

Holland & Knight

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April 15, 2026

Via Efile

Adam Teitzman
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20260027-WS - Application for transfer of CPI Citrus Park Utility TRS, L.L.C.'s water and wastewater facilities, in Lee County, to Bonita Springs Utilities, Inc., an exempt entity under Section 367.022(7), F.S., and cancellation of Certificate Nos. 675-W and 576-S.

Dear Mr. Teitzman:

CPI Citrus Park Utility TRS, L.L.C. (the "Applicant/Seller") respectfully submits its responses to Commission Staff's letter dated March 19, 2026 ("Staff Letter"), which identified certain deficiencies to the Applicant/Seller's application submitted on February 19, 2025. For ease of reference, the deficiencies set forth in the Staff Letter are repeated verbatim herein, with the Applicant/Seller's response immediately following each item.

1. **Notice of Application.** Rule 25-30.030(6), Florida Administrative Code (F.A.C.), states that all applications requiring noticing shall be deemed deficient until affidavits of noticing required by Sections 367.045(1)(e) and (2)(t), Florida Statutes, along with a copy of the notice, are filed with the Office of Commission Clerk. After staff has reviewed and approved the notice of application, and the notices have been distributed in accordance with Rule 25-30.030(5), F.A.C., please provide affidavits of noticing.

Response: Enclosed as "Attachment 1" for staff's review and approval is the proposed Notice of Application for Authority to Transfer a Regulated Utility to an Exempt Entity. Furthermore, in accordance with Rule 25-30.030(2), F.A.C., please provide the undersigned with the list of governmental entities and utilities that should receive this notice.

2. **Applicant Documentation.** Rule 25-30.037(2)(r), F.A.C., states that all applications shall provide the documents specified by subsections 1 through 4 for the utility, however,

Mr. Adam Teitzman

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the documents provided were for the Buyer and not the Seller. Please provide the specified documents for the Seller.

Response: Pursuant to Rule 25-30.037(2)(r)(1), enclosed as “Attachment 2” are copies of the Applicant/Seller’s current permits from the Florida Department of Environmental Protection (“FDEP”) and the South Florida Water Management District (“SFWMD”).

Pursuant to Rule 25-30.037(2)(r)(2), enclosed as “Attachment 3” are copies of the most recent FDEP and/or county health department sanitary survey, compliance inspection report, and secondary standards drinking water report.

Pursuant to Rule 25-30.037(2)(r)(3), enclosed as “Attachment 4” are copies of all the Applicant/Seller’s correspondence with the FDEP, the county health department and the SFWMD including consent orders and warning letters and the Applicant/Seller’s responses to the same for the past five (5) years.

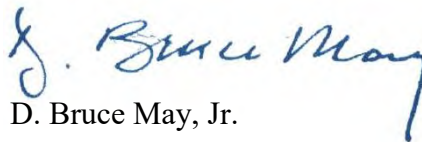
Pursuant to Rule 25-30.037(2)(r)(4), this is to advise that Applicant/Seller has received no customer complaints regarding FDEP secondary water quality standards during the past five (5) years.

* * *

Should you have any questions regarding this filing, please do not hesitate to contact me. Thank you for your consideration.

Sincerely,

HOLLAND & KNIGHT LLP



D. Bruce May, Jr.

DBM:kjg

Enclosures

cc: Major Thompson, Esq.
Mr. Orlando Wooten
Jennifer Crawford, Esq.
Mr. Pierre Molster
Mr. Andrew Koebel
Mr. Steve Richards
Mr. John R. Jenkins

ATTACHMENT 1

NOTICE OF APPLICATION FOR TRANSFER OF CPI CITRUS PARK UTILITY TRS, L.L.C.'S WATER AND WASTEWATER FACILITIES, IN LEE COUNTY, TO BONITA SPRINGS UTILITIES, INC., AN EXEMPT ENTITY UNDER SECTION 367.022(7), F.S., AND CANCELLATION OF CERTIFICATE NOS. 675-W AND 576-S.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 20260027-WS

(Section 367.045, Florida Statutes)

NOTICE

Notice is hereby given on this ___ day of _____, 2026, pursuant to Rule 25-30.030, Florida Administrative Code, of the application for transfer of water and wastewater utility facilities of CPI Citrus Park Utility TRS, L.L.C. to Bonita Sprints Utilities, Inc., an exempt entity under Section 367.022(7), Florida Statutes, and cancellation of certificate numbers 675-W and 576-S in Lee County, Florida. The utility service areas to be transferred are described as follows:

WATER UTILITY SERVICE AREA - LEGAL DESCRIPTION

THE EAST 150 FEET OF THE WEST 1120 FEET OF THE NORTH 260 FEET OF SECTION 19, TOWNSHIP 47 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT NORTHWEST CORNER OF SAID SECTION 19 RUN N89°16'57"E ALONG THE NORTH LINE OF SAID SECTION 19 FOR A DISTANCE OF 970.01 FEET TO THE POINT OF BEGINNING; THENCE CONTINUE N89°16'57"E ALONG SAID NORTH LINE FOR A DISTANCE OF 150.00 FEET; THENCE LEAVING SAID NORTH LINE RUN S01°00'52"E ALONG A LINE 1120 FEET EAST OF AND PARALLEL TO THE WEST LINE OF SAID SECTION 19 FOR A DISTANCE OF 260.00 FEET; THENCE RUN S89°16'57"W ALONG A LINE 260 FEET SOUTH OF AND PARALLEL TO THE NORTH LINE OF SAID SECTION 19 FOR A DISTANCE OF 150.00 FEET; THENCE RUN N01°00'52"W ALONG A LINE 970 FEET EAST OF AND PARALLEL TO THE WEST LINE OF SAID SECTION 19 FOR A DISTANCE OF 260.00 FEET TO THE POINT OF BEGINNING.

SAID LAND CONTAINING 39,000.52 SQUARE FEET OR 0.90 ACRES MORE OR LESS.

BEARINGS SHOWN HEREON ARE BASED ON AN BEARING OF N89°16'57"E ON THE NORTH LINE OF THE NORTHWEST QUARTER OF SECTION 19, TOWNSHIP 47 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA.

WASTEWATER UTILITY SERVICE AREA - LEGAL DESCRIPTION

THE WEST 440 FEET OF THE SOUTH 1070 FEET OF THE NORTH 1310 FEET OF SECTION 19, TOWNSHIP 47 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA, AND BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT NORTHWEST CORNER OF SAID SECTION 19 RUN S01°00'52"E ALONG THE WEST LINE OF SAID SECTION 19 FOR A DISTANCE OF 240.00 FEET TO THE POINT OF BEGINNING; THENCE LEAVING SAID WEST LINE RUN N89°16'57"E ALONG A LINE 240 FEET SOUTH OF AND PARALLEL TO THE NORTH LINE OF SAID SECTION 19 FOR A DISTANCE OF 440.01 FEET; THENCE RUN S01°00'52"E ALONG A LINE 440 FEET EAST OF AND PARALLEL TO THE SAID WEST LINE FOR A DISTANCE OF 1070.01 FEET; THENCE RUN S89°16'57"W ALONG A LINE 1370 FEET SOUTH OF AND PARALLEL TO THE NORTH LINE OF SAID SECTION 19 FOR A DISTANCE OF 440.01 FEET; THENCE RUN N01°00'52"W ALONG SAID WEST LINE FOR A DISTANCE OF 1070.01 FEET TO THE POINT OF BEGINNING.

SAID LAND CONTAINING 470,806.33 SQUARE FEET OR 10.81 ACRES MORE OR LESS.

BEARINGS SHOWN HEREON ARE BASED ON AN BEARING OF N89°16'57"E ON THE NORTH LINE OF THE NORTHWEST QUARTER OF SECTION 19, TOWNSHIP 47 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA.

Any objection to the said 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, with a copy to D. Bruce May, Jr., Esq., Holland & Knight LLP, 315 S. Calhoun Street, Suite 600, Tallahassee, Florida 32301, within thirty (30) days from the date of this notice. The objection must state the grounds for the objection with particularity.

CPI CITRUS PARK UTILITY TRS, L.L.C.
Steven P. Adler
12629 New Brittany Blvd.
Building #116
Fort Myers, FL 33907
Office: 239-790-0004
Fax: 239-275-0648
CPICitrusParkUtility@gmail.com

ATTACHMENT 2

Mission:

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June 24, 2013

PERMITTEE:

Tamara Swan
Citrus Park Trost International Inc.
25501 Trost Boulevard
Bonita Springs, FL 34135

ID No.: 5360048
Permit/Cert. No.: 0197637-005WC3C
Date of Issue: 06/24/2013
Expiration Date: 06/24/2018
County: Lee
Project: Citrus Park 2013 Water Plant Improvement

This Permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, 62-550, 62-555 and 62-699. The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Florida Department of Health Lee County, Environmental Engineering, hereafter known as the Department and made a part hereof and specifically described as follows:

To construct 0.1 MGD reverse osmosis water treatment system, modify the existing high service and fire pump electrical systems through the addition of adjustable frequency drives; replace hydropneumatic tank with a bladder tank, install a degasifier with storage tank and transfer pumps, replace well #3 250 gpm pump with a 120 gpm pump to better control blending rates. The work will also include site piping, valves and controls to integrate operation of the reverse osmosis system and degasifier as well as removal of the existing tray aerator from the ground storage tank.

This project will be constructed according to engineering plan prepared by Murchkey Utility Engineering, LLC, signed and sealed on June 4, 2013. The applications and documentation were received on June 5, 2013.

The Project is located in Citrus Park, west side of the 4th street and north of Hamlin Road.

This Permit includes the appurtenances and accessories but not the other unrelated construction.

GENERAL CONDITIONS(if applicable):

The permittee shall be aware of and operate under the Permit Conditions below. These applicable conditions are binding upon the permittee and enforceable pursuant to Chapter 403, Florida Statutes. [F.A.C. Rule 62-555.533(1)]

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859

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through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (reasonable time may depend on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

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- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rule 62- 4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (BACT)
 - b. Determination of Prevention of Significant Deterioration (PSD)
 - c. Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
 - d. Compliance with New Source Performance Standards
14. The permittee shall comply with the following:

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- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- i. the date, exact place, and time of sampling or measurements;
 - ii. the person responsible for performing the sampling or measurements;
 - iii. the dates analyses were performed;
 - iv. the person responsible for performing the analyses;
 - v. the analytical techniques or methods used;
 - vi. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS(if applicable):

Regulatory Section:

1. All construction must be in accordance with this permit. Before commencing work on project changes for which a construction permit modification is required per 62-555.536(1), the permittee shall submit to the Department a written request for a permit modification. Each such request shall be accompanied by one copy of a revised construction permit application, the proper processing fee and one copy of either a revised preliminary design report or revised drawings, specifications and design data. [F.A.C. Rule 62-555.536].
2. Permitted construction or alteration of public water supply systems must be supervised during construction by a professional engineer registered in the State of Florida if the project was designed under the responsible charge of a professional engineer licensed in the State of Florida. The

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permittee must retain the service of a professional engineer registered in the State of Florida to observe that construction of the project is in accordance with the engineering plans and specifications as submitted in support of the application for this permit. [F.A.C. Rule 62-555.520(3)].

3. If prehistoric or historic artifacts, such as pottery or ceramics, stone tools or metal implements, dugout canoe remains, or any other physical remains that could be associated with Native American cultures, or early colonial or American settlement are encountered at any time within the project site area, the permitted project should cease all activities involving subsurface disturbance in the immediate vicinity of such discoveries. The permittee, or other designee, should contact the Florida Department of State, Division of Historical Resources, Compliance and Review Section at 850.245.6333 or 800.847.7278, as well as the appropriate permitting agency office. Project activities should not resume without verbal and/or written authorization from the Division of Historical Resources and the permitting agency. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, *Florida Statutes*.

4. In accordance with General Condition #11 of this permit, this permit is transferable only upon Department approval. Persons proposing to transfer this permit must apply jointly for a transfer of the permit within 30 days after the sale or legal transfer of ownership of the permitted project that has not been cleared for service by the Department using form, 62-555.900(8), Application for Transfer of a PWS Construction Permit along with the appropriate fee. [F.A.C. Rule 62-555.536(5)]

5. This permit satisfies Drinking Water permitting requirements only and does not authorize construction or operation of this facility prior to obtaining all other necessary permits from other program areas within the Department, or required permits from other state, federal, or local agencies.

6. This permit is for CONSTRUCTION ONLY of the distribution system project. This permit shall not infer that the clearance necessary for connection will be granted. Any such clearance shall be granted only when the connection point has been permitted and cleared for use by the Department and the public water system to which the water main extension will be connected, has the capacity necessary to meet the design water demands of all customers to be served by the water main extension. Partial clearance may be granted, if required.

7. If gasoline contamination is found at the construction site, work shall be stopped and the proper authorities notified. With the approval of the Department, ductile iron pipe and fittings, and solvent resistant gaskets materials shall be used in the contaminated area. The ductile pipe shall be used in the contaminated area. The ductile iron pipe shall extend 100 feet beyond any solvent noted. Any contaminated soil that is excavated shall be placed on an impermeable mat, covered with waterproof covering, and held for disposal. If the site cannot be properly cleaned, then consultation with the Department is necessary prior to continuing with the project construction.

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8. This permit does not constitute approval of construction on jurisdictional wetland areas; therefore such approval must be obtained separately from the Water Management District or from DEP ERP Section, as applicable, Permittee shall provide a copy of the permit approval to the Department if water main installation involves activities on wetlands.

9. Suppliers of water shall notify the appropriate DEP District Office or ACHD and affected water customers by no later than the previous business day before initiating any planned permanent or temporary conversion from free chlorine to chloramines or vice versa for disinfection. [F.A.C. Rule 62-555.350(10)(c)]

10. Permittee shall ensure that the well and drinking water treatment facilities will be protected to prevent tampering, vandalism, and sabotage as required by Rule 62-555.315(1) & 62-555.320(5), F.A.C.

Construction Standards:

All products, including paints, which shall come into contact with potable water, either directly or indirectly, shall conform with National Sanitation Foundation (NSF) International, Water Chemicals Codex, Food Chemicals Codex, American Water Works Association (AWWA) Standards and the Food and Drug Administration, as provided in Rule 62-555.320(3), F.A.C.

2. Water supply facilities, including mains, pipe, fittings, valves, fire hydrants and other materials shall be installed in accordance with the latest applicable AWWA Standards and Department rules and regulations. The system shall be pressure and leak tested in accordance with AWWA Standard C600 C603, or C605, as applicable, and disinfected in accordance with AWWA Standard C651-653, as well as in accordance with Rule 62-555.340, F.A.C.
3. The installation or repairs of any public water system, or any plumbing in residential or nonresidential facilities providing water for human consumption, which is connected to a public water system shall be lead free in accordance with Rule 62-555.322, F.A.C.
4. When any existing asbestos cement (AC) pipes are replaced under this permit, the permittee shall do so in accordance with the applicable rules of Federal Asbestos Regulation and Florida DEP requirements. For specific requirements applicable to AC pipes, the permittee should contact the Air and Waste Management section managers prior to commencing any such activities at (xxx) xxx-xxxx. Please be aware that a notification is required to be submitted to the Department for a regulated project.
5. Setback distances between potable water wells and sanitary hazards shall be in accordance with 62-555.312, F.A.C. Reclaimed water land application areas must not be located within the setback distance from potable water supply wells established in Chapter 62-610, F.A.C.

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6. Permittee shall maintain vertical clearance and horizontal separation between water mains and sanitary sewers, storm sewers, etc. unless approved otherwise by the Department, as provided in Rule 62-555.314, F.A.C., and Section 8.6 of *Recommended Standards for Water Works*, a manual adopted by reference in Rule 62-555.330(3), F.A.C.
7. The new or altered aboveground piping at the drinking water treatment plant shall be color coded and labeled as recommended in Section 2.14 of "Recommended Standards for Water Works, 1997 Edition". [F.A.C. Rule 62-555.320(10)]
8. Permittee shall ensure that there shall be no cross-connection with any non-potable water source in accordance with Rule 62-555.360, F.A.C.
9. The hydropneumatic tank that will be utilized for this project must meet ASME code requirements for the construction and installation of unfired pressure vessels, as provided in Rule 62-555.320(20), F.A.C., and Section 7.2 of *Recommended Standards for Water Works*, a manual adopted by reference in Rule 62-555.330(3), F.A.C. {OPTIONAL}

Operational Requirements

1. The facility has been classified as a Category II, Class C water treatment plant. Accordingly, the lead or chief operator must be Class C or higher. Proof of staffing by a Class C or higher operator for [3 hours/day for 5 days/week and 1 visit(s) on each weekend day] must be provided. [F.A.C. Rule 62-699.310] (Note: This condition would be added when appropriate and would be tailored to the WTP.)
2. The supplier of water shall operate and maintain the public water system so as to comply with applicable standards in F.A.C. Rule 62-550 and 62-555.350.
3. The permittee shall provide an operation and maintenance manual for the new or altered treatment facilities to fulfill the requirements under subsection 62-555.350(13), F.A.C. The manual shall contain operation and control procedures, and preventative maintenance and repair procedures, for all plant equipment and shall be made available for reference at the plant or at a convenient location near the plant. Bound and indexed equipment manufacturer manuals shall be considered sufficient to meet the requirements of the subsection.
4. The permittee shall submit a monthly operations report (MOR) DEP Form 62-555.900(3), to the Department no later than the tenth of each succeeding month.

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5. The permittee shall have complete record drawings produced for the project in accordance with Rule 62-555.530(4), F.A.C.
6. The permittee or suppliers of water shall telephone the State Warning Point (SWP), 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 in accordance with the F.A.C. Rule 62-555.350(10).

Monitoring Provisions

1. Permittee shall follow the guidelines of Chapters 62-550, 62-555, and 62-560, F.A.C., regarding public drinking water system standards, monitoring, reporting, permitting, construction, and operation.

This facility is a Community Water System as defined in F.A.C. Rule 62-550.200(12) and shall comply with the applicable chemical, radiological, lead and copper, and bacteriological monitoring requirements of F.A.C. Rule 62-550. Such requirements shall be initiated within the quarter that the water treatment facility is placed into service (i.e. January – March or April – June, the preceding are examples of quarters) and the results submitted to the Department.

2. The water treatment plant shall maintain throughout the distribution system a minimum continuous and effective free chlorine residual of 0.2 mg/l or its equivalent. A minimum system pressure of 20 psi must be maintained throughout the system. Also, safety equipment shall be provided and located outside of chlorine room.

OR

The water treatment plant shall maintain throughout the distribution system a minimum combined chlorine residual of 0.6 mg/l or its equivalent. A minimum system pressure of 20 psi must be maintained throughout the system. Also, safety equipment shall be provided and located outside of chlorine room.

3. To address copper pipe corrosion control and potential black water issues, permittee shall collect at least one sample of raw water from each new well in accordance with F.A.C. Rule 62-555.315(5). The sample shall be analyzed for alkalinity, dissolved iron, dissolved oxygen (D.O.), pH, total sulfide, and turbidity, and the results shall be submitted to the Department.

