


State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: May 30, 2017
TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Traci Matthews, Engineering Specialist, Division of Engineering *POE* 
RE: Docket No. 160165-SU-Application for staff-assisted rate case in Gulf County by
ESAD Enterprises, Inc. d/b/a Beaches Sewer Systems, Inc.

Please file the attached documents from F. Seifert Re: Docket No. 160165-SU (Note: document referenced in paragraph B of attachment was not included) in the above mentioned docket file.

Thank you

Traci Matthews

From: SEIFERT <seifert13@msn.com>
Sent: Tuesday, May 30, 2017 11:31 AM
To: Traci Matthews
Subject: My concerns
Attachments: Scan_Doc0111.pdf; Scan_Doc0112.pdf

see attached and please advise

thanks

Frank

ESAD Enterprises, Inc.

Beaches Sewer System

509 4th Street

850-227-9875

Port St Joe, FL 32456

May 30, 2017

Traci Matthews

Engineer Specialist

Florida Public Service Commission

RE: Docket Number 160165-SU

Dear MS Matthews:

As I was denied the opportunity to discuss the case in person, after much thought, I decide to send this to you. This need was to make the staff aware that certain projects are not capital improvements but expense items. To be a capital item it should be that it improves or replaces a capital item. If we replace a pump in one of our lift stations, that would be capital, but if we remove thrash from our plant that cannot be capital. My items of concern are as follows:

- A) Removal of sand and grit – This should be an ongoing expense. The trash removed from the plant does not add to the plant, only removes what should not be in it. We will spread this cost over a two year period and then try to remove it all along. It is like take your home trash out of your house, does not increase the value of your house.

- B) Replacing pumps etc from our lift stations – The value of our lift stations per the PSC total is \$32,206.00. To replace the two would cost per our engineer (see attached) \$ 150,000.00. If we replace one pump at a cost of \$ 5,000, this is only .0333 percent of the cost to replace. The reason this bothers me is that future depreciation should be in relationship to the value of the capital items.

- C) The ponds – We must accordingly to our permit with DEP keep them free of vegetation, this must be done every year, sometimes more often. DEP inspected our plant and said we must remove the vegetation. This was last done in the fall of 2016, now a little over six months it is

back. This expense should cost us between two to three thousand dollars each year. Our permit calls for us to scarify the ponds each year. At present we do not have the equipment to do this. One piece of the equipment will cost us between \$ 750.00 to \$ 1,250.00.

D) The fence- We must replace the fence at the back of the plant. Before we can do this we must remove all the trees, brush, and other vegetation to get to the area where the fence needs to be. The cost of the fence will be \$ 2,500.00, but the cost to remove all of the vegetation will cost us between \$ 6,000.00 to \$ 8,000.00. This should not be capitalize, just the fence.

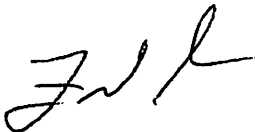
E) Our permit requires us to rotate the ponds every seven day. We have to lower all the lines at the Plant in order for the water to flow to the different ponds. I believe that this is going to cost us Between \$4,000 to \$ 5,000. Must get this done because of DEP

F) French drain – We have a French drain that because of two different set of drawings, we may To move the lines. See DEP report. I hope we don't but unsure at this time.

As you can see from the above, if all the items are capitalized we will not be able to get things done. Keeping grit out of our plant is needed now, fixing the fence is needed now, fixing the ponds is needed now. Getting the funds over a few years will not solve the problem.

Your commits are welcome.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank J Seifert', written in a cursive style.

Frank J Seifert,

President

Re: List of deficiencies for beaches sewer system WWTP
FLA010101

SEIFERT <seifert13@msn.com>

Fri 5/5/2017 2:16 PM

To: Grantham, Lucas <Lucas.Grantham@dep.state.fl.us>;

1 attachments (1 MB)

Scan_Doc0106.pdf;

Attached is item 4 - flow meter calibration
Attached is item 8 - biosolids annual summary

Frank J Seifert
President

From: Grantham, Lucas <Lucas.Grantham@dep.state.fl.us>
Sent: Thursday, May 4, 2017 12:30 PM
To: Seifert13@msn.com
Cc: pfarrell@gcpsflorida.com; themattg@yahoo.com; Allen, Kim; Penton, Josie
Subject: List of deficiencies for beaches sewer system WWTP FLA010101

As mentioned during the inspection, here is the list of deficiencies noted on 5/3/2017. Feel free to provide feedback via e-mail or by writing it in directly to the word document provided. If you choose the latter please change the font color to RED to clearly denote your changes.

