing. Oak Springs is responsible for providing high quality drinking water, but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for 30 seconds to 2 minutes before using water for drinking or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at <http://www.epa.gov/safewater/lead>.

In 2015 the Department of Environmental Protection performed a Source Water Assessment on our system. These assessments were conducted to provide information about any potential sources of contamination in the vicinity of our wells. For each well the assessment showed one type from three potential sources of contaminant: two Domestic Wastewater sources with low levels of contamination risk susceptibility. The assessment results are available on the FDEP website link = www.dep.state.fl.us/swapp/

Some people may be more vulnerable to contaminants in drinking water than the general population. Immune-compromised persons such as persons with cancer undergoing chemotherapy, persons who have undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. USEPA and the Center for Disease Control guidelines on appropriate means to lessen the risk of infection by cryptosporidium and other microbiological contaminants are available from the Safe Drinking Water Hotline (1-800-426-4791).

We at Oak Springs MHP work around the clock to provide top quality water to every tap. We ask that all our customers help us protect our water sources, which are the heart of our community, our way of life and our children's future.