Florida Department of Health Lee County

Environmental Engineering
60 Danley Drive, Unit 1, Fort Myers, FL 33907
PHONE: 239/274-2200 FAX: 239/274-2201

www.leechd.com
TWITTER: HealthyFLA
FACEBOOK: FLDepartmentofHealth
YOUTUBE: fldoh

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Clearance Requirements

1. The permittee must instruct the engineer of record to request system clearance from the Department within sixty (60) days of completion of construction, testing and disinfecting the system. Bacteriological test results shall be considered unacceptable if the test were completed more than 60 days before the Department received the results. [F.A.C. Rule 62-555.340(2)(c)]

Permitted construction or alteration of a public water system may not be placed into service until a letter of clearance has been issued by this Department. [F.A.C. Rule 62-555.345]

2. Prior to placing this project into service, Permittee shall submit, at a minimum, all of the following to the Department for evaluation and approval for operation, as provided in Rules 62-555.340 and 62-555.345, F.A.C.:

TREATMENT PLANT

- a. the engineer's *Certification of Construction Completion and Request for Clearance to Place Permitted PWS Components Into Operation* (DEP Form 62-555.900(9));
- b. certified record drawings, if there are any changes noted for the permitted project.
- c. copy of a satisfactory pressure test of the process piping performed in accordance with AWWA Standards. [F.A.C. Rule 62-555.320(21)(a)(1)]
- d. two consecutive days of satisfactory distribution bacteriological analytical results (see paragraph 3 below).

In order to facilitate the issuance of a letter of clearance, the Department requests that all of the above information be submitted as one package.

3. The new facilities shall be cleaned, disinfected, and bacteriologically cleared in accordance with Chapter 62-555, F.A.C. The bacteriological clearance data representative of the storage tank (two samples on consecutive days), the well discharge piping and distribution system (in accordance with the instructions for Bacteriological Sampling Locations shown below) and the untreated well water (two samples per day for 5 consecutive days collected at least six hours apart for each of the two wells) shall be submitted to the Department with the engineer's certification of construction completion. [Section 62-555.340 and 62-555.315(6)(b), F.A.C.]

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Bacteriological Sampling Locations: Copies of satisfactory bacteriological analyses taken from locations within the distribution system or water main extension to be cleared, in accordance with Rules 62-555.315 (6), 62-555.340 and 62-555.330, F.A.C. and American Water Works Association (AWWA) Standard C 651-92 as follows:

- The endpoint of the proposed addition;
- Any water lines branching off a main extension;
- Every 1,200 feet of water main;
- Each location shall be sampled on two separate days (at least 6 hours apart) with sample point locations and chlorine residual readings clearly indicated on the report and/or drawings.
- Bacteriological sample results will be considered unacceptable if the tests were completed more than 60 days before the Department receives the results.

Issued 24th of June, 2013.

A handwritten signature in black ink, appearing to read "Jerry W. Ma".

Jerry W. Ma, P.E.
Environmental Engineering

A handwritten signature in black ink, appearing to read "Judith Hartner".

Judith Hartner, M.D., M.P.H., M.P.A.
Director, Lee County Health Department



**SOUTH FLORIDA WATER MANAGEMENT DISTRICT
WATER USE INDIVIDUAL PERMIT**

APPLICATION NO: 190515-9

PERMIT NUMBER: 36-00208-W

DATE ISSUED: June 12, 2019

EXPIRATION DATE: June 12, 2039

PERMITTEE: TROST INTERNATIONAL I N C
25501 TROST BOULEVARD
BONITA SPRINGS, FL 34135

PROJECT NAME: CITRUS PARK

PROJECT LOCATION: Lee County, S18,19/T47S/R26E

PROJECT DESCRIPTION/AUTHORIZING:

The use of groundwater from the water table aquifer and Lower Tamiami aquifer for a public water supply for the Citrus Park service area serving 3,450 persons in the year 2039 with an average per capita use rate of 66 gallons per day and an annual allocation of 83.11 million gallons.

This is to notify you of South Florida Water Management District's (District) agency action concerning Permit Application Number 190515-9, received May 15, 2019. This action is taken pursuant to Chapter 373, Part II, Florida Statutes (F.S.), Rule 40E-1.603 and Chapter 40E-2, Florida Administrative Code (F.A.C.). Based on the information provided, District rules have been adhered to and a Water Use Individual Permit is in effect for this project subject to:

1. Not receiving a filed request for an administrative hearing pursuant to Section 120.57, F.S. and Section 120.569, F.S., or a request for a judicial review pursuant to Section 120.68, F.S.
2. The attached 32 permit conditions.
3. The attached 9 exhibits.

By acceptance and utilization of the water authorized under this permit, the Permittee agrees to hold and save the District and its successors harmless from any and all damages, claims or liabilities that may arise by reason of the construction, maintenance or use of activities authorized by this permit. Should you object to the permit, please refer to the attached "Notice of Rights" that addresses the procedures to be followed if you desire a public hearing or other review of the proposed agency action. Should you wish to object to the proposed agency action or file a petition or request, please provide written objections, petitions, requests and/or waivers to: Office of the District Clerk, South Florida Water Management District, 3301 Gun Club Road, West Palm Beach, FL 33406, or by email to clerk@sfwmd.gov.

CERTIFICATION OF SERVICE

I HEREBY CERTIFY THAT this written notice has been mailed or electronically transmitted to the Permittee (and the persons listed in the attached distribution list) this 12th day of June, 2019, in accordance with Section 120.60(3), F.S. Notice was also electronically posted on this date through a link on the home page of the District's website (my.sfwmd.gov/ePermitting).

BY: 

Simon Sunderland P.G.
Acting Bureau Chief
Water Use Bureau

SPECIAL PERMIT CONDITIONS

1. This permit is issued to:

TROST INTERNATIONAL I N C
25501 TROST BOULEVARD
BONITA SPRINGS, FL 34135

2. This permit shall expire on June 12, 2039.

3. Use classification is:

Public Water Supply

4. Source classification is:

Groundwater from:
Lower Tamiami Aquifer
Water Table Aquifer

5. Allocation:

Total annual allocation is 83.11 million gallons (MG). (227,699 GPD)

Total maximum monthly allocation is 10.18 million gallons (MG).

Allocation from a specific source (aquifer, waterbody, facility, or facility group):

Maximum annual allocation from Lower Tamiami Aquifer shall not exceed 66.50 million gallons (MG).

Maximum annual allocation from Water Table Aquifer shall not exceed 16.61 million gallons (MG).

Maximum monthly allocation from Lower Tamiami Aquifer shall not exceed 8.30 million gallons (MG).

Maximum monthly allocation from Water Table Aquifer shall not exceed 1.88 million gallons (MG).

These allocations represent the amount of water required to meet the water demands as a result of a rainfall deficit during a drought with the probability of recurring one year in ten. The Permittee shall not exceed these allocations in hydrologic conditions less than a 1-in-10 year drought event. Compliance with the annual allocation is based on the quantity withdrawn over a 12-month time period. Compliance with the maximum monthly allocation is based on the greatest quantity withdrawn in any single month. The annual allocation expressed in GPD or MGD is for informational purposes only.

If the rainfall deficit is more severe than that expected to recur once every ten years, the withdrawals shall not exceed that amount necessary to continue to meet the reasonable-beneficial demands under such conditions, provided no harm to the water resources occur and:

1. All other conditions of the permit are met; and

2. The withdrawal is otherwise consistent with applicable declared Water Shortage Orders in effect pursuant to Chapter 40E-21, F.A.C.

6. Withdrawal facilities:

Groundwater - Existing:

1 - 8" X 112' X 197 GPM Well Cased To 75 Feet

1 - 8" X 32' X 50 GPM Well Cased To 17 Feet

1 - 8" X 117' X 200 GPM Well Cased To 75 Feet

7. The Permittee shall submit all data as required by the implementation schedule for each of the permit conditions to: SFWMD at www.sfwmd.gov/ePermitting, or Regulatory Support, 3301 Gun Club Road, West Palm Beach, FL 33406.
8. The Permittee must submit the appropriate application form incorporated by reference in Rule 40E-2.101, F.A.C., to the District prior to the permit expiration date in order to continue the use of water.
9. The Permittee shall secure a well construction permit prior to construction, repair, or abandonment of all wells, as described in Chapter 40E-3, F.A.C.
10. Every five years from the date of last calibration, the Permittee shall submit re-calibration data for each withdrawal facility.
11. Prior to any withdrawals at the project, the Permittee shall provide the results of the calibration testing of the identified water accounting method(s) and equip all existing and proposed withdrawal facilities with approved water use accounting method(s) pursuant to Subsection 4.1.1 of the Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District.
12. Monthly withdrawals for each withdrawal facility shall be reported to the District semi-annually. The water accounting method and means of calibration shall be stated on each report.
13. The Permittee shall notify the District within 30 days of any change in service area boundary that results in a change in demand that affects its permitted allocation. The allocation shall be modified to effectuate such change.

14. The Permittee shall maintain an accurate flow meter at the intake of the water treatment plant for the purpose of measuring daily inflow of water.
15. If at any time there is an indication that the well casing, valves, or controls leak or have become inoperative, repairs or replacement shall be made to restore the system to an operating condition. Failure to make such repairs shall be cause for filling and abandoning the well, in accordance with procedures outlined in Chapter 40E-3, F.A.C.
16. The Standard Water Conservation Plan described in Subsection 2.3.2.F.1.a of the Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District and the Staff Report, must be implemented in accordance with the approved implementation schedule described in the following exhibit:
Exhibit 7
17. The Permittee shall notify the District within 30 days of entering into an inter-local agreement, contract, or other similar instrument to deliver or receive water outside of its service area or to serve a demand not identified to determine the allocation described in this permit. A copy of such agreement shall be provided to the District. The monthly volume of water delivered and/or received via each inter-local agreement, contract, or other similar instrument shall be submitted to the District at the same reporting frequency as the withdrawals for each withdrawal facility required in this permit.
18. The Permittee shall implement the wellfield operating plan submitted in support of the permit application, as described in the District staff report.
19. The Permittee shall determine unaccounted-for distribution system losses. Losses shall be determined for the entire distribution system on a monthly basis. Permittee shall define the manner in which unaccounted-for losses are calculated. Reports shall be submitted to the District on a yearly basis and are due by April 30th of each year.
20. The Permittee shall maintain an accurate flow meter at the point of discharge from the treatment plant for the purpose of measuring the daily flow of water.
21. Entities that control, either directly or indirectly, a wastewater treatment plant and/or reuse distribution system, and which have determined pursuant to Section 403.064, F.S., that use of reclaimed water is feasible, must provide the District with annual updates of the following information: (A) the status of distribution system construction, including location and capacity of lines; (B) a summary of uncommitted supplies for the next year; (C) copies of any new or amended local mandatory reclaimed water reuse zone ordinances; and (D) a list of end-users who have contracted to receive reclaimed water and the agreed upon quantity of water to be delivered.

STANDARD PERMIT CONDITIONS

1. All water uses authorized by this permit shall be implemented as conditioned by this permit, including any documents incorporated by reference in a permit condition. The District may revoke this permit, in whole or in part, or take enforcement action, pursuant to Section 373.136 or 373.243, F.S., unless a permit modification has been obtained to address the noncompliance.

The Permittee shall immediately notify the District in writing of any previously submitted material information that is later discovered to be inaccurate.

2. The Permittee is advised that this permit does not relieve any person from the requirement to obtain all necessary federal, state, local and special district authorizations.
3. The Permittee shall notify the District in writing within 30 days of any sale, transfer, or conveyance of ownership or any other loss of permitted legal control of the Project and/or related facilities from which the permitted consumptive use is made. Where Permittee's control of the land subject to the permit was demonstrated through a lease, the Permittee must either submit a new or modified lease showing that it continues to have legal control or documentation showing a transfer in control of the permitted system/project to the new landowner or new lessee. All transfers of ownership are subject to the requirements of Rule 40E-1.6107, F.A.C. Alternatively, the Permittee may surrender the consumptive use permit to the District, thereby relinquishing the right to conduct any activities under the permit.
4. Nothing in this permit should be construed to limit the authority of the District to declare a water shortage and issue orders pursuant to Chapter 373, F.S. In the event of a declared water shortage, the Permittee must adhere to the water shortage restrictions, as specified by the District. The Permittee is advised that during a water shortage, reports shall be submitted as required by District rule or order. The Permittee is advised that during a water shortage, pumpage, water levels, and water quality data shall be collected and submitted as required by District orders issued pursuant to Chapter 40E-21, F.A.C.
5. This permit does not convey to the Permittee any property rights or privileges other than those specified herein, nor relieve the permittee from complying with any applicable local government, state, or federal law, rule, or ordinance.
6. With advance notice to the Permittee, District staff with proper identification shall have permission to enter, inspect, observe, collect samples, and take measurements of permitted facilities to determine compliance with the permit conditions and permitted plans and specifications. The Permittee shall either accompany District staff onto the property or make provision for access onto the property.
7. A. The Permittee may seek modification of any term of an unexpired permit. The Permittee is advised that Section 373.239, F.S., and Rule 40E-2.331, F.A.C., are applicable to permit modifications.

B. The Permittee shall notify the District in writing 30 days prior to any changes to the project that

could potentially alter the reasonable demand reflected in the permitted allocation. Such changes include, but are not limited to, change in irrigated acreage, crop type, irrigation system, large users agreements, or water treatment method. Permittee will be required to apply for a modification of the permit for any changes in permitted allocation.

8. If any condition of the permit is violated, the permit shall be subject to review and modification, enforcement action, or revocation pursuant to Chapter 373, F.S.
9. The Permittee shall mitigate interference with existing legal uses that was caused in whole or in part by the Permittee's withdrawals, consistent with the approved mitigation plan. As necessary to offset the interference, mitigation will include pumpage reduction, replacement of the impacted individual's equipment, relocation of wells, change in withdrawal source, or other means.

Interference to an existing legal use is defined as an impact that occurs under hydrologic conditions equal to or less severe than a 1-in-10 year drought event that results in the:

A. Inability to withdraw water consistent with provisions of the permit, such as when remedial structural or operational actions not materially authorized by existing permits must be taken to address the interference; or

B. Change in the quality of water pursuant to primary State Drinking Water Standards to the extent that the water can no longer be used for its authorized purpose, or such change is imminent.

10. The Permittee shall mitigate harm to the natural resources caused by the Permittee's withdrawals, as determined through reference to the conditions for permit issuance. When harm occurs, or is imminent, the District will require the Permittee to modify withdrawal rates or mitigate the harm. Harm, as determined through reference to the conditions for permit issuance includes:

A. Reduction in ground or surface water levels that results in harmful lateral movement of the fresh water/salt water interface,

B. Reduction in water levels that harm the hydroperiod of wetlands,

C. Significant reduction in water levels or hydroperiod in a naturally occurring water body such as a lake or pond,

D. Harmful movement of contaminants in violation of state water quality standards, or

E. Harm to the natural system including damage to habitat for rare or endangered species.

11. The Permittee shall mitigate harm to existing off-site land uses caused by the Permittee's withdrawals, as determined through reference to the conditions for permit issuance. When harm occurs, or is imminent, the District will require the Permittee to modify withdrawal rates or mitigate the harm. Harm as determined through reference to the conditions for permit issuance, includes:

A. Significant reduction in water levels on the property to the extent that the designed function of the water body and related surface water management improvements are damaged, not including aesthetic values. The designed function of a water body is identified in the original permit or other governmental authorization issued for the construction of the water body. In cases where a permit was not required, the designed function shall be determined based on the purpose for the original construction of the water body (e.g. fill for construction, mining, drainage canal, etc.)

B. Damage to agriculture, including damage resulting from reduction in soil moisture resulting from consumptive use; or,

C. Land collapse or subsidence caused by reduction in water levels associated with consumptive use.

NOTICE OF RIGHTS

As required by Sections 120.569 and 120.60(3), Fla. Stat., the following is notice of the opportunities which may be available for administrative hearing or judicial review when the substantial interests of a party are determined by an agency. Please note that this Notice of Rights is not intended to provide legal advice. Not all of the legal proceedings detailed below may be an applicable or appropriate remedy. You may wish to consult an attorney regarding your legal rights.

RIGHT TO REQUEST ADMINISTRATIVE HEARING

A person whose substantial interests are or may be **affected by the South Florida Water Management District's** (SFWMD or District) action has the right to request an administrative hearing on that action pursuant to Sections 120.569 and 120.57, Fla. Stat. Persons seeking a hearing on a SFWMD decision which affects or may affect their substantial interests shall file a petition for hearing with the Office of the District Clerk of the SFWMD, in accordance with the filing instructions set forth herein, within 21 days of receipt of written notice of the decision, unless one of the following shorter time periods apply: (1) within 14 days of the notice of consolidated intent to grant or deny concurrently reviewed applications for environmental resource permits and use of sovereign submerged lands pursuant to Section 373.427, Fla. Stat.; or (2) within 14 days of service of an Administrative Order pursuant to Section 373.119(1), Fla. Stat. "Receipt of written notice of agency decision" means receipt of written notice through mail, electronic mail, or posting that the SFWMD has or intends to take final agency action, or publication of notice that the SFWMD has or intends to take final agency action. Any person who receives written notice of a SFWMD decision and fails to file a written request for hearing within the timeframe described above waives the right to request a hearing on that decision.

If the District takes final agency action which materially differs from the noticed intended agency decision, persons who may be substantially affected shall, unless otherwise provided by law, have an additional Rule 28-106.111, Fla. Admin. Code, point of entry.

Any person to whom an emergency order is directed pursuant to Section 373.119(2), Fla. Stat., shall comply therewith immediately, but on petition to the board shall be afforded a hearing as soon as possible.

A person may file a request for an extension of time for filing a petition. The SFWMD may, for good cause, grant the request. Requests for extension of time must be filed with the SFWMD prior to the deadline for filing a petition for hearing. Such requests for extension shall contain a certificate that the moving party has consulted with all other parties concerning the extension and that the SFWMD and any other parties agree to or oppose the extension. A timely request for an extension of time shall toll the running of the time period for filing a petition until the request is acted upon.

FILING INSTRUCTIONS

A petition for administrative hearing must be filed with the Office of the District Clerk of the SFWMD. Filings with the Office of the District Clerk may be made by mail, hand-delivery, or e-mail. Filings by facsimile will not be accepted. A petition for administrative hearing or other document is deemed filed upon receipt during normal business hours by the Office of the District Clerk at SFWMD headquarters in West Palm Beach, Florida. **The District's normal business hours are 8:00 a.m. – 5:00 p.m.,** excluding weekends and District holidays. Any document received by the Office of the District Clerk after 5:00 p.m. shall be deemed filed as of 8:00 a.m. on the next regular business day. Additional filing instructions are as follows:

- Filings by mail must be addressed to the Office of the District Clerk, 3301 Gun Club Road, West Palm Beach, Florida 33406.

- Filings by hand-delivery must be delivered to the Office of the District Clerk. Delivery of a petition to the SFWMD's security desk does not constitute filing. It will be necessary to request that the SFWMD's security officer contact the Office of the District Clerk. An employee of the SFWMD's Clerk's office will receive and file the petition.
- Filings by e-mail must be transmitted to the Office of the District Clerk at clerk@sfwmd.gov. The filing date for a document transmitted by electronic mail shall be the date the Office of the District Clerk receives the complete document. A party who files a document by e-mail shall (1) represent that the original physically signed document will be retained by that party for the duration of the proceeding and of any subsequent appeal or subsequent proceeding in that cause and that the party shall produce it upon the request of other parties; and (2) be responsible for any delay, disruption, or interruption of the electronic signals and accepts the full risk that the document may not be properly filed.