Thank You,
Lucas Grantham



Lucas Grantham
Environmental Specialist
Florida Department of Environmental Protection
Panama City Office
470 Harrison Avenue
Panama City, Florida 32401
Lucas.Grantham@dep.state.fl.us
Office: 850.767.0041
Fax: 850.872.7790

Beaches Sewer System Deficiency List for 5/3/2017 Inspection

1. Chlorine Gels (secondary standards) were out of date. They had expired on September 1, 2015.

Recommended action: Order new standards and provide the department with an expected date of delivery.

2. The liquid DPD1b bottle had expired on 10/16.

Recommended action: Order a new bottle of liquid DPD1B to test the chlorine residual and provide the department with an expected date of delivery.

Note: The DPD powder I mentioned during the inspection can be found here <https://www.usabluebook.com/p-277733-hach-dpd-4-total-powder-pillows-for-10-ml-sample-100pk-2105669.aspx>. This is for a 10mL sample and may not be compatible for your particular meter. You simply pour in one pack to 10mL and wait 3minutes. They could make chlorine residual sampling easier for you but they are not required. What you are using is acceptable so long as they remain within expiration dates.

3. The January 2015 DMR had an incorrect value written in. Two fecal samples were taken that month as per permit. However, the average of the two (1.8 and 2.0) was reported under the maximum value. Essentially 1.9 was reported on the DMR rather than the 2.0 which was the true max value that month. **This difference of 0.1 does not require resubmittal of the DMR.** This should no longer be an issue either, as the permit only requires 1 sampling event per month. This is mentioned here because it was noted during the inspection and deserved to be cleared up.

Recommended action: NONE

4. There was no receipt of flow meter calibration present at the time of the inspection.

Recommended action: Please send a copy to the department (lucas.grantham@dep.state.fl.us) via email.

5. The percolation ponds are not being rotated as required by the permit. Only one pond is being utilized due to issues with the piping.

Recommended action: Rotate the percolation ponds as described by the permit. 7 days on and 7 days off. Provide pictures of the solution that was implemented to allow rotation to occur.

6. The percolation ponds are overgrown and not being maintained.

Recommended action: Maintain the percolation ponds so that the bottoms are free of vegetation and scarified. Provide photos showing the clearing of the vegetation from the pond.

7. The fence on the west side of the property was broken.

Recommended action: Repair the fence to maintain site security. Provide pictures of the repaired fence.

8. The department has not received a copy of the 2016 Biosolids annual summary which was due on February 19, 2017.

Recommended action: It was mentioned at the time of the inspection that the Biosolids Annual Summary had been completed. However, there are no records of the report on file. Please resubmit the 2016 Biosolids Annual Summary to lucas.grantham@dep.state.fl.us.

9. The full gas chlorine tanks to be used next were not chained to the wall.

Recommended action: Chain all the tanks to the wall and provide a picture.

10. The gas chlorine tank that is in use must be on top of a scale.

Recommended action: Place the gas chlorine tank on top of the scale that was in the gas chlorine room, given that it is operational.

11. The container for the rags and debris removed from the plant waiting on transport to the landfill was not covered.

Recommended action: Provide a lid for the container that was in use at the plant and provide a picture.

12. According to the representative at the plant during the inspection, the French drain from the sump pump in the SW of the plant drains into the percolation pond. According to the permit this is required to drain into the polishing pond that is not being filled with reclaimed water.

Recommended action: This may have been a communication error. If this is true then please confirm the sump pump goes into the unused polishing pond. If this was not a communication error, please direct drainage into the unused polishing pond and provide photo evidence of this.

13. No sign stating the "nature of the project" on the fence.