INITIATION OF AN ADMINISTRATIVE HEARING

Pursuant to Sections 120.54(5)(b)4. and 120.569(2)(c), Fla. Stat., and Rules 28-106.201 and 28-106.301, Fla. Admin. Code, initiation of an administrative hearing shall be made by written petition to the SFWMD in legible form and on 8 1/2 by 11 inch white paper. All petitions shall contain:

1. Identification of the action being contested, including the permit number, application number, SFWMD file number or any other SFWMD identification number, if known.
2. The name, address, any email address, any facsimile number, and telephone number of the petitioner and **petitioner's representative, if any.**
3. An explanation of how the **petitioner's substantial interests will be affected by the agency determination.**
4. A statement of when and how the petitioner received notice of the SFWMD's **decision.**
5. A statement of all disputed issues of material fact. If there are none, the petition must so indicate.
6. A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the SFWMD's **proposed action.**
7. A statement of the specific rules or statutes the petitioner contends require reversal or modification of the SFWMD's **proposed action.**
8. If disputed issues of material fact exist, the statement must also include an explanation of how the alleged facts relate to the specific rules or statutes.
9. A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the SFWMD to take with respect to the SFWMD's **proposed action.**

MEDIATION

The procedures for pursuing mediation are set forth in Section 120.573, Fla. Stat., and Rules 28-106.111 and 28-106.401–.405, Fla. Admin. Code. The SFWMD is not proposing mediation for this agency action under Section 120.573, Fla. Stat., at this time.

RIGHT TO SEEK JUDICIAL REVIEW

Pursuant to Section 120.68, Fla. Stat., and in accordance with Florida Rule of Appellate Procedure 9.110, a party who is adversely affected by final SFWMD action may seek judicial review of the SFWMD's final decision by filing a notice of appeal with the Office of the District Clerk of the SFWMD in accordance with the filing instructions set forth herein within 30 days of rendition of the order to be reviewed, and by filing a copy of the notice with the clerk of the appropriate district court of appeal.

WATER USE STAFF REPORT

Application Number: 190515-9
Permit Number: 36-00208-W
Project Name: CITRUS PARK
Water Use Permit Status: RENEWAL
Location: LEE COUNTY, S18,19/T47S/R26E
Applicant's Name and Address: TROST INTERNATIONAL I N C
25501 TROST BOULEVARD
BONITA SPRINGS, FL 34135

Water Use Classification: Public Water Supply

Sources:

Groundwater from: Lower Tamiami Aquifer
Water Table Aquifer

Authorized Allocation:

Annual Allocation: 83.11 Million Gallons (MG)
Maximum Monthly Allocation: 10.18 Million Gallons (MG)

Specific Source Limitations:	Annual(MG)	Monthly(MG)
Water Table Aquifer	16.61	1.88
Lower Tamiami Aquifer	66.5	8.3

Existing Withdrawal Facilities - Groundwater

Source: Lower Tamiami Aquifer
1 - 8" X 112' X 197 GPM Well Cased to 75 Feet
1 - 8" X 117' X 200 GPM Well Cased to 75 Feet
Source: Water Table Aquifer
1 - 8" X 32' X 50 GPM Well Cased to 17 Feet

<u>Rated Capacity Source</u>	<u>Status Code</u>	<u>GPM</u>	<u>MGM</u>	<u>MGY</u>
Lower Tamiami Aquifer	E	397	17.4	209
Water Table Aquifer	E	50	2.2	26
Totals:		447	19.6	235

PURPOSE

The purpose of this application is to renew Water Use Permit 36-00208-W for a public water supply, serving 3,450 persons in the year 2039 with an average per capita use rate of 66 gallons per day and a maximum monthly to average monthly pumping ratio 1.47-to-1. Withdrawals are from the water table aquifer (WTA) and Lower Tamiami aquifer (LTA).

PROJECT DESCRIPTION

Citrus Park (the Project) is an existing public water supply utility for a residential community consisting of recreational vehicle lots, mobile homes, recreational facilities, and single family homes, located approximately 0.7 miles east of the intersection of Imperial Parkway and Interstate 75 interchange, in southern Lee County (Exhibits 1 through 3). Withdrawals are from the WTA (primary source) and LTA (primary source) via three existing withdrawal facilities. Well specification data is shown on Exhibit 4.

Water Treatment and Wastewater Treatment/Distribution System Losses:

The Project operates a water treatment plant with a treatment capacity of 0.49 million gallons (MG) per day. Approximately 80% of the groundwater is from the LTA source and 20% from the WTA source. Half of the groundwater from the LTA is treated through a reverse osmosis (RO) treatment facility (0.1 MG per day capacity) to reduce the chloride concentration (Exhibit 5). The RO treated groundwater from the LTA (approximately 75% efficiency) is mixed with groundwater from the LTA (untreated) and WTA prior to treatment with a degassifier (to remove iron and hydrogen sulfide) to produce potable drinking water. The average distribution losses is estimated to be at approximately 8%. The Citrus Park Waste Water Treatment Facility is permitted under Florida Department of Environmental Protection Permit (FDEP) FLA-014477. The facility treats the wastewater with chlorination prior to discharging into the rapid infiltration basins, located 500 feet west of the wellfield, with a capacity of 0.2 MG per day, for aquifer recharge.

Permit History:

The Project was initially permitted on October 9, 1980 for the use of groundwater from the LTA for a public water supply. The permit was modified on March 14, 1991 to add the WTA source due to saline water intrusion. The water use permit was continually renewed since originally issued. This application for renewal was received timely without proposed allocation increases.

PROJECTED WATER USE DEMANDS

Public water supply demands were calculated in accordance with Subsection 2.3.1.F of the Applicant's Handbook (AH) for Water Use Permit Applications within the South Florida Water Management District (District). The Applicant identified the demand of all the required components and calculated the raw water demands based on historical/projected population and raw water pumpage from the WTA and LTA for the service area (Exhibit 5). Inclusive of the raw water demand is an 84% cumulative treatment efficiency (that includes an 8% distribution loss) utilizing reverse osmosis to treat approximately half of the groundwater from the LTA. Public water supply demands for Citrus Park will serve approximately 3,450 persons (full buildout population estimate)

PROJECTED WATER USE DEMANDS (CONTINUED)

in the year 2039 with an average per capita daily water use of 66 gallons and a maximum monthly to average monthly pumping ratio of 1.47-to-1. Water use from multiple primary sources shall each receive a separate allocation, the sum of which will not exceed the maximum monthly demand for the projected use (Subsection 2.2.1 of the AH). Therefore, the allocation from the LTA is 66.50 MG annually and 8.30 MG maximum month and the balance of demand supplied by the WTA is 16.61 MG annually and 1.88 MG maximum month. This results in a combined allocation of 10.18 MG maximum month and 83.11 MG annually as shown on Exhibit 6.

IMPACT EVALUATION

To ascertain that reasonable assurances were provided to support the conditions of permit issuance, historical pumpages and water elevation monitoring data at United States Geological Survey (USGS) monitor well L-2195 was reviewed and evaluated, pursuant to Subsection 3.1.1 of the AH. The review also consisted of collected rainfall data from the FPWX rainfall station (Exhibit 2). Staff has determined that the Project's permitted public water supply withdrawals have occurred during a 1-in-10 drought. Monitoring data is consistent with the criteria set forth in Subsection 3.1.1 of the AH.

WATER RESOURCE IMPACT EVALUATION

Water Resource Availability

Water Table Aquifer

Land surface elevation at the Project is approximately 15 feet National Geodetic Vertical Datum (NGVD). Information obtained from District Technical Publication WS-34 indicates that the base of the WTA is at an elevation of approximately -34 feet NGVD. USGS monitor well L-2195, located approximately 2.3 miles southeast of the Project (Exhibit 2), indicates that the most recent 1-in-10 year drought event water elevation, inclusive of the Project's withdrawals, is approximately 8 feet NGVD. This leaves an aquifer of saturated aquifer thickness of approximately 42 feet. This application is for the continuation of an existing, historical, permitted use of groundwater from the WTA with no change in source, demand, and no reported harm to the water resource availability. Therefore, the potential for harm to occur to water resource availability of the WTA as a result of the withdrawal of the recommended allocation is considered minimal.

Lower Tamiami Aquifer

As stated above, the land surface elevation at the Project is approximately 15 feet NGVD. Information obtained from District Technical Publication WS-34 indicates that the top of the LTA is at an elevation of approximately -65 feet NGVD in the vicinity of the Project; therefore, the maximum developable limit (MDL) occurs at -45 feet NGVD or 20 feet above the top of the aquifer. Data from the Project's monitor well MW-1, located near the Project's wellfield, indicates that the water elevation or potentiometric surface elevation (that includes the Project's historical withdrawals) during the most recent 1-in-10 year drought event for the LTA is approximately -8.0 feet NGVD. Therefore, the potentiometric surface has remained approximately 37 feet above the MDL. This application is for the continuation of an existing, historical, permitted use of

WATER RESOURCE IMPACT EVALUATION (CONTINUED)

groundwater from the LTA with no change in source, demand, and no reported harm to the water resource availability. Therefore, the potential for harm to occur to water resource availability of the LTA as a result of the withdrawal of the recommended allocation is considered minimal.

Existing Legal Users

Water Table Aquifer

The nearest existing legal user of the WTA is Stoneys Enterprises (Water Use Permit 36-01212-W) located on the eastern boundary of the Project (Exhibit 2). This application is for the continuation of an existing, historical, permitted use of water from the WTA with no change in source, demand, and no reported harm to existing legal users. Therefore, the potential for harm to occur to existing legal users of the LTA as a result of the withdrawal of the recommended allocation is considered minimal.

Lower Tamiami Aquifer

The nearest existing legal user of the LTA is the Bonita Springs Utilities (Water Use Permit 36-00008-W) with a wellfield located on the western boundary of the Project (Exhibit 2). This application is for the continuation of an existing, historical, permitted use of water from the LTA with no change in source, demand, and no reported harm to existing legal users. Therefore, the potential for harm to occur to existing legal users of the LTA as a result of the withdrawal of the recommended allocation is considered minimal.

Existing Off Site Land Uses

Water Table Aquifer

Land uses that are dependent upon water being on or near land surface and that existed prior to this application are protected from harm. The Project is located within agricultural and mining areas that surround the residential community (Exhibit 2). This application is for the continuation of an existing, historical, permitted use of water from the WTA with no change in source, demand, and no reported harm to existing offsite land uses. Therefore, pursuant to Subsection 3.6.2 of the AH, the use is not expected to result in significant reduction in water levels on the property of an existing offsite land use to the extent that: the designed function of a water body and related surface water management improvements are damaged (not including aesthetic values); or result in damage to agriculture, including damage resulting from reduction in soil moisture resulting from water use, or land collapse or subsidence caused by reduction in water levels associated with water use.

Lower Tamiami Aquifer

Land uses that are dependent upon water being on or near land surface and that existed prior to this application are protected from harm. The Project is located within agricultural and mining areas that surround the residential community (Exhibit 2). The LTA is separated from the WTA by the 32-foot thick Tamiami confining unit (District Technical Publication WS-34). This application is for the continuation of an existing, historical, permitted use of water from the LTA with no change in source, demand, and

WATER RESOURCE IMPACT EVALUATION (CONTINUED)

no reported harm to existing offsite land uses. Therefore, pursuant to Subsection 3.6.2 of the AH, the use is not expected to result in significant reduction in water levels on the property of an existing offsite land use to the extent that: the designed function of a water body and related surface water management improvements are damaged (not including aesthetic values); or result in damage to agriculture, including damage resulting from reduction in soil moisture resulting from water use, or land collapse or subsidence caused by reduction in water levels associated with water use.

Migration of Saline Water

Water Table Aquifer

The nearest source of saline surface water is the Imperial River, located approximately 1.7 miles south of the Project (Exhibit 2). The nearest source of saline groundwater within the WTA, the saltwater interface, is located 1.6 miles south of the Project toward the Imperial River (District's Adaption To Sea Level Rise Project, 2014). The WTA is separated from deeper sources of saline water of the Mid-Hawthorn aquifer and the Floridan aquifer system by the Mid-Hawthorn confining layer (168 feet thick) and the Lower Hawthorn confining layer (212 feet thick), respectively (District Technical Publication WS-34). In addition, this application is for the continuation of an existing, historical, permitted use of water from the WTA with no change in source, demand, and no reported harm involving the migration of saline water. Therefore, the potential for saline water intrusion or upconing to occur as a result of the withdrawal of the recommended allocation is considered minimal.

Lower Tamiami Aquifer

As stated above, the nearest source of saline surface water is the Imperial River, located approximately 1.7 miles south of the Project (Exhibit 2). The LTA is separated from the WTA by the 32-foot thick Tamiami confining unit (District Technical Publication WS-34). Data from the Project's monitor well MW-1 for the LTA, located near the Project's wellfield, indicates that the chloride concentration during the most recent 1-in-10 year drought event is approximately 350 milligrams per liter (mg/L). The LTA is separated from deeper sources of saline water of the Mid-Hawthorn aquifer and the Floridan aquifer system by the Mid-Hawthorn confining layer (168 feet thick) and the Lower Hawthorn confining layer (212 feet thick), respectively (District Technical Publication WS-34). Since the District encourages the use of the lowest water quality for the use intended, saline groundwater may be used for a public water supply (Subsection 2.2.3 of the AH). As stated previously, approximately half of the groundwater from the LTA is treated through a RO treatment facility, which is mixed with the untreated groundwater from the LTA and WTA. In addition, this application is for the continuation of an existing, historical, permitted use of water from the LTA with no change in source, demand, and no reported harm involving the migration of saline water. Therefore, the potential for saline water intrusion or upconing to occur as a result of the withdrawal of the recommended allocation is considered minimal.

WATER RESOURCE IMPACT EVALUATION (CONTINUED)

Wetland Environments

Water Table Aquifer

Pursuant to the Environmental Resource Permit (ERP) 36-00093-S, there are no on-site wetlands. The original ERP for the Project was issued in 1980. There are off-site wetlands immediately adjacent to the north and northeast of the Project. The off-site wetlands are within Lee County's Conservation 20/20 Lands, which are contiguous to District owned lands (Flint Pen Strand). The off-site wetlands can generally be described as cypress, pine-cypress, wet prairie, and freshwater marsh with varying degrees of exotic vegetation. No harm to the off-site wetlands has been documented as a result of the historical water use. This application is for the continuation of a historical, permitted use of water with no changes to source or allocation. Based on the above information and application of the narrative standard, the potential for harm to occur to the off-site wetlands as a result of the withdrawal of the recommended allocation is considered minimal.

Lower Tamiami Aquifer

As mentioned above, the Project does not contain on-site wetlands, but off-site wetlands are immediately adjacent to the Project's northern and northeastern boundary. The LTA is hydraulically separated from the WTA by a confining layer. Based on the above information and application of the narrative standard, the potential for harm to occur to the off-site wetlands as a result of the withdrawal of the recommended allocation is considered minimal.

Sources of Pollution

Water Table Aquifer

The nearest existing potential source of pollution is the solid waste facility called the Bonita Grande Sand Company (FDEP Facility ID 95094) located 1.3 miles southeast of the nearest Project's withdrawal facilities. The facility operated as an unauthorized yard trash processing facility that received vegetation debris until 2004 when the FDEP forced the closure and cleanup of the facility. The site has been undergoing cleanup that continues to the present by deconstructing the debris and then either properly disposing or recycling the debris. This application is for the continuation of an existing, historical, permitted use of water from the WTA with no change in source, demand, and no reported harm involving the migration of pollution. Therefore, the potential for movement of contaminants, if present, from known pollution sources as a result of the withdrawal of the recommended allocation is considered minimal.

Lower Tamiami Aquifer

As stated above, the nearest existing potential source of pollution is the solid waste facility called the Bonita Grande Sand Company (FDEP Facility ID 95094) located 1.3 miles southeast of the nearest Project's withdrawal facilities. The LTA is separated from the WTA by the 32-foot thick Tamiami confining unit (District Technical Publication WS-34). In addition, this application is for the continuation of an existing, historical, permitted use of water from the LTA with no change in source, demand, and no reported harm involving the migration of pollution. Therefore, the potential for

WATER RESOURCE IMPACT EVALUATION (CONTINUED)

movement of contaminants, if present, from known or reported pollution sources as a result of the withdrawal of the recommended allocation is considered minimal.

ADDITIONAL INFORMATION

Regional Issues

Maximum Developable Limits

The LTA has an MDL set at 20 feet above the uppermost strata of the aquifer. Subsection 3.9.3 of the AH states that the water level shall not drop below the MDL during a 1-in-10 drought condition. As stated above in the Water Resource Availability section of this staff report, based on the impact evaluation, withdrawal of the recommended allocation for this water use permit does not impact the MDL for the LTA in the vicinity of the Project.

Project Site Issues

Legal Control and Land Use

Records from the Lee County property appraiser website indicates that the Permittee maintains legal control over the Project site. All withdrawal facilities are located within the Project boundaries. The water allocation requested for a public water supply is compatible with the land use category at this site (Subsection 2.1 of the AH).

Water Conservation Plan

The Permittee has implemented the elements of the Standard Water Conservation Plan as required by Subsection 2.3.2.F.1.a of the AH (Exhibit 7). Florida-Friendly landscape principles are encouraged and employed in common areas. Ultra-low volume plumbing is required for replacement of obsolete fixtures and new construction. Utility staff continually monitors for leaks and conducts regular inspections. A water conservation public education program is provided by sending water conservation information to residents via billing statements and postings in common building areas.

Potential Use of Reclaimed Water

The Citrus Park Waste Water Treatment Facility has the capacity to treat and dispose of approximately 0.2 MG per day of treated water for aquifer recharge.

Permit Duration

Pursuant to Subsection 1.5.2.C.3 of the AH, the demand is consistent with Rule 40E-2 of the Florida Administrative Code and the Permittee has demonstrated the need for the use of the recommended allocations for 20 years. Therefore, staff recommends a water use permit duration of 20 years.

ENVIRONMENTAL RESOURCE PERMIT STATUS:

Not Applicable

RIGHT OF WAY PERMIT STATUS:

Not Applicable

RECOMMENDATIONS

Project Name: CITRUS PARK

Application Number: 190515-9

Permit Number: 36-00208-W

RECOMMENDATION


The use of groundwater from the water table aquifer and Lower Tamiami aquifer for a public water supply for the Citrus Park service area serving 3,450 persons in the year 2039 with an average per capita use rate of 66 gallons per day and an annual allocation of 83.11 million gallons.

STAFF EVALUATION

REVIEWER:

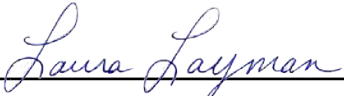


Matt Brosious, NRM



Vincent Migliore, P.G., WU

SUPERVISOR:

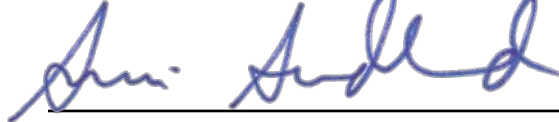


Laura Layman, NRM



Alberto J. Naya, P.G., WU

WATER USE ACTING BUREAU CHIEF:



Simon Sunderland, P.G.

Date: June 12, 2019

SPECIAL PERMIT CONDITIONS

1. This permit is issued to:

TROST INTERNATIONAL I N C
25501 TROST BOULEVARD
BONITA SPRINGS, FL 34135

2. This permit shall expire on June 12, 2039.

3. Use classification is:

Public Water Supply

4. Source classification is:

Groundwater from:
Lower Tamiami Aquifer
Water Table Aquifer

5. Allocation:

Total annual allocation is 83.11 million gallons (MG). (227,699 GPD)

Total maximum monthly allocation is 10.18 million gallons (MG).

Allocation from a specific source (aquifer, waterbody, facility, or facility group):

Maximum annual allocation from Lower Tamiami Aquifer shall not exceed 66.50 million gallons (MG). (182,192 GPD).

Maximum annual allocation from Water Table Aquifer shall not exceed 16.61 million gallons (MG). (45,507 GPD).

Maximum monthly allocation from Lower Tamiami Aquifer shall not exceed 8.30 million gallons (MG).

Maximum monthly allocation from Water Table Aquifer shall not exceed 1.88 million gallons (MG).

These allocations represent the amount of water required to meet the water demands as a result of a rainfall deficit during a drought with the probability of recurring one year in ten. The Permittee shall not exceed these allocations in hydrologic conditions less than a 1-in-10 year drought event. Compliance with the annual allocation is based on the quantity withdrawn over a 12-month time period. Compliance with the maximum

SPECIAL PERMIT CONDITIONS

monthly allocation is based on the greatest quantity withdrawn in any single month. The annual allocation expressed in GPD or MGD is for informational purposes only.

If the rainfall deficit is more severe than that expected to recur once every ten years, the withdrawals shall not exceed that amount necessary to continue to meet the reasonable-beneficial demands under such conditions, provided no harm to the water resources occur and:

1. All other conditions of the permit are met; and
2. The withdrawal is otherwise consistent with applicable declared Water Shortage Orders in effect pursuant to Chapter 40E-21, F.A.C.

6. Withdrawal facilities:

Groundwater - Existing:

- 1 - 8" X 112' X 197 GPM Well Cased To 75 Feet
- 1 - 8" X 32' X 50 GPM Well Cased To 17 Feet
- 1 - 8" X 117' X 200 GPM Well Cased To 75 Feet

7. The Permittee shall submit all data as required by the implementation schedule for each of the permit conditions to: SFWMD at www.sfwmd.gov/ePermitting, or Regulatory Support, 3301 Gun Club Road, West Palm Beach, FL 33406.
8. The Permittee must submit the appropriate application form incorporated by reference in Rule 40E-2.101, F.A.C., to the District prior to the permit expiration date in order to continue the use of water.
9. The Permittee shall secure a well construction permit prior to construction, repair, or abandonment of all wells, as described in Chapter 40E-3, F.A.C.
10. Every five years from the date of last calibration, the Permittee shall submit re-calibration data for each withdrawal facility.
11. Prior to any withdrawals at the project, the Permittee shall provide the results of the calibration testing of the identified water accounting method(s) and equip all existing and proposed withdrawal facilities with approved water use accounting method(s) pursuant to Subsection 4.1.1 of the Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District.
12. Monthly withdrawals for each withdrawal facility shall be reported to the District semi-

SPECIAL PERMIT CONDITIONS

annually. The water accounting method and means of calibration shall be stated on each report.

13. The Permittee shall notify the District within 30 days of any change in service area boundary that results in a change in demand that affects its permitted allocation. The allocation shall be modified to effectuate such change.
14. The Permittee shall maintain an accurate flow meter at the intake of the water treatment plant for the purpose of measuring daily inflow of water.
15. If at any time there is an indication that the well casing, valves, or controls leak or have become inoperative, repairs or replacement shall be made to restore the system to an operating condition. Failure to make such repairs shall be cause for filling and abandoning the well, in accordance with procedures outlined in Chapter 40E-3, F.A.C.
16. The Standard Water Conservation Plan described in Subsection 2.3.2.F.1.a of the Applicant's Handbook for Water Use Permit Applications within the South Florida Water Management District and the Staff Report, must be implemented in accordance with the approved implementation schedule described in the following exhibit:
Exhibit 7
17. The Permittee shall notify the District within 30 days of entering into an inter-local agreement, contract, or other similar instrument to deliver or receive water outside of its service area or to serve a demand not identified to determine the allocation described in this permit. A copy of such agreement shall be provided to the District. The monthly volume of water delivered and/or received via each inter-local agreement, contract, or other similar instrument shall be submitted to the District at the same reporting frequency as the withdrawals for each withdrawal facility required in this permit.
18. The Permittee shall implement the wellfield operating plan submitted in support of the permit application, as described in the District staff report.
19. The Permittee shall determine unaccounted-for distribution system losses. Losses shall be determined for the entire distribution system on a monthly basis. Permittee shall define the manner in which unaccounted-for losses are calculated. Reports shall be submitted to the District on a yearly basis and are due by April 30th of each year.
20. The Permittee shall maintain an accurate flow meter at the point of discharge from the treatment plant for the purpose of measuring the daily flow of water.
21. Entities that control, either directly or indirectly, a wastewater treatment plant and/or

SPECIAL PERMIT CONDITIONS

reuse distribution system, and which have determined pursuant to Section 403.064, F.S., that use of reclaimed water is feasible, must provide the District with annual updates of the following information: (A) the status of distribution system construction, including location and capacity of lines; (B) a summary of uncommitted supplies for the next year; (C) copies of any new or amended local mandatory reclaimed water reuse zone ordinances; and (D) a list of end-users who have contracted to receive reclaimed water and the agreed upon quantity of water to be delivered.

STANDARD PERMIT CONDITIONS

1. All water uses authorized by this permit shall be implemented as conditioned by this permit, including any documents incorporated by reference in a permit condition. The District may revoke this permit, in whole or in part, or take enforcement action, pursuant to Section 373.136 or 373.243, F.S., unless a permit modification has been obtained to address the noncompliance.

The Permittee shall immediately notify the District in writing of any previously submitted material information that is later discovered to be inaccurate.

2. The Permittee is advised that this permit does not relieve any person from the requirement to obtain all necessary federal, state, local and special district authorizations.
3. The Permittee shall notify the District in writing within 30 days of any sale, transfer, or conveyance of ownership or any other loss of permitted legal control of the Project and/or related facilities from which the permitted consumptive use is made. Where Permittee's control of the land subject to the permit was demonstrated through a lease, the Permittee must either submit a new or modified lease showing that it continues to have legal control or documentation showing a transfer in control of the permitted system/project to the new landowner or new lessee. All transfers of ownership are subject to the requirements of Rule 40E-1.6107, F.A.C. Alternatively, the Permittee may surrender the consumptive use permit to the District, thereby relinquishing the right to conduct any activities under the permit.
4. Nothing in this permit should be construed to limit the authority of the District to declare a water shortage and issue orders pursuant to Chapter 373, F.S. In the event of a declared water shortage, the Permittee must adhere to the water shortage restrictions, as specified by the District. The Permittee is advised that during a water shortage, reports shall be submitted as required by District rule or order. The Permittee is advised that during a water shortage, pumpage, water levels, and water quality data shall be collected and submitted as required by District orders issued pursuant to Chapter 40E-21, F.A.C.
5. This permit does not convey to the Permittee any property rights or privileges other than those specified herein, nor relieve the permittee from complying with any applicable local government, state, or federal law, rule, or ordinance.
6. With advance notice to the Permittee, District staff with proper identification shall have permission to enter, inspect, observe, collect samples, and take measurements of permitted facilities to determine compliance with the permit conditions and permitted plans and specifications. The Permittee shall either accompany District staff onto the property or make provision for access onto the property.

7. A. The Permittee may seek modification of any term of an unexpired permit. The Permittee is advised that Section 373.239, F.S., and Rule 40E-2.331, F.A.C., are applicable to permit modifications.

B. The Permittee shall notify the District in writing 30 days prior to any changes to the project that could potentially alter the reasonable demand reflected in the permitted allocation. Such changes include, but are not limited to, change in irrigated acreage, crop type, irrigation system, large users agreements, or water treatment method. Permittee will be required to apply for a modification of the permit for any changes in permitted allocation.

8. If any condition of the permit is violated, the permit shall be subject to review and modification, enforcement action, or revocation pursuant to Chapter 373, F.S.

9. The Permittee shall mitigate interference with existing legal uses that was caused in whole or in part by the Permittee's withdrawals, consistent with the approved mitigation plan. As necessary to offset the interference, mitigation will include pumpage reduction, replacement of the impacted individual's equipment, relocation of wells, change in withdrawal source, or other means.

Interference to an existing legal use is defined as an impact that occurs under hydrologic conditions equal to or less severe than a 1-in-10 year drought event that results in the:

A. Inability to withdraw water consistent with provisions of the permit, such as when remedial structural or operational actions not materially authorized by existing permits must be taken to address the interference; or

B. Change in the quality of water pursuant to primary State Drinking Water Standards to the extent that the water can no longer be used for its authorized purpose, or such change is imminent.

10. The Permittee shall mitigate harm to the natural resources caused by the Permittee's withdrawals, as determined through reference to the conditions for permit issuance. When harm occurs, or is imminent, the District will require the Permittee to modify withdrawal rates or mitigate the harm. Harm, as determined through reference to the conditions for permit issuance includes:

A. Reduction in ground or surface water levels that results in harmful lateral movement of the fresh water/salt water interface,

B. Reduction in water levels that harm the hydroperiod of wetlands,

C. Significant reduction in water levels or hydroperiod in a naturally occurring water body such as a lake or pond,

D. Harmful movement of contaminants in violation of state water quality standards, or

E. Harm to the natural system including damage to habitat for rare or endangered species.

11. The Permittee shall mitigate harm to existing off-site land uses caused by the Permittee's withdrawals, as determined through reference to the conditions for permit issuance. When harm occurs, or is imminent, the District will require the Permittee to modify withdrawal rates or mitigate the harm. Harm as determined through reference to the conditions for permit issuance, includes:

A. Significant reduction in water levels on the property to the extent that the designed function of the water body and related surface water management improvements are damaged, not including aesthetic values. The designed function of a water body is identified in the original permit or other governmental authorization issued for the construction of the water body. In cases where a permit was not required, the designed function shall be determined based on the purpose for the original construction of the water body (e.g. fill for construction, mining, drainage canal, etc.)

B. Damage to agriculture, including damage resulting from reduction in soil moisture resulting from consumptive use; or,

C. Land collapse or subsidence caused by reduction in water levels associated with consumptive use.

R 21

R 22

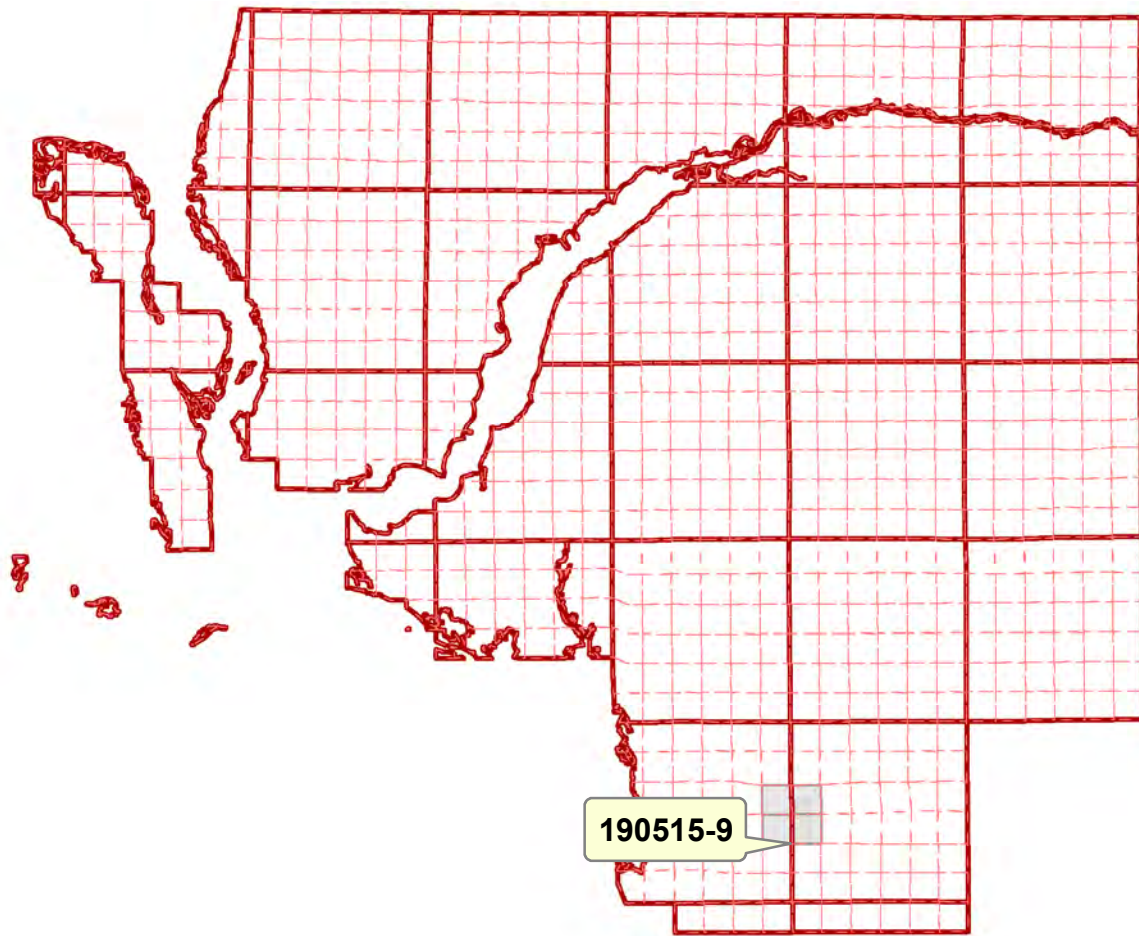
R 23

R 24

R 25

R 26

R 27



T 43

T 44

T 45

T 46

T 47

T 48

190515-9



LEE COUNTY, FLORIDA

Application No: 190515-9

Permit No: 36-00208-W

Sec 18,19 / Twp 47 / Rge 26

Project Name: CITRUS PARK

N



Map Date: 2019-06-03

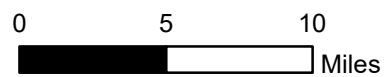
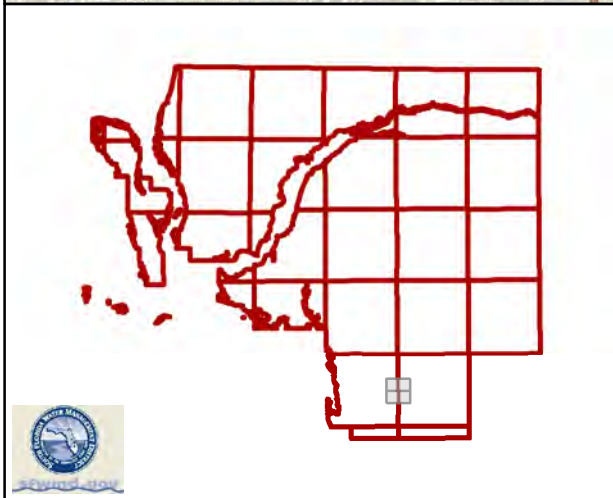
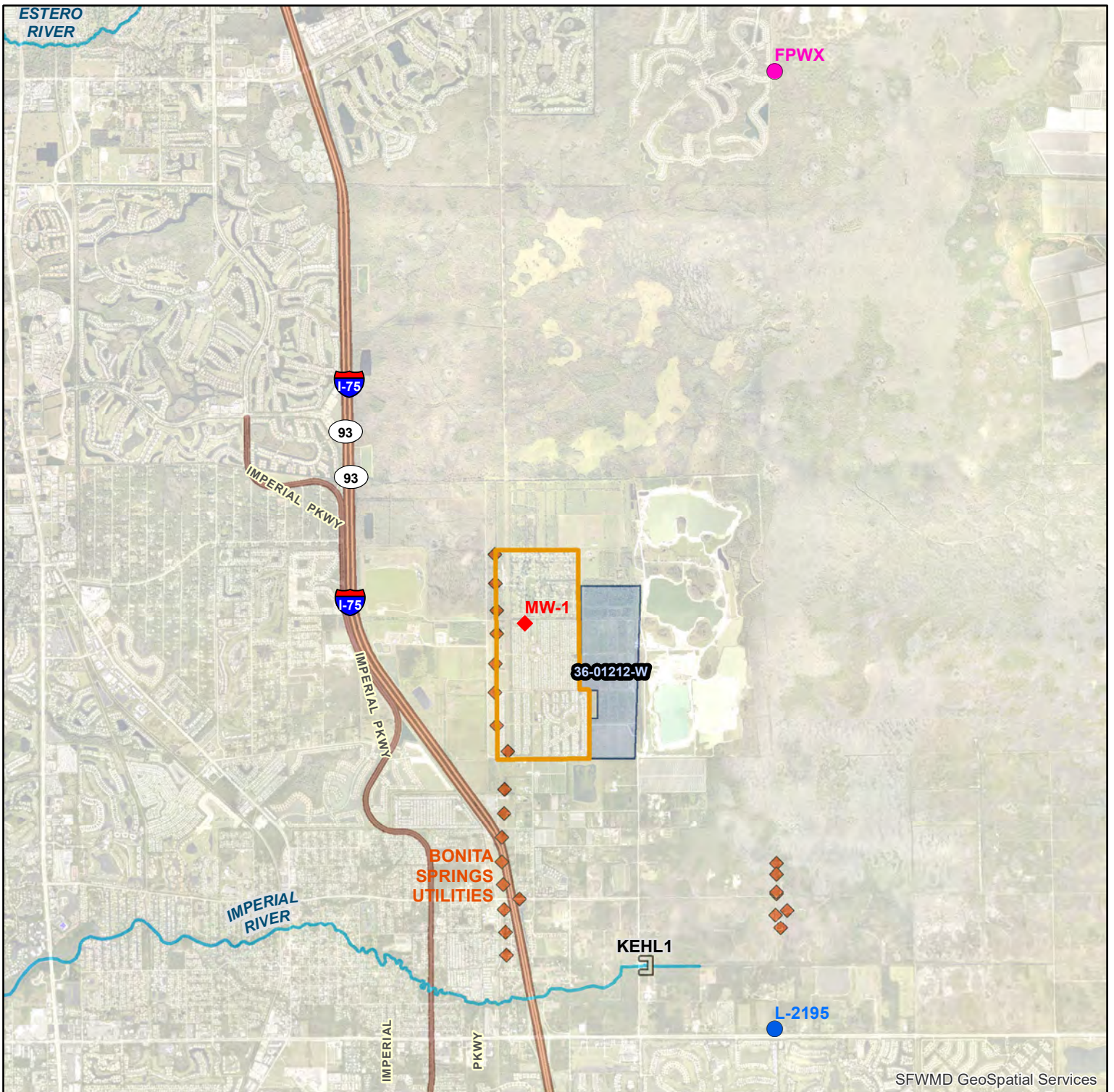


Exhibit No: 1



LEE COUNTY, FLORIDA

◆ WELL

▭ Application

Application No: 190515-9

Sec 18,19 / Twp 47 / Rge 26

Project Name: CITRUS PARK

N



Map Date: 2019-05-23

Permit No: 36-00208-W

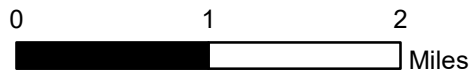
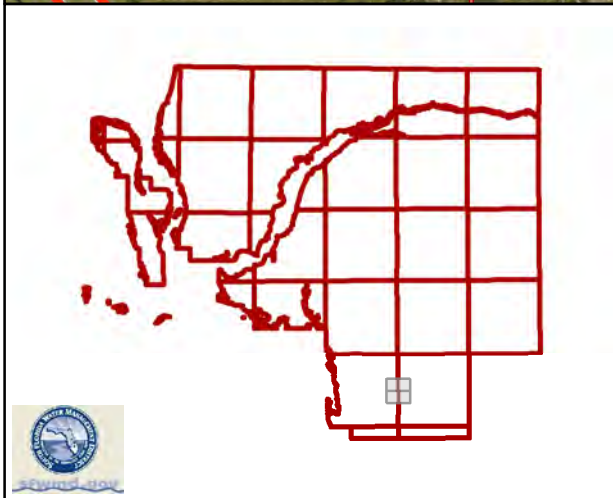


Exhibit No: 2





SFWMD GeoSpatial Services



LEE COUNTY, FLORIDA

 Application

 WELL

Application No: 190515-9

Sec 18,19 / Twp 47 / Rge 26

Project Name: CITRUS PARK

N



Map Date: 2019-06-03

Permit No: 36-00208-W

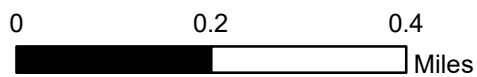


Exhibit No: 3



TABLE - A
Description Of Wells.

Application Number: 190515-9

Well ID	21395	21396	21411	151692
Name	W-1	W-2	W-3	MW-1
Map Designator	W-1	W-2	W-3	MW-1
FLUWID Number				
Well Field				
Existing/Proposed	E	E	E	E
Well Diameter(Inches)	8	8	8	2
Total Depth(feet)	117	112	32	105
Cased Depth(feet)	75	75	17	85
Facility Elev. (ft. NGVD)				
Screened Interval				
From				
To				
Pumped Or Flowing	P	P	P	
Pump Type	Submersible	Submersible	Submersible	None
Pump Int. Elev. Feet (NGVD)				
Feet (BLS)				
Pump Capacity(GPM)	200	197	50	0
Year Drilled	1989	1989	1989	
Planar Location				
Source				
Feet East	409949	409949.899	409940	409954
Feet North	742598	742579.699	742595	742593
Accounting Method	Flow Meter	Flow Meter	Flow Meter	None
Use Status	Primary	Primary	Primary	Monitor
Water Use Type	Public Water Supply	Public Water Supply	Public Water Supply	Monitor
Aquifer	Lower Tamiami Aquifer	Lower Tamiami Aquifer	Water Table Aquifer	Lower Tamiami Aquifer

Wellfield Operating Schedule

Pumpage should be rotated between the two primary wells on a weekly basis to reduce individual well dependence and to equalize usage. The surficial aquifer well should operate for the same duration as the primary wells with a portion of the primary well flow and all of the surficial well flow designed to bypass the reverse osmosis system but enter the degasifier, transfer tank and pumping system. The surficial aquifer pump will be replaced with a smaller capacity pump capable of producing approximately 50 GPM to insure that the blended water continues to meet FDEP requirements for potable water. Water from both the surficial and the lower tamiami aquifer is potable but dissolved iron concentrations in the surficial aquifer well would damage the reverse osmosis membranes so it must be blended after the reverse osmosis system and prior to the degasifier. The water treatment process includes forced draft aeration which will reduce the iron concentration in the water from the surficial aquifer as well as the hydrogen sulfide present in the water from the lower tamiami aquifer wells. The operation is meant to improve water quality and reduce dependence on a single source of water by blending of the surficial aquifer water with the reverse osmosis product and bypassed lower tamiami aquifer water within the treatment system. Care should be taken to ensure that the water usage meets all mandated permit limitations.

Estimated Monthly Allocation Per Aquifer Based on Previous Data

Well Designation	Aquifer	Well Status	Pump Operating Schedule
PW-1	Lower Tamiami	Primary	One week at design rate of 200 GPM, then switch to PW-2.
PW-2	Lower Tamiami	Primary	One week at design rate of 197 GPM, then switch to PW-1.
PW-3	Water Table (Surficial)	Primary	Operate concurrently with well PW-1 and PW-2 at the reduced design rate of 50 GPM.

Well operation will consist of the following allocations:

Well PW-1 or PW-2 normal operation at approximately 200 GPM of which 93 GPM is used to feed to the reverse osmosis system and 107 GPM is bypassed to the degasifier system. The reverse osmosis product flow of 70 GPM is to the degasifier and 23 GPM of concentrate is discharged to the sanitary sewer. During peak flow periods, the second nominal 200 GPM well will also run but both wells will be limited to 160 GPM each This will allow operation of the wellfield to produce the highest quality water for the customers. Well PW-3 will be operating concurrently with the reduced 50 GPM flow bypassed directly to the degasifier system.

Total flows:

281 GPM to the degasifier and 23 GPM to sewer system during **normal operation** with flow below 400,000 GPD.

350 GPM to the degasifier and 23 GPM to sewer system during **peak operation** with flow above 400,000 GPD.

A flow diagram of the proposed system is attached.

Note: Operating hours per day are dependent on daily demands.

Month	Total Demand Year 2024	Water Table Aquifer Pumpage (MG)	Lower Tamiami Aquifer Pumpage (MG)
Jan	9.8	2.3	7.5
Feb	9.7	2.3	7.4
Mar	10.9	2.6	8.3
Apr	8.4	2.0	6.4
May	6.2	1.2	5.0
Jun	5.2	0.8	4.4
Jul	4.4	0.5	3.9
Aug	4.3	0.5	3.8
Sep	4.4	0.5	3.9
Oct	5.6	1.0	4.6
Nov	7.0	1.4	5.6
Dec	7.1	1.5	5.6
Total:	83.0	16.6	66.4

Summary Of Water Use Demands & Recommended Allocation Components

Application Number: 190515-9

Public Water Supply

Recommended Allocation (MGD): 0.2277 Recommended Maximum Month Withdrawals (MGM): 10.1755

Description	Population	Rec. PCUR	----- Recommended Demands--			Delivery System Efficiency	-----Recommended Alloca	
			<u>Avg. Daily MGD</u>	<u>Peak Factor</u>	<u>Max Monthly MGM</u>		<u>Daily MGD</u>	<u>Max. Monthly MGM</u>
Citrus Park utilities franchise area	3,450	66	0.2277	1.47	10.1755	100%	0.2277	10.1755

Water conservation plan For Citrus Park Utility

The Citrus Park utility system serves a somewhat unique mixture of recreational vehicle sites, mobile homes and single family homes, none of which are individually metered. Occupancy is largely seasonal for most of the recreational vehicles and mobile homes. There are seasonal rental units and owned units in the mixture so this water conservation plan has been prepared to address the mixed use.

The water conservation measures generally comply with applicable sections listed in Subsection 2.3.2.F.1.a of the Applicant's Handbook. The primary method of water conservation is education of the residents, owners and renters served by the utility. They consist of:

1. Water conservation information posted in common building areas.
2. Water conservation information provided to new owners.
3. Water conservation statement on quarterly billings.
4. Prohibition of in ground irrigation systems except in the single family subdivision which requires use of their stormwater lake if an irrigation system is constructed.

Some potential examples of educational information are attached to this plan.

Inside

- **Check faucets and pipes for leaks.** A small drip from a worn faucet washer can waste 20 gallons of water per day; larger leaks can waste hundreds of gallons.
- **Use your dishwasher and washing machine only for full loads.** When possible, avoid washing during heavy downpours.
- **Minimize use of kitchen sink garbage disposal units.** The units require a lot of water to operate properly and also add to the volume of solids in a septic tank, which can lead to maintenance problems. Instead of using a garbage disposal, compost kitchen scraps and use the nutrient-rich compost to enhance yard or garden soil.

Outside

- **Add mulch to reduce evaporation.** Mulching reduces water needed in a garden by as much as 50 percent. It also has the added benefit of preventing weed growth, deterring pests, stabilizing soil temperature, and, as it decomposes, providing nutrients to the soil.
- **Harvest rain** to water flower beds, herb gardens and potted plants. Rain is free, and it's beneficial for plants because rain does not contain hard minerals.
- **Choose native plants** that are adapted to the area and need less water.
- **Check hose and faucet connections for leaks** – a drop wasted each second can add up to a couple of gallons each day.
- **Do not water the lawn or plants in, or shortly after, rainy weather.**



Florida Geological Survey

PROTECT OUR RESOURCES... FOR GENERATIONS TO COME

Florida attracts visitors and residents alike. We all enjoy the recreational opportunities afforded by springs, beaches, rivers, forests, and prairies. And the state is a gardener's paradise, offering nearly twelve months of horticultural productivity.

But Florida's rapid population growth presents challenges. Loss of wildlife habitat, water pollution, and the increasing demand placed on a limited water supply threaten the natural resources that brought us here.

Now, more than ever, it is time to make choices that protect the health and beauty of Florida. Those choices start right in your home landscape.

Florida's springs (pictured above) offer wildlife habitat and recreational opportunity, but they are increasingly threatened by pollution. Florida-Friendly Landscaping™ practices help protect Florida's water resources from contamination.

Swales (dips) and berms (rises) help slow the runoff of stormwater from a landscape. The water percolates through the soil and is filtered by turfgrass before it reaches the underground reservoir called the aquifer. Porous pavers (pictured right), like mulch and crushed shell, also allow runoff to seep into the earth instead of carrying debris into nearby water bodies.



Audrey Dorr

CITRUS PARK

To learn more about creating and maintaining attractive landscapes that protect Florida's water resources and environment, contact your county Extension office.



Rain barrels may be visually unobtrusive and screened, or even painted to match the house.

Or contact the FFL State office at:

(352) 273-4518

<http://fyn.ifas.ufl.edu>

E-mail: fyn@ifas.ufl.edu

The Cooperative Extension Service is a partnership between the University of Florida and your local county government.



Angela Maraj

FIND OUT HOW TO CONVERT YOUR YARD TO A FLORIDA-FRIENDLY LANDSCAPE TODAY!

Visit Publications at: <http://fyn.ifas.ufl.edu>



3



Create a Florida-Friendly Yard



Neta Villalobos-Bell

Florida-Friendly
Landscaping™ PROGRAM
Solutions for Your Yard

EXHIBIT 7

OUR YARDS AND COMMUNITY LANDSCAPES

The first line of defense.

Every year, thousands of Floridians turn to their county's UF/IFAS Extension office for advice from trained horticultural staff and master gardener volunteers. UF/IFAS Extension can teach you to design and maintain an attractive home landscape that uses minimal water, fertilizer, and pesticides.



Carrie Stevenson

Florida Yards & Neighborhoods (FYN) is a public education and outreach program for homeowners. As part of the Florida-Friendly Landscaping™ (FFL) Program, it is offered statewide through most UF/IFAS Extension offices.

Help is just a phone call away and your county Extension office is a wealth of information. Signage at the Citrus County Extension office (pictured below) teaches visitors about the nine Florida-Friendly Landscaping™ principles.

Contact your county Extension office at <http://solutionsforyourlife.ifas.ufl.edu/map/> to find a schedule of FFL workshops. Learn how to build a compost bin, build and install a rain barrel (pictured above), plant a vegetable garden, calibrate your sprinkler system, and much more! Phone: (352) 273-4518 or visit the web site: <http://fyn.ifas.ufl.edu>. Please visit our web site to find your county Extension office.



Barbara Larson

CITRUS PARK THE NINE PRINCIPLES

The nine Florida-Friendly Landscaping™ principles emphasize sustainable landscaping choices.



Tom Wichman

#1
RIGHT PLANT,
RIGHT PLACE

Select plants suited for a specific location. Plants in the right place will thrive on minimal amounts of water, fertilizer, and pesticides.



Michael Dukas

#2
WATER
EFFICIENTLY

Irrigate only when your lawn and landscape show wilt signs. Water during cooler times of day, and check your irrigation system regularly for leaks and clogs.



Fred Fisher

#3
FERTILIZE
APPROPRIATELY

Apply fertilizers with at least 30% slow-release nitrogen (N) at the right times and in the right amounts to prevent leaching and runoff into ground- and surface waters. Never fertilize before a heavy rain.



#4
MULCH

Maintain a 2-3" layer of mulch on landscape beds to retain soil moisture, prevent erosion, and suppress weed germination.



Kathy Malone

#5
ATTRACT
WILDLIFE

Choose plants with fruits or berries to attract birds and other pollinators. Leave snags and increase vertical layering to provide wildlife habitat.



Paul Choate

#6
MANAGE YARD
PESTS
RESPONSIBLY

Practice Integrated Pest Management (IPM) for a healthy, sustainable approach to keeping your landscape safe from pest insects.



#7
RECYCLE

Return valuable nutrients to the soil and reduce waste disposal by composting grass clippings, raked leaves, and pruned tree and plant parts.



ICS

#8
REDUCE
STORMWATER
RUNOFF

Use features like earth shaping and rain gardens to keep rainwater on your landscape, rather than letting it run off into storm drains, carrying fertilizers, pesticides, soil, and other debris.



Michelle Atkinson

#9
PROTECT THE
WATERFRONT

Protect the water body you live on from chemicals and debris. Designate a 10' maintenance-free zone between the shoreline and your landscape and do not fertilize, mow, or apply pesticides in that area.

EXHIBIT 7

Requirement by Permit Condition Report

App No: 190515-9

Permit No: 36-00208-W

Project Name: CITRUS PARK

Permit Condition No:	10	Permit Condition Code:	<u>WUSTD021-2</u>		
Facility Name	Requirement Name	Col Freq	Sub Freq	Due Date	
WELL - W-1	Calibration report for WELL W-1	Every Five Years	Every Five Years	30-APR-2024	
WELL - W-2	Calibration report for WELL W-2	Every Five Years	Every Five Years	30-APR-2024	
WELL - W-3	Calibration report for WELL W-3	Every Five Years	Every Five Years	30-APR-2024	
Permit Condition No:	12	Permit Condition Code:	<u>WUSTD022-1</u>		
Facility Name	Requirement Name	Col Freq	Sub Freq	Due Date	
WELL - W-1	Monthly withdrawal for WELL W-1	Monthly	Semi-Annually	31-JAN-2020	
WELL - W-2	Monthly withdrawal for WELL W-2	Monthly	Semi-Annually	31-JAN-2020	
WELL - W-3	Monthly withdrawal for WELL W-3	Monthly	Semi-Annually	31-JAN-2020	
Permit Condition No:	19	Permit Condition Code:	<u>WUPWS003-1</u>		
Facility Name	Requirement Name	Col Freq	Sub Freq	Due Date	
PERMIT	Unaccounted for Distribution Losses	Yearly	Yearly	30-APR-2020	

STAFF REPORT DISTRIBUTION LIST

CITRUS PARK

Application No: 190515-9

Permit No: 36-00208-W

INTERNAL DISTRIBUTION

X Vincent Migliore, P.G.

EXTERNAL DISTRIBUTION

- X Permittee - Trost International I N C
- X Engr Consultant - Murchkey Utility Engineering L L C

GOVERNMENT AGENCIES

- X Div of Recreation and Park - District 4 FDEP
- X Engineer, City of Bonita Springs

OTHER INTERESTED PARTIES

- X BONITA SPRINGS UTILITIES INC
- X STONEYS ENTERPRISES

Exhibit No:9



FLORIDA DEPARTMENT OF Environmental Protection

South District Office
2295 Victoria Ave, Suite 364
Ft. Myers, Florida 33901-3875

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

May 4, 2021

In the Matter of an
Application for Permit by:

CPI Citrus Park Utility TRS, LLC
James S Williams
1001 Pennsylvania Ave NW
Washington, District Of Columbia 20004-2505
james.williams@carlyle.com

Lee County – Domestic Wastewater
File Number FLA014477-011-DW2P
Citrus Park North WWTP

NOTICE OF PERMIT ISSUANCE

Enclosed is Permit Number FLA014477-011 to operate the Citrus Park North, issued under Chapter 403, Florida Statutes.

Monitoring requirements under this permit are effective on September 1, 2021. Until such time, the permittee shall continue to monitor and report in accordance with previously effective permit requirements.

NOTICE OF RIGHTS

This action is final and effective on the date filed with the Clerk of the Department unless a petition for an administrative hearing is timely filed under Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. On the filing of a timely and sufficient petition, this action will not be final and effective until further order of the Department. Because the administrative hearing process is designed to formulate final agency action, the hearing process may result in a modification of the agency action or even denial of the application.

Petition for Administrative Hearing

A person whose substantial interests are affected by the Department's action may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. Pursuant to Rules 28-106.201 and 28-106.301, F.A.C., a petition for an administrative hearing must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, any e-mail address, any facsimile number, and telephone number of the petitioner, if the petitioner is not represented by an attorney or a qualified representative; the name, address, and telephone number of the petitioner's representative,

if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;

- (c) A statement of when and how the petitioner received notice of the agency decision;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts that the petitioner contends warrant reversal or modification of the agency's proposed action;
- (f) A statement of the specific rules or statutes that the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wishes the agency to take with respect to the agency's proposed action.

The petition must be filed (received by the Clerk) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, or via electronic correspondence at Agency_Clerk@FloridaDEP.gov. Also, a copy of the petition shall be mailed to the applicant at the address indicated above at the time of filing.

Time Period for Filing a Petition

In accordance with Rule 62-110.106(3), F.A.C., petitions for an administrative hearing by the applicant and persons entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of receipt of this written notice. Petitions filed by any persons other than the applicant, and other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the notice or within 14 days of receipt of the written notice, whichever occurs first. You cannot justifiably rely on the finality of this decision unless notice of this decision and the right of substantially affected persons to challenge this decision has been duly published or otherwise provided to all persons substantially affected by the decision. While you are not required to publish notice of this action, you may elect to do so pursuant Rule 62-110.106(10)(a), F.A.C.

The failure to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C. If you do not publish notice of this action, this waiver may not apply to persons who have not received a clear point-of-entry.

Extension of Time

Under Rule 62-110.106(4), F.A.C., a person whose substantial interests are affected by the Department's action may also request an extension of time to file a petition for an administrative hearing. The Department may, for good cause shown, grant the request for an extension of time. Requests for extension of time must be filed with the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, or via electronic correspondence at Agency_Clerk@FloridaDEP.gov, before the deadline

for filing a petition for an administrative hearing. A timely request for extension of time shall toll the running of the time period for filing a petition until the request is acted upon.

Mediation

Mediation is not available in this proceeding.

Judicial Review

Once this decision becomes final, any party to this action has the right to seek judicial review pursuant to Section 120.68, F.S., by filing a Notice of Appeal pursuant to Florida Rules of Appellate Procedure 9.110 and 9.190 with the Clerk of the Department in the Office of General Counsel (Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000) and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within 30 days from the date this action is filed with the Clerk of the Department.

EXECUTION AND CLERKING

Executed in Ft. Myers, Florida.
STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Jon M. Iglehart
Director of District Management

Attachments:

Permit No. FLA014477-011

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this document and all attachments were sent on the filing date below to the following listed persons:

Patrick Day, P.E., DRMP, Inc., pday@drmp.com

FILING AND ACKNOWLEDGMENT

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



Clerk

May 4, 2021
Date



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

South District Office
2295 Victoria Ave, Suite 364
Ft. Myers, Florida 33901-3875

STATE OF FLORIDA DOMESTIC WASTEWATER FACILITY PERMIT

PERMITTEE:
CPI Citrus Park Utility TRS, LLC

RESPONSIBLE OFFICIAL:
James S. Williams
1001 Pennsylvania Ave NW
Washington, District Of Columbia 20004-2505
(202) 729-5626
james.williams@carlyle.com

PERMIT NUMBER: FLA014477
FILE NUMBER: FLA014477-011-DW2P
ISSUANCE DATE: May 4, 2021
EFFECTIVE DATE: July 14, 2021
EXPIRATION DATE: July 13, 2026

FACILITY:
Citrus Park North WWTP
25501 Trost Blvd
Bonita Springs, FL 34135-6422
Lee County
Latitude: 26° 22' 20.10" N Longitude: 81° 45' 15.84" W

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

WASTEWATER TREATMENT:

An existing 0.199 million gallons per day, three month average daily flow (MGD, TMADF) extended aeration domestic wastewater treatment plant consisting of a common bar screen, 88,000 gallon surge tank, splitter box, and two treatment trains as follows: Train 1 consists of one 96,000 gallon aeration basin, one 43,000 gallon digester, one 11,500 gallon clarifier and one 2,600 gallon chlorine contact chamber. Train 2 consists of two aeration tanks (total volume 100,000 gallons) one 11,500 gallon clarifier, one 24,000 gallon digester and one 2,600 gallon chlorine contact chamber.

REUSE OR DISPOSAL:

Land Application R-001: An existing 0.199 MGD three month average daily flow permitted capacity rapid infiltration basin system. R-001 is a reuse system which consists of five rapid infiltration basins located on site approximately at latitude 26° 22' 17" N, longitude 81° 45' 17" W.

IN ACCORDANCE WITH: The limitations, monitoring requirements, and other conditions set forth in this cover sheet and Part I through Part IX on pages 1 through 17 of this permit.

I. RECLAIMED WATER AND EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

A. Reuse and Land Application Systems

1. During the period beginning on the effective date and lasting through the expiration date of this permit, the permittee is authorized to direct reclaimed water to Reuse System **R-001**. Such reclaimed water shall be limited and monitored by the permittee as specified below and reported in accordance with Permit Condition I.B.6.:

Parameter	Units	Max. /Min	Reclaimed Water Limitations		Monitoring Requirements			Notes
			Limit	Statistical Basis	Frequency of Analysis	Sample Type	Monitoring Site Number	
Flow	MGD	Max Max	0.199 Report	3-Month Rolling Average Monthly Average	5 Days/Week	Recording Flow Meter with Totalizer	FLW-01	See I.A.3
BOD, Carbonaceous 5 day, 20C	mg/L	Max Max Max Max	20.0 30.0 45.0 60.0	Annual Average Monthly Average Weekly Average Single Sample	Bi-weekly; every 2 weeks	8-hr FPC	EFA-01	
Solids, Total Suspended	mg/L	Max Max Max Max	20.0 30.0 45.0 60.0	Annual Average Monthly Average Weekly Average Single Sample	Bi-weekly; every 2 weeks	8-hr FPC	EFA-01	
Coliform, Fecal	#/100mL	Max Max Max Max	200 200 400 800	Monthly Geometric Mean Annual Average 90th Percentile Single Sample	Bi-weekly; every 2 weeks	Grab	EFA-01	See I.A.4 and I.A.5
pH	s.u.	Min Max	6.0 8.5	Single Sample Single Sample	5 Days/Week	Grab	EFA-01	
Chlorine, Total Residual (For Disinfection)	mg/L	Min	0.5	Single Sample	5 Days/Week	Grab	EFA-01	See I.A.6
Nitrogen, Nitrate, Total (as N)	mg/L	Max	12.0	Single Sample	Bi-weekly; every 2 weeks	8-hr FPC	EFA-01	

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

Monitoring Site Number	Description of Monitoring Site
FLW-01	V-notch weir in the flow chamber (metal box) next to the chlorine contact chamber.
EFA-01	After disinfection and before discharge to the ponds.

3. A recording flow meter with totalizer shall be utilized to measure flow and calibrated at least once every 12 months. [62-600.200(25)]
4. The effluent limitation for the monthly geometric mean for fecal coliform is only applicable if 10 or more values are reported. If fewer than 10 values are reported, the monthly geometric mean shall be calculated and reported on the Discharge Monitoring Report to be used to calculate the annual average. All other fecal coliform effluent limitations included in permit condition I.A.1 apply regardless of the number of values reported. [62-600.440(5)(b)]
5. To report the "90th percentile,"

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 FACILITY: Citrus Park North WWTP

PERMIT NUMBER: FLA014477
 PA FILE NUMBER: FLA014477-011-DW2P

- a. Place the bacteria results in ascending order (from lowest to highest value) and assign each sample a number, 1 for the lowest value.
- b. Multiply the total number of samples by 0.9 to determine the 90th percentile level.
- c. Report the value of the sample that corresponds to the 90th percentile level (e.g., 10 samples x 0.9 = 9, report the value of the 9th sample). If the 90th percentile level is not a whole number, rounding or interpolation should be used to determine the 90th percentile. When rounding, round down to the nearest whole number if the decimal is 0.4 or lower, and round up to the nearest whole number if the decimal is 0.5 or higher (e.g., 12 samples x 0.9 = 10.8, report the value of the 11th sample if rounding).

[62-600.440(5)(a)3]

6. Total residual chlorine must be maintained for a minimum contact time of 15 minutes based on peak hourly flow. [62-610.510][62-600.440(5)(c) and (6)(b)]

B. Other Limitations and Monitoring and Reporting Requirements

1. During the period beginning on the effective date and lasting through the expiration date of this permit, the treatment facility shall be limited and monitored by the permittee as specified below and reported in accordance with condition I.B.6.:

Parameter	Units	Max. /Min	Limitations		Monitoring Requirements			Notes
			Limit	Statistical Basis	Frequency of Analysis	Sample Type	Monitoring Site Number	
Percent Capacity, (TMADF/Permitted Capacity) x 100	percent	Max	Report	Monthly Average	Monthly	Calculated	CAL-01	
BOD, Carbonaceous 5 day, 20C (Influent)	mg/L	Max	Report	Single Sample	Bi-weekly; every 2 weeks	8-hr FPC	INF-01	See I.B.3
Solids, Total Suspended (Influent)	mg/L	Max	Report	Single Sample	Bi-weekly; every 2 weeks	8-hr FPC	INF-01	See I.B.3

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

Monitoring Site Number	Description of Monitoring Site
CAL-01	Calculation for percent capacity.
INF-01	At flow splitter box (located between surge tank and aeration basin).

3. Influent samples shall be collected so that they do not contain digester supernatant or return activated sludge, or any other plant process recycled waters. [62-600.660(4)(a)]
4. The sample collection, analytical test methods, and method detection limits (MDLs) applicable to this permit shall be conducted using a sufficiently sensitive method to ensure compliance with applicable water quality standards and effluent limitations and shall be in accordance with Rule 62-4.246, Chapters 62-160 and 62-600, F.A.C., and 40 CFR 136, as appropriate. The list of Department established analytical methods, and corresponding MDLs (method detection limits) and PQLs (practical quantitation limits), which is titled "FAC 62-4 MDL/PQL Table (November 10, 2020)" is available at <https://floridadep.gov/dear/quality-assurance/content/quality-assurance-resources>. The MDLs and PQLs as described in this list shall constitute the minimum acceptable MDL/PQL values and the Department shall not accept results for which the laboratory's MDLs or PQLs are greater than those described above unless alternate MDLs and/or PQLs have been specifically approved by the Department for this permit. Any method included in the list may be used for reporting as long as it meets the following requirements:

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- a. The laboratory's reported MDL and PQL values for the particular method must be equal or less than the corresponding method values specified in the Department's approved MDL and PQL list;
- b. The laboratory reported MDL for the specific parameter is less than or equal to the permit limit or the applicable water quality criteria, if any, stated in Chapter 62-302, F.A.C. Parameters that are listed as "report only" in the permit shall use methods that provide an MDL, which is equal to or less than the applicable water quality criteria stated in 62-302, F.A.C.; and
- c. If the MDLs for all methods available in the approved list are above the stated permit limit or applicable water quality criteria for that parameter, then the method with the lowest stated MDL shall be used.

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

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

- 5. The permittee shall provide safe access points for obtaining representative samples which are required by this permit. [62-600.650(2)]
- 6. Monitoring requirements under this permit are effective on the first day of the second month following the effective date of the permit. Until such time, the permittee shall continue to monitor and report in accordance with previously effective permit requirements. If not already registered to use the Department's Ez Discharge Monitoring Report (EzDMR) system, the permittee should register now in order to begin using the EzDMR system when the monitoring requirements under this permit are effective. During the period of operation authorized by this permit, the permittee shall complete and submit to the Department Discharge Monitoring Reports (DMRs) in accordance with the frequencies specified by the REPORT type (i.e. monthly, quarterly, semiannual, annual, etc.) indicated on the DMR forms attached to this permit. Unless specified otherwise in this permit, monitoring results for each monitoring period shall be submitted in accordance with the associated DMR due dates below. DMRs shall be submitted for each required monitoring period including periods of no discharge.

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

The permittee shall submit the completed DMR to the Department by the twenty-eighth (28th) of the month following the month of operation. Please contact the Department at (239) 344-5600 if you are unable to submit the completed DMR electronically using the EzDMR system.

The Department electronic EzDMR system at the time of permit issuance is available through the DEP Business Portal at: <http://www.fldepportal.com/go/submit-report/>

[62-620.610(18)][62-600.680(1)]

PERMITTEE: CPI Citrus Park Utility TRS, LLC
 FACILITY: Citrus Park North WWTP

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7. During the period of operation authorized by this permit, reclaimed water or effluent shall be monitored annually for the primary and secondary drinking water standards contained in Chapter 62-550, F.A.C., (except for asbestos, total coliform, color, odor, and residual disinfectants). These monitoring results shall be reported to the Department annually on the DMR. During years when a permit is not renewed, a certification stating that no new non-domestic wastewater dischargers have been added to the collection system since the last reclaimed water or effluent analysis was conducted may be submitted with the signed DMR in lieu of performing the analysis. When such a certification is submitted with the DMR, monitoring not required this period should be noted on the DMR. The annual reclaimed water or effluent analysis report, and certification if applicable, shall be completed and submitted in a timely manner so as to be received by the Department at the address identified on the DMR by January 28 of each year. Approved analytical methods identified in Rule 62-620.100(3)(j), F.A.C., shall be used for the analysis. If no method is included for a parameter, methods specified in Chapter 62-550, F.A.C., shall be used. *[62-600.660(2) and (3)(d)]**[62-600.680(2)]**[62-610.300(4)]*

8. The permittee shall submit an Annual Reuse Report using DEP Form 62-610.300(4)(a)2. on or before January 1 of each year. *[62-610.870(3)]*

9. Except as otherwise specified in this permit, all reports and other information required by this permit, including 24-hour notifications, shall be submitted to the Department in a digital format when practicable. The Department’s electronic mailing address is:

SouthDistrict@FloridaDEP.gov

 Please contact the Department at (239) 344-5600 if you are unable to submit electronically.
[62-620.610(11)]

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

II. BIOSOLIDS MANAGEMENT REQUIREMENTS

A. Basic Requirements

1. Biosolids generated by this facility may be transferred to Karle Enviro-Organic Recycling, Inc. or disposed of in a Class I solid waste landfill. Transferring biosolids to an alternative biosolids treatment facility does not require a permit modification. However, use of an alternative biosolids treatment facility requires submittal of a copy of the agreement pursuant to Rule 62-640.880(1)(c), F.A.C., along with a written notification to the Department at least 30 days before transport of the biosolids. *[62-620.320(6), 62-640.880(1)]*

2. The permittee shall monitor and keep records of the quantities of biosolids generated, received from source facilities, treated, distributed and marketed, land applied, used as a biofuel or for bioenergy, transferred to another facility, or landfilled. These records shall be kept for a minimum of five years. *[62-640.650(4)(a)]*

3. Biosolids quantities shall be monitored by the permittee as specified below. Results shall be reported on the permittee's Discharge Monitoring Report for Monitoring Group RMP-Q in accordance with Condition I.B.6.

Parameter	Units	Max. /Min	Biosolids Limitation		Monitoring Requirements			Notes
			Limit	Statistical Basis	Frequency of Analysis	Sample Type	Monitoring Site Number	
Biosolids Quantity (Landfilled)	dry tons	Max	Report	Monthly Total	Monthly	Calculated	RMP-001	
Biosolids Quantity (Transferred)	dry tons	Max	Report	Monthly Total	Monthly	Calculated	RMP-001	

PERMITTEE: CPI Citrus Park Utility TRS, LLC
FACILITY: Citrus Park North WWTP

PERMIT NUMBER: FLA014477
PA FILE NUMBER: FLA014477-011-DW2P

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

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

Monitoring Site Number	Description of Monitoring Site Calculations
RMP-001	Calculated per truck load.

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

B. Disposal

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

C. Transfer

1. The permittee shall not be held responsible for treatment and management violations that occur after its biosolids have been accepted by a permitted biosolids treatment facility with which the source facility has an agreement in accordance with subsection 62-640.880(1)(c), F.A.C., for further treatment, management, or disposal. [62-640.880(1)(b)]
2. The permittee shall keep hauling records to track the transport of biosolids between the facilities. The hauling records shall contain the following information:

Source Facility	Biosolids Treatment Facility or Treatment Facility
1. Date and time shipped	1. Date and time received
2. Amount of biosolids shipped	2. Amount of biosolids received
3. Degree of treatment (if applicable)	3. Name and ID number of source facility
4. Name and ID Number of treatment facility	4. Signature of hauler
5. Signature of responsible party at source facility	5. Signature of responsible party at treatment facility
6. Signature of hauler and name of hauling firm	

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

[62-640.880(4)]

D. Receipt

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

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III. GROUND WATER REQUIREMENTS

A. Construction Requirements

1. The permittee shall give at least 72-hour notice to the Department's South District Office, prior to the installation of any monitoring wells. *[62-520.600(6)(h)]*
2. Before construction of new ground water monitoring wells, a soil boring shall be made at each new monitoring well location to properly determine monitoring well specifications such as well depth, screen interval, screen slot, and filter pack. *[62-520.600(6)(g)]*
3. Within 30 days after installation of a monitoring well, the permittee shall submit to the Department's South District Office well completion reports and soil boring/lithologic logs on the DEP Form 62-520.900(3), Monitoring Well Completion Report. *[62-520.600(6)(j) and .900(3)]*
4. All piezometers and monitoring wells not part of the approved ground water monitoring plan shall be plugged and abandoned in accordance with Rule 62-532.500(5), F.A.C., unless future use is intended. *[62-532.500(5)]*

B. Operational Requirements

1. For the Part IV land application system(s), all ground water quality criteria specified in Chapter 62-520, F.A.C., shall be met at the edge of the zone of discharge. The zone of discharge for Land Application Site R-001 shall extend horizontally 100 feet from the application site and vertically to the base of the surficial aquifer. *[62-520.200(27)] [62-520.465]*
2. The ground water minimum criteria specified in Rule 62-520.400 F.A.C., shall be met within the zone of discharge. *[62-520.400 and 62-520.420(4)]*
3. If the concentration for any constituent listed in Permit Condition III.6. in the natural background quality of the ground water is greater than the stated maximum, or in the case of pH is also less than the minimum, the representative background quality shall be the prevailing standard. *[62-520.420(2)]*
4. During the period of operation authorized by this permit, the permittee shall continue to sample ground water at the monitoring wells identified in Permit Condition III.5., below in accordance with this permit and the approved ground water monitoring plan prepared in accordance with Rule 62-520.600, F.A.C. *[62-520.600] [62-610.510]*
5. The following monitoring wells shall be sampled for Reuse System R-001 located at Land Application Site RIB-001.

Monitoring Well ID	Alternate Well Name and/or Description of Monitoring Location	Latitude	Longitude	Depth (Feet)	Aquifer Monitored	Well Type	New or Existing
MWB-149933	MWB-01 BACKGROUND	26°22' 23"	81°45' 11"	17	Surficial	Background	Existing
MWI-149947	MWI-01 INTERMEDIATE	26°22' 26"	81°45' 17"	17	Surficial	Intermediate	Existing
MWC-149934	MWC-01 COMPLIANCE	26°22' 20"	81°45' 17"	17	Surficial	Compliance	Existing

[62-520.600] [62-610.510]

6. The following parameters shall be analyzed for each monitoring well identified in Permit Condition III.5.:

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

[62-520.600(11)(b)] [62-600.670] [62-600.650(3)] [62-520.310(5)]

7. Water levels shall be recorded before evacuating each well for sample collection. Elevation references shall include the top of the well casing and land surface at each well site (NAVD allowable) at a precision of plus or minus 0.01 foot. *[62-520.600(11)(c)] [62-610.510(3)(b)]*
8. Ground water monitoring wells shall be purged prior to sampling to obtain representative samples. *[62-160.210] [62-600.670(3)]*
9. Analyses shall be conducted on unfiltered samples, unless filtered samples have been approved by the Department's South District Office as being more representative of ground water conditions. *[62-520.310(5)]*
10. Ground water monitoring test results shall be submitted on Part D of Form 62-620.910(10) in accordance with Permit Condition I.B.6. *[62-520.600(11)(b)] [62-600.670] [62-600.680(1)] [62-620.610(18)]*
11. If any monitoring well becomes inoperable or damaged to the extent that sampling or well integrity may be affected, the permittee shall notify the Department's South District Office within two business days from discovery, and a detailed written report shall follow within ten days after notification to the Department. The written report shall detail what problem has occurred and remedial measures that have been taken to prevent recurrence or request approval for replacement of the monitoring well. All monitoring well design and replacement shall be approved by the Department's South District Office before installation. *[62-520.600(6)(l)]*
12. The permittee shall sample the monitoring wells for the primary and secondary drinking water parameters included in Rules 62-550.310 and 62-550.320, F.A.C., (except for asbestos and all parameters in Table 5 of Chapter 62-550, F.A.C., other than Di(2-ethylhexyl) adipate and Di(2-ethylhexyl) phthalate). Results of this sampling shall be submitted to the Department's South District Office with the application for permit renewal. Sampling shall occur no sooner than 180 days before submittal of the renewal application. *[62-520.600(5)(b)]*

IV. ADDITIONAL REUSE AND LAND APPLICATION REQUIREMENTS

A. Part IV Rapid Infiltration Basins

1. Advisory signs shall be posted around the site boundaries to designate the nature of the project area. *[62-610.518]*
2. The maximum annual average loading rate to the five rapid infiltration basins located on site shall be limited to 3 inches per day (as applied to the entire bottom area). *[62-610.523(3)]*
3. Rapid infiltration basins shall be routinely maintained to control vegetation growth and to maintain percolation capability by scarification or removal of deposited solids. Basin bottoms shall be maintained to be level. *[62-610.523(6) and (7)]*

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4. Routine aquatic weed control and regular maintenance of storage pond embankments and access areas are required. *[62-610.514 and 62-610.414]*
5. Overflows from emergency discharge facilities on storage ponds or on infiltration ponds, basins, or trenches shall be reported as abnormal events in accordance with Permit Condition IX.20. *[62-610.800(9)]*

V. OPERATION AND MAINTENANCE REQUIREMENTS

A. Staffing Requirements

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

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

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

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

1. The application to renew this permit shall include an updated capacity analysis report prepared in accordance with Rule 62-600.405, F.A.C. *[62-600.405(5)]*
2. The application to renew this permit shall include a detailed operation and maintenance performance report prepared in accordance with Rule 62-600.735, F.A.C. *[62-600.735(1)]*

C. Recordkeeping Requirements

1. The permittee shall maintain the following records and make them available for inspection at the following address: on the site of the permitted facility.
 - a. Records of all compliance monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, including, if applicable, a copy of the laboratory certification showing the certification number of the laboratory, for at least three years from the date the sample or measurement was taken;
 - b. Copies of all reports required by this permit for at least three years from the date the report was prepared;
 - c. Records of all data, including reports and documents, used to complete the application for this permit for at least three years from the date the application was filed;
 - d. Monitoring information, including a copy of the laboratory certification showing the laboratory certification number, related to the residuals use and disposal activities for the time period set forth in Chapter 62-640, F.A.C., for at least three years from the date of sampling or measurement;
 - e. A copy of the current wastewater facility permit;
 - f. Copies of the current operation and maintenance manuals for the wastewater facility and the collection/transmission systems owned or operated by the wastewater facility permittee as required by Chapters 62-600 and 62-604, F.A.C.;
 - g. A copy of any required record drawings for the wastewater facility and the collection/transmission systems owned or operated by the wastewater facility permittee;
 - h. Copies of the licenses of the current certified operators;

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- i. Copies of the logs and schedules showing plant operations and equipment maintenance for three years from the date of the logs or schedules. The logs shall, at a minimum, include identification of the plant; the signature and license number of the operator(s) and the signature of the person(s) making any entries; date and time in and out; specific operation and maintenance activities, including any preventive maintenance or repairs made or requested; results of tests performed and samples taken, unless documented on a laboratory sheet; and notation of any notification or reporting completed in accordance with Rule 62-602.650(3), F.A.C. The logs shall be maintained on-site in a location accessible to 24-hour inspection, protected from weather damage, and current to the last operation and maintenance performed; and
- j. Records of biosolids quantities, treatment, monitoring, and hauling for at least five years.

[62-620.350, 62-604.500, 62-602.650, 62-640.650(4)]

VI. SCHEDULES

- 1. The following improvement actions shall be completed according to the following schedule:

Improvement Action	Completion Date
1. Repair broken audio alarm at the south station	8/30/2021
2. Remove excess vegetation from percolation ponds.	8/30/2021

[62-620.320(6)]

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

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

VII. INDUSTRIAL PRETREATMENT PROGRAM REQUIREMENTS

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

VIII. OTHER SPECIFIC CONDITIONS

- 1. In the event that the wastewater facilities or equipment, including collection/transmission systems, no longer function as intended, are no longer safe in terms of public health and safety (including inactive or abandoned facilities), or odor, noise, aerosol drift, or lighting adversely affects neighboring developed areas at the levels prohibited by paragraphs 62-600.400(2)(a) and 62-604.400(2)(c), F.A.C., corrective action (which may include additional maintenance or modifications of the permitted facilities) shall be taken by the permittee. Other corrective action may be required to ensure compliance with rules of the Department. Additionally, the treatment, management, use or land application of residuals shall not cause a violation of the odor prohibition in subsection 62-296.320(2), F.A.C. *[62-600.410(5), 62-604.500(3) and 62-640.400(6)]*
- 2. All collection/transmission systems shall be operated and maintained so as to provide uninterrupted service. *[62-604.500(2)]*
- 3. The deliberate introduction of stormwater in any amount into collection/transmission systems designed solely for the introduction (and conveyance) of domestic/industrial wastewater; or the deliberate introduction of stormwater into collection/transmission systems designed for the introduction or conveyance of combinations of

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storm and domestic/industrial wastewater in amounts which may reduce the efficiency of pollutant removal by the treatment plant is prohibited, except as provided by Rule 62-610.472, F.A.C. [62-604.130(4)]

4. Cross-connection, as defined in Rule 62-550.200, F.A.C., between the wastewater facility, including the collection/transmission system, and a potable water system is prohibited. [62-550.360][62-604.130(3)]
5. The collection/transmission operation and maintenance manual shall be maintained and revised periodically in accordance with subsection 62-604.500(4), F.A.C., to reflect any alterations performed or to reflect experience resulting from operation. However, a new operation and maintenance manual is not required to be developed for each project if there is already an existing manual that is applicable to the facilities being constructed. [62-604.500(4)]
6. Collection/transmission system overflows shall be reported to the Department in accordance with Permit Condition IX. 20. [62-604.550] [62-620.610(20)]
7. The operating authority of a collection/transmission system and the permittee of a treatment plant are prohibited from accepting connections of wastewater discharges which have not received necessary pretreatment or which contain materials or pollutants (other than normal domestic wastewater constituents):
 - a. Which may cause fire or explosion hazards; or
 - b. Which may cause excessive corrosion or other deterioration of wastewater facilities due to chemical action or pH levels; or
 - c. Which are solid or viscous and obstruct flow or otherwise interfere with wastewater facility operations or treatment; or
 - d. Which result in the wastewater temperature at the introduction of the treatment plant exceeding 40°C or otherwise inhibiting treatment; or
 - e. Which result in the presence of toxic gases, vapors, or fumes that may cause worker health and safety problems.[62-604.130(5)]
8. The treatment facility, storage ponds for Part II systems, rapid infiltration basins, and/or infiltration trenches shall be enclosed with a fence or otherwise provided with features to discourage the entry of animals and unauthorized persons. [62-610.518(1) and 62-600.400(2)(b)]
9. Screenings and grit removed from the wastewater facilities shall be collected in suitable containers and hauled to a Department approved Class I landfill or to a landfill approved by the Department for receipt/disposal of screenings and grit. [62-701.300(1)(a)]
10. Where required by Chapter 471 or Chapter 492, F.S., applicable portions of reports that must be submitted under this permit shall be signed and sealed by a professional engineer or a professional geologist, as appropriate. [62-620.310(4)]
11. The permittee shall provide verbal notice to the Department's South District Office as soon as practical after discovery of a sinkhole or other karst feature within an area for the management or application of wastewater, wastewater residuals (sludges), or reclaimed water. The permittee shall immediately implement measures appropriate to control the entry of contaminants, and shall detail these measures to the Department's South District Office in a written report within 7 days of the sinkhole discovery. [62-620.320(6)]
12. The permittee shall provide notice to the Department of the following:
 - a. Any new introduction of pollutants into the facility from an industrial discharger which would be subject to Chapter 403, F.S., and the requirements of Chapter 62-620, F.A.C., if it were directly discharging those pollutants; and

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- b. Any substantial change in the volume or character of pollutants being introduced into that facility by a source which was identified in the permit application and known to be discharging at the time the permit was issued.

Notice shall include information on the quality and quantity of effluent introduced into the facility and any anticipated impact of the change on the quantity or quality of effluent or reclaimed water to be discharged from the facility. If pretreatment becomes necessary, this permit may be modified to require the permittee to develop and implement a local pretreatment program in accordance with the requirements of Chapter 62-625, F.A.C.

[62-620.625(2)]

IX. GENERAL CONDITIONS

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to Chapter 403, Florida Statutes. Any permit noncompliance constitutes a violation of Chapter 403, Florida Statutes, and is grounds for enforcement action, permit termination, permit revocation and reissuance, or permit revision. *[62-620.610(1)]*
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviations from the approved drawings, exhibits, specifications, or conditions of this permit constitutes grounds for revocation and enforcement action by the Department. *[62-620.610(2)]*
3. As provided in subsection 403.087(7), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor authorize any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit or authorization that may be required for other aspects of the total project which are not addressed in this permit. *[62-620.610(3)]*
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title. *[62-620.610(4)]*
5. This permit does not relieve the permittee from liability and penalties for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted source; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department. The permittee shall take all reasonable steps to minimize or prevent any discharge, reuse of reclaimed water, or residuals use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[62-620.610(5)]*
6. If the permittee wishes to continue an activity regulated by this permit after its expiration date, the permittee shall apply for and obtain a new permit. *[62-620.610(6)]*
7. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control, and related appurtenances, that are installed and used by the permittee to achieve compliance with the conditions of this permit. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to maintain or achieve compliance with the conditions of the permit. *[62-620.610(7)]*
8. This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[62-620.610(8)]*

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9. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, including an authorized representative of the Department and authorized EPA personnel, when applicable, upon presentation of credentials or other documents as may be required by law, and at reasonable times, depending upon the nature of the concern being investigated, to:
- Enter upon the permittee's premises where a regulated facility, system, or activity is located or conducted, or where records shall be kept under the conditions of this permit;
 - Have access to and copy any records that shall be kept under the conditions of this permit;
 - Inspect the facilities, equipment, practices, or operations regulated or required under this permit; and
 - Sample or monitor any substances or parameters at any location necessary to assure compliance with this permit or Department rules.

[62-620.610(9)]

10. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data, and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except as such use is proscribed by Section 403.111, F.S., or Rule 62-620.302, F.A.C. Such evidence shall only be used to the extent that it is consistent with the Florida Rules of Civil Procedure and applicable evidentiary rules. *[62-620.610(10)]*
11. When requested by the Department, the permittee shall within a reasonable time provide any information required by law which is needed to determine whether there is cause for revising, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. The permittee shall also provide to the Department upon request copies of records required by this permit to be kept. If the permittee becomes aware of relevant facts that were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be promptly submitted, or corrections promptly reported to the Department. *[62-620.610(11)]*
12. Unless specifically stated otherwise in Department rules, the permittee, in accepting this permit, agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard. *[62-620.610(12)]*
13. The permittee, in accepting this permit, agrees to pay the applicable regulatory program and surveillance fee in accordance with Rule 62-4.052, F.A.C. *[62-620.610(13)]*
14. This permit is transferable only upon Department approval in accordance with Rule 62-620.340, F.A.C. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department. *[62-620.610(14)]*
15. The permittee shall give the Department written notice at least 60 days before inactivation or abandonment of a wastewater facility or activity and shall specify what steps will be taken to safeguard public health and safety during and following inactivation or abandonment. *[62-620.610(15)]*
16. The permittee shall apply for a revision to the Department permit in accordance with Rules 62-620.300, F.A.C., and the Department of Environmental Protection Guide to Permitting Wastewater Facilities or Activities Under Chapter 62-620, F.A.C., at least 90 days before construction of any planned substantial modifications to the permitted facility is to commence or with Rule 62-620.325(2), F.A.C., for minor modifications to the permitted facility. A revised permit shall be obtained before construction begins except as provided in Rule 62-620.300, F.A.C. *[62-620.610(16)]*
17. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. The permittee shall be responsible for

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any and all damages which may result from the changes and may be subject to enforcement action by the Department for penalties or revocation of this permit. The notice shall include the following information:

- a. A description of the anticipated noncompliance;
- b. The period of the anticipated noncompliance, including dates and times; and
- c. Steps being taken to prevent future occurrence of the noncompliance.

[62-620.610(17)]

18. Sampling and monitoring data shall be collected and analyzed in accordance with Rule 62-4.246 and Chapters 62-160, 62-600, and 62-610, F.A.C., and 40 CFR 136, as appropriate.
 - a. Monitoring results shall be reported at the intervals specified elsewhere in this permit and shall be reported on a Discharge Monitoring Report (DMR), DEP Form 62-620.910(10), or as specified elsewhere in the permit.
 - b. If the permittee monitors any contaminant more frequently than required by the permit, using Department approved test procedures, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.
 - c. Calculations for all limitations which require averaging of measurements shall use an arithmetic mean unless otherwise specified in this permit.
 - d. Except as specifically provided in Rule 62-160.300, F.A.C., any laboratory test required by this permit shall be performed by a laboratory that has been certified by the Department of Health Environmental Laboratory Certification Program (DOH ELCP). Such certification shall be for the matrix, test method and analyte(s) being measured to comply with this permit. For domestic wastewater facilities, testing for parameters listed in Rule 62-160.300(4), F.A.C., shall be conducted under the direction of a certified operator.
 - e. Field activities including on-site tests and sample collection shall follow the applicable standard operating procedures described in DEP-SOP-001/01 adopted by reference in Chapter 62-160, F.A.C.
 - f. Alternate field procedures and laboratory methods may be used where they have been approved in accordance with Rules 62-160.220, and 62-160.330, F.A.C.

[62-620.610(18)]

19. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule detailed elsewhere in this permit shall be submitted no later than 14 days following each schedule date. *[62-620.610(19)]*
20. The permittee shall report to the Department any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and time, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. For noncompliance events related to sanitary sewer overflows or bypass events, these reports must include the data described above (with the exception of time of discovery) as well as the type of event (sanitary sewer overflows or bypass events), type of sewer overflow (e.g., manhole), discharge volumes by the treatment works treating domestic sewage, types of human health and environmental impacts of the sewer overflow event, and whether the noncompliance was related to wet weather. The written submission may be provided electronically using the Department's Business Portal at <https://www.fldepportal.com/go/> (via "Submit" followed by "Report" or "Registration/Notification"). Notice required under paragraph (d) may be provided together with the written submission using the Business Portal. All noncompliance events related to sanitary sewer overflows or bypass events submitted after December 21, 2020 shall be submitted electronically.

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- a. The following shall be included as information which must be reported within 24 hours under this condition:
 - (1) Any unanticipated bypass which causes any reclaimed water or the effluent to exceed any permit limitation or results in an unpermitted discharge,
 - (2) Any upset which causes any reclaimed water or the effluent to exceed any limitation in the permit,
 - (3) Violation of a maximum daily discharge limitation for any of the pollutants specifically listed in the permit for such notice, and
 - (4) Any unauthorized discharge to surface or ground waters.
- b. Oral reports as required by this subsection shall be provided as follows:
 - (1) For unauthorized releases or spills of treated or untreated wastewater reported pursuant to subparagraph (a)4. that are in excess of 1,000 gallons per incident, or where information indicates that public health or the environment will be endangered, oral reports shall be provided to the Department by calling the STATE WATCH OFFICE TOLL FREE NUMBER (800) 320-0519, as soon as practical, but no later than 24 hours from the time the permittee becomes aware of the discharge. The permittee, to the extent known, shall provide the following information to the State Watch Office:
 - (a) Name, address, and telephone number of person reporting;
 - (b) Name, address, and telephone number of permittee or responsible person for the discharge;
 - (c) Date and time of the discharge and status of discharge (ongoing or ceased);
 - (d) Characteristics of the wastewater spilled or released (untreated or treated, industrial or domestic wastewater);
 - (e) Estimated amount of the discharge;
 - (f) Location or address of the discharge;
 - (g) Source and cause of the discharge;
 - (h) Whether the discharge was contained on-site, and cleanup actions taken to date;
 - (i) Description of area affected by the discharge, including name of water body affected, if any; and
 - (j) Other persons or agencies contacted.
 - (2) Oral reports not otherwise required to be provided pursuant to subparagraph (b)1. above, shall be provided to the Department within 24 hours from the time the permittee becomes aware of the circumstances.
- c. If the oral report has been received within 24 hours, the noncompliance has been corrected, and the noncompliance did not endanger health or the environment, the Department shall waive the written report.
- d. In accordance with Section 403.077, F.S., unauthorized releases or spills reportable to the State Watch Office pursuant to subparagraph (b)1. above shall also be reported to the Department within 24 hours from the time the permittee becomes aware of the discharge. The permittee shall provide to the Department information reported to the State Watch Office. Notice of unauthorized releases or spills may be provided to the Department through the Department's Public Notice of Pollution web page at <https://floridadep.gov/pollutionnotice>.
 - (1) If, after providing notice pursuant to paragraph (d) above, the permittee determines that a reportable unauthorized release or spill did not occur or that an amendment to the notice is warranted, the permittee may submit additional notice to the Department documenting such determination.
 - (2) If, after providing notice pursuant to paragraph (d) above, the permittee discovers that a reportable unauthorized release or spill has migrated outside the property boundaries of the installation, the permittee must provide an additional notice to the Department that the release has migrated outside the property boundaries within 24 hours after its discovery of the migration outside of the property boundaries.

[62-620.610(20)] [62-620.100(3)] [403.077, F.S.]

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

PERMITTEE: CPI Citrus Park Utility TRS, LLC
FACILITY: Citrus Park North WWTP

PERMIT NUMBER: FLA014477
PA FILE NUMBER: FLA014477-011-DW2P

22. Bypass Provisions.

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

[62-620.610(22)]

23. Upset Provisions.

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

[62-620.610(23)]

PERMITTEE: CPI Citrus Park Utility TRS, LLC
FACILITY: Citrus Park North WWTP

PERMIT NUMBER: FLA014477
PA FILE NUMBER: FLA014477-011-DW2P

Executed in Ft. Myers, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Jon M. Iglehart
Director of District Management

Attachments:
Discharge Monitoring Report
Statement of Basis

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed submit this report to: <http://www.fldepportal.com/go/submit-report/>

PERMITTEE NAME: CPI Citrus Park Utility TRS, LLC
 MAILING ADDRESS: 1001 Pennsylvania Ave NW
 Washington, District Of Columbia 20004- 2505

PERMIT NUMBER: FLA014477-011-DW2P

FACILITY: Citrus Park North
 LOCATION: 25501 Trost Blvd
 Bonita Springs, FL 34135-6422

LIMIT: Final
 CLASS SIZE: N/A
 MONITORING GROUP NUMBER: R-001
 MONITORING GROUP DESCRIPTION: RLA consisting of 5 perc ponds, with Influent

REPORT FREQUENCY: Monthly
 PROGRAM: Domestic

COUNTY: Lee
 OFFICE: South District

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

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Flow	Sample Measurement										
PARM Code 50050 1 Mon. Site No. FLW-01	Permit Requirement	Report (Mo.Avg.)	0.199 (3Mo.Avg.)	MGD						5 Days/Week	Flow Totalizer
BOD, Carbonaceous 5 day, 20C	Sample Measurement										
PARM Code 80082 Y Mon. Site No. EFA-01	Permit Requirement					20.0 (An.Avg.)	mg/L			Bi-weekly; every 2 weeks	8-hr FPC
BOD, Carbonaceous 5 day, 20C	Sample Measurement										
PARM Code 80082 A Mon. Site No. EFA-01	Permit Requirement				60.0 (Max.)	45.0 (Max.Wk.Avg.)	30.0 (Mo.Avg.)	mg/L		Bi-weekly; every 2 weeks	8-hr FPC
Solids, Total Suspended	Sample Measurement										
PARM Code 00530 Y Mon. Site No. EFA-01	Permit Requirement					20.0 (An.Avg.)	mg/L			Bi-weekly; every 2 weeks	8-hr FPC
Solids, Total Suspended	Sample Measurement										
PARM Code 00530 A Mon. Site No. EFA-01	Permit Requirement				60.0 (Max.)	45.0 (Max.Wk.Avg.)	30.0 (Mo.Avg.)	mg/L		Bi-weekly; every 2 weeks	8-hr FPC
Coliform, Fecal	Sample Measurement										
PARM Code 74055 Y Mon. Site No. EFA-01	Permit Requirement					200 (An.Avg.)	#/100mL			Bi-weekly; every 2 weeks	Grab

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

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

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

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP R-001

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Coliform, Fecal	Sample Measurement										
PARM Code 74055 A Mon. Site No. EFA-01	Permit Requirement				800 (Max.)	400 (90th %)	200 (Mo.Geo.Mn.)	#/100mL		Bi-weekly; every 2 weeks	Grab
pH	Sample Measurement										
PARM Code 00400 A Mon. Site No. EFA-01	Permit Requirement				6.0 (Min.)		8.5 (Max.)	s.u.		5 Days/Week	Grab
Chlorine, Total Residual (For Disinfection)	Sample Measurement										
PARM Code 50060 A Mon. Site No. EFA-01	Permit Requirement				0.5 (Min.)			mg/L		5 Days/Week	Grab
Nitrogen, Nitrate, Total (as N)	Sample Measurement										
PARM Code 00620 A Mon. Site No. EFA-01	Permit Requirement						12.0 (Max.)	mg/L		Bi-weekly; every 2 weeks	8-hr FPC
Percent Capacity, (TMADF/Permitted Capacity) x 100	Sample Measurement										
PARM Code 00180 P Mon. Site No. CAL-01	Permit Requirement						Report (Mo.Avg.)	percent	0	Monthly	Calculated
BOD, Carbonaceous 5 day, 20C (Influent)	Sample Measurement										
PARM Code 80082 G Mon. Site No. INF-01	Permit Requirement						Report (Max.)	mg/L	0	Bi-weekly; every 2 weeks	8-hr FPC
Solids, Total Suspended (Influent)	Sample Measurement										
PARM Code 00530 G Mon. Site No. INF-01	Permit Requirement						Report (Max.)	mg/L	0	Bi-weekly; every 2 weeks	8-hr FPC

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed submit this report to: <http://www.fldepportal.com/go/submit-report/>

PERMITTEE NAME: CPI Citrus Park Utility TRS, LLC
 MAILING ADDRESS: 1001 Pennsylvania Ave NW
 Washington, District Of Columbia 20004- 2505

PERMIT NUMBER: FLA014477-011-DW2P

FACILITY: Citrus Park North
 LOCATION: 25501 Trost Blvd
 Bonita Springs, FL 34135-6422

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

REPORT FREQUENCY: Monthly
 PROGRAM: Domestic

COUNTY: Lee
 OFFICE: South District

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

Parameter		Quantity or Loading	Units	Quality or Concentration	Units	No. Ex.	Frequency of Analysis	Sample Type
Biosolids Quantity (Landfilled)	Sample Measurement							
PARM Code B0008 + Mon. Site No. RMP-001	Permit Requirement	Report (Mo.Total)	dry tons			0	Monthly	Calculated
Biosolids Quantity (Transferred)	Sample Measurement							
PARM Code B0007 + Mon. Site No. RMP-001	Permit Requirement	Report (Mo.Total)	dry tons			0	Monthly	Calculated

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

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

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

DEPARTMENT OF ENVIRONMENTAL PROTECTION DISCHARGE MONITORING REPORT - PART A

When Completed submit this report to: <http://www.fldepportal.com/go/submit-report/>

PERMITTEE NAME: CPI Citrus Park Utility TRS, LLC
 MAILING ADDRESS: 1001 Pennsylvania Ave NW
 Washington, District Of Columbia 20004- 2505

PERMIT NUMBER: FLA014477-011-DW2P

FACILITY: Citrus Park North
 LOCATION: 25501 Trost Blvd
 Bonita Springs, FL 34135-6422

LIMIT: Final
 CLASS SIZE: N/A
 MONITORING GROUP NUMBER: RWS-A
 MONITORING GROUP DESCRIPTION: Annual Reclaimed Water or Effluent Analysis

REPORT FREQUENCY: Annually
 PROGRAM: Domestic

COUNTY: Lee
 OFFICE: South District

RE-SUBMITTED DMR:
 NO DISCHARGE FROM SITE:
 MONITORING NOT REQUIRED:*
 MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading	Units	Quality or Concentration	Units	No. Ex.	Frequency of Analysis	Sample Type
Antimony, Total Recoverable (GWS = 6)**	Sample Measurement							
PARM Code 01268 P Mon. Site No. RWS-A	Permit Requirement			Report (Max.)	ug/L	0	Annually	24-hr FPC
Arsenic, Total Recoverable (GWS = 10)	Sample Measurement							
PARM Code 00978 P Mon. Site No. RWS-A	Permit Requirement			Report (Max.)	ug/L	0	Annually	24-hr FPC
Barium, Total Recoverable (GWS = 2,000)	Sample Measurement							
PARM Code 01009 P Mon. Site No. RWS-A	Permit Requirement			Report (Max.)	ug/L	0	Annually	24-hr FPC
Beryllium, Total Recoverable (GWS = 4)	Sample Measurement							
PARM Code 00998 P Mon. Site No. RWS-A	Permit Requirement			Report (Max.)	ug/L	0	Annually	24-hr FPC
Cadmium, Total Recoverable (GWS = 5)	Sample Measurement							
PARM Code 01113 P Mon. Site No. RWS-A	Permit Requirement			Report (Max.)	ug/L	0	Annually	24-hr FPC
Chromium, Total Recoverable (GWS =100)	Sample Measurement							
PARM Code 01118 P Mon. Site No. RWS-A	Permit Requirement			Report (Max.)	ug/L	0	Annually	24-hr FPC

*THE "MONITORING NOT REQUIRED" CHECKBOX SHOULD BE SELECTED WHEN A CERTIFICATION STATEMENT IN ACCORDANCE WITH SUBSECTION 62-600.680(2), F.A.C., IS SUBMITTED WITH THIS DMR. SEE CERTIFICATION STATEMENT IN COMMENTS SECTION BELOW.

**GROUND WATER STANDARD (GWS) FOR REFERENCE AND REVIEW ONLY.

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

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

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

NO NEW NON-DOMESTIC WASTEWATER DISCHARGERS HAVE BEEN ADDED TO THE COLLECTION SYSTEM SINCE THE LAST RECLAIMED WATER OR EFFLUENT ANALYSIS WAS CONDUCTED.
 SIGN AND DATE:

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP RWS-A

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Cyanide, Free (amen. to chlorination)(GWS = 200)	Sample Measurement										
PARM Code 00722 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Fluoride, Total (as F) (GWS = 4.0/2.0)	Sample Measurement										
PARM Code 00951 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Lead, Total Recoverable (GWS = 15)	Sample Measurement										
PARM Code 01114 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Mercury, Total Recoverable (GWS = 2)	Sample Measurement										
PARM Code 71901 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Nickel, Total Recoverable (GWS = 100)	Sample Measurement										
PARM Code 01074 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Nitrogen, Nitrate, Total (as N) (GWS = 10)	Sample Measurement										
PARM Code 00620 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Nitrogen, Nitrite, Total (as N) (GWS = 1)	Sample Measurement										
PARM Code 00615 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Nitrite plus Nitrate, Total 1 det. (as N)(GWS = 10)	Sample Measurement										
PARM Code 00630 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Selenium, Total Recoverable (GWS =50)	Sample Measurement										
PARM Code 00981 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Sodium, Total Recoverable (GWS = 160)	Sample Measurement										
PARM Code 00923 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP RWS-A

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Thallium, Total Recoverable (GWS = 2)	Sample Measurement										
PARM Code 00982 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
1,1-dichloroethylene (GWS = 7)	Sample Measurement										
PARM Code 34501 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
1,1,1-trichloroethane (GWS = 200)	Sample Measurement										
PARM Code 34506 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
1,1,2-trichloroethane (GWS = 5)	Sample Measurement										
PARM Code 34511 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
1,2-dichloroethane (GWS = 3)	Sample Measurement										
PARM Code 32103 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
1,2-dichloropropane (GWS = 5)	Sample Measurement										
PARM Code 34541 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
1,2,4-trichlorobenzene (GWS = 70)	Sample Measurement										
PARM Code 34551 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Benzene (GWS = 1)	Sample Measurement										
PARM Code 34030 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Carbon tetrachloride (GWS = 3)	Sample Measurement										
PARM Code 32102 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Cis-1,2-dichloroethene (GWS = 70)	Sample Measurement										
PARM Code 81686 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP RWS-A

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Dichloromethane (methylene chloride)(GWS = 5)	Sample Measurement										
PARM Code 03821 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Ethylbenzene (GWS = 700)	Sample Measurement										
PARM Code 34371 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Monochlorobenzene (GWS = 100)	Sample Measurement										
PARM Code 34031 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
1,2-dichlorobenzene (GWS = 600)	Sample Measurement										
PARM Code 34536 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
1,4-dichlorobenzene (GWS = 75)	Sample Measurement										
PARM Code 34571 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Styrene, Total (GWS = 100)	Sample Measurement										
PARM Code 77128 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Tetrachloroethylene (GWS = 3)	Sample Measurement										
PARM Code 34475 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Toluene (GWS = 1,000)	Sample Measurement										
PARM Code 34010 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
1,2-trans-dichloroethylene (GWS = 100)	Sample Measurement										
PARM Code 34546 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Trichloroethylene (GWS = 3)	Sample Measurement										
PARM Code 39180 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP RWS-A

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Vinyl chloride (GWS = 1)	Sample Measurement										
PARM Code 39175 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Xylenes (GWS = 10,000)	Sample Measurement										
PARM Code 81551 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
2,3,7,8-tetrachlorodibenzo-p-dioxin(GWS = 3x10 ⁻⁵)	Sample Measurement										
PARM Code 34675 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
2,4-dichlorophenoxyacetic acid (GWS = 70)	Sample Measurement										
PARM Code 39730 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Silvex (GWS = 50)	Sample Measurement										
PARM Code 39760 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Alachlor (GWS = 2)	Sample Measurement										
PARM Code 39161 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Atrazine (GWS = 3)	Sample Measurement										
PARM Code 39033 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Benzo(a)pyrene (GWS = 0.2)	Sample Measurement										
PARM Code 34247 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Carbofuran (GWS = 40)	Sample Measurement										
PARM Code 81405 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Chlordane (tech mix. and metabolites)(GWS = 2)	Sample Measurement										
PARM Code 39350 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP RWS-A

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Dalapon (GWS = 200)	Sample Measurement										
PARM Code 38432 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Bis(2-ethylhexyl)adipate (GWS = 400)	Sample Measurement										
PARM Code 77903 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Bis (2-ethylhexyl) phthalate (GWS = 6)	Sample Measurement										
PARM Code 39100 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Dibromochloropropane (DBCP) (GWS = 0.2)	Sample Measurement										
PARM Code 82625 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Dinoseb (GWS = 7)	Sample Measurement										
PARM Code 30191 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Diquat (GWS = 20)	Sample Measurement										
PARM Code 04443 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Endothall (GWS = 100)	Sample Measurement										
PARM Code 38926 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Endrin (GWS = 2)	Sample Measurement										
PARM Code 39390 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Ethylene dibromide (1,2-dibromoethane)(GWS = 0.02)	Sample Measurement										
PARM Code 77651 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	Grab	
Glyphosate (GWS = 0.7)	Sample Measurement										
PARM Code 79743 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP RWS-A

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Heptachlor (GWS = 0.4)	Sample Measurement										
PARM Code 39410 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Heptachlor epoxide (GWS = 0.2)	Sample Measurement										
PARM Code 39420 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Hexachlorobenzene (GWS = 1)	Sample Measurement										
PARM Code 39700 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Hexachlorocyclopentadiene (GWS = 50)	Sample Measurement										
PARM Code 34386 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Gamma BHC (Lindane) (GWS = 0.2)	Sample Measurement										
PARM Code 39782 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Methoxychlor (GWS = 40)	Sample Measurement										
PARM Code 39480 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Oxamyl (vydate) (GWS = 200)	Sample Measurement										
PARM Code 38865 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Pentachlorophenol (GWS = 1)	Sample Measurement										
PARM Code 39032 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Picloram (GWS = 500)	Sample Measurement										
PARM Code 39720 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Polychlorinated Biphenyls (PCBs)(GWS = 0.5)	Sample Measurement										
PARM Code 39516 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP RWS-A

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Simazine (GWS = 4)	Sample Measurement										
PARM Code 39055 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Toxaphene (GWS = 3)	Sample Measurement										
PARM Code 39400 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Trihalomethane, Total by summation(GWS = 0.080)	Sample Measurement										
PARM Code 82080 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	Grab	
Radium 226 + Radium 228, Total (GWS = 5)	Sample Measurement										
PARM Code 11503 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	pCi/L	0	Annually	24-hr FPC	
Alpha, Gross Particle Activity (GWS = 15)	Sample Measurement										
PARM Code 80045 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	pCi/L	0	Annually	24-hr FPC	
Aluminum, Total Recoverable (GWS = 0.2)	Sample Measurement										
PARM Code 01104 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Chloride (as Cl) (GWS = 250)	Sample Measurement										
PARM Code 00940 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Iron, Total Recoverable (GWS = 0.3)	Sample Measurement										
PARM Code 00980 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Copper, Total Recoverable (GWS = 1,000)	Sample Measurement										
PARM Code 01119 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Manganese, Total Recoverable (GWS = 50)	Sample Measurement										
PARM Code 11123 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	

DISCHARGE MONITORING REPORT - PART A (Continued)

FACILITY: Citrus Park North

MONITORING GROUP RWS-A

PERMIT NUMBER: FLA014477-011-DW2P

NUMBER:

MONITORING PERIOD From: _____ To: _____

Parameter		Quantity or Loading		Units	Quality or Concentration			Units	No. Ex.	Frequency of Analysis	Sample Type
Silver, Total Recoverable (GWS = 100)	Sample Measurement										
PARM Code 01079 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
Sulfate, Total (GWS = 250)	Sample Measurement										
PARM Code 00945 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Zinc, Total Recoverable (GWS = 5,000)	Sample Measurement										
PARM Code 01094 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	ug/L	0	Annually	24-hr FPC	
pH (GWS = 6.5-8.5)	Sample Measurement										
PARM Code 00400 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	s.u.	0	Annually	Grab	
Solids, Total Dissolved (TDS) (GWS = 500)	Sample Measurement										
PARM Code 70295 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	
Foaming Agents (GWS = 0.5)	Sample Measurement										
PARM Code 01288 P Mon. Site No. RWS-A	Permit Requirement					Report (Max.)	mg/L	0	Annually	24-hr FPC	

DAILY SAMPLE RESULTS - PART B

Permit Number:
Monitoring Period

FLA014477-011-DW2P
From: _____ To: _____

Facility: Citrus Park North

Code	BOD, Carbonaceous 5 day, 20C mg/L	BOD, Carbonaceous 5 day, 20C (Influent) mg/L	Chlorine, Total Residual (For Disinfection) mg/L	Coliform, Fecal #/100mL	Flow MGD	Nitrogen, Nitrate, Total (as N) mg/L	Solids, Total Suspended mg/L	Solids, Total Suspended (Influent) mg/L	pH s.u.		
Mon. Site	80082	80082	50060	74055	50050	00620	00530	00530	00400		
	EFA-01	INF-01	EFA-01	EFA-01	FLW-01	EFA-01	EFA-01	INF-01	EFA-01		
1											
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26											
27											
28											
29											
30											
31											
Total											
Mo. Avg.											

PLANT STAFFING:

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

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

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

Lead Operator Class: _____ Certificate No: _____ Name: _____

GROUNDWATER MONITORING REPORT - PART D

Facility Name: Citrus Park North
 Permit Number: FLA014477-011-DW2P
 County: Lee

Monitoring Well ID: MWB-149933
 Well Type: Background
 Description: MWB-01
 BACKGROUND

Report Frequency: Quarterly
 Program: Domestic

Office: South District

Re-submitted DMR:

Monitoring Period From: _____ To: _____

Date Sample Obtained: _____

Time Sample Obtained: _____

Was the well purged before sampling? ___ Yes ___ No

Parameter	PARM Code	Sample Measurement	Permit Requirement	Units	Sample Type	Frequency of Analysis	Detection Limits	Analysis Method	Sampling Equipment Used	Samples Filtered (L/F/N)
Water Level Relative to NGVD	82545		Report	ft	In Situ	Quarterly				
Nitrogen, Nitrate, Total (as N)	00620		Report	mg/L	Grab	Quarterly				
Solids, Total Dissolved (TDS)	70295		Report	mg/L	Grab	Quarterly				
Arsenic, Total Recoverable	00978		Report	ug/L	Grab	Quarterly				
Chloride (as Cl)	00940		Report	mg/L	Grab	Quarterly				
Cadmium, Total Recoverable	01113		Report	ug/L	Grab	Quarterly				
Chromium, Total Recoverable	01118		Report	ug/L	Grab	Quarterly				
Lead, Total Recoverable	01114		Report	ug/L	Grab	Quarterly				
Coliform, Fecal	74055		Report	#/100mL	Grab	Quarterly				
pH	00400		Report	s.u.	In Situ	Quarterly				
Sulfate, Total	00945		Report	mg/L	Grab	Quarterly				
Turbidity	00070		Report	NTU	Grab	Quarterly				

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

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

COMMENTS AND EXPLANATION (Reference all attachments here):

GROUNDWATER MONITORING REPORT - PART D

Facility Name: Citrus Park North
 Permit Number: FLA014477-011-DW2P
 County: Lee

Monitoring Well ID: MWC-149934
 Well Type: Compliance
 Description: MWC-01
 COMPLIANCE

Report Frequency: Quarterly
 Program: Domestic

Office: South District

Re-submitted DMR:

Monitoring Period From: _____ To: _____

Date Sample Obtained: _____

Time Sample Obtained: _____

Was the well purged before sampling? ___ Yes ___ No

Parameter	PARM Code	Sample Measurement	Permit Requirement	Units	Sample Type	Frequency of Analysis	Detection Limits	Analysis Method	Sampling Equipment Used	Samples Filtered (L/F/N)
Water Level Relative to NGVD	82545		Report	ft	In Situ	Quarterly				
Nitrogen, Nitrate, Total (as N)	00620		10	mg/L	Grab	Quarterly				
Solids, Total Dissolved (TDS)	70295		500	mg/L	Grab	Quarterly				
Arsenic, Total Recoverable	00978		10	ug/L	Grab	Quarterly				
Chloride (as Cl)	00940		250	mg/L	Grab	Quarterly				
Cadmium, Total Recoverable	01113		5	ug/L	Grab	Quarterly				
Chromium, Total Recoverable	01118		100	ug/L	Grab	Quarterly				
Lead, Total Recoverable	01114		15	ug/L	Grab	Quarterly				
Coliform, Fecal	74055		4	#/100mL	Grab	Quarterly				
pH	00400		6.5-8.5	s.u.	In Situ	Quarterly				
Sulfate, Total	00945		250	mg/L	Grab	Quarterly				
Turbidity	00070		Report	NTU	Grab	Quarterly				

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

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

COMMENTS AND EXPLANATION (Reference all attachments here):

GROUNDWATER MONITORING REPORT - PART D

Facility Name: Citrus Park North
 Permit Number: FLA014477-011-DW2P
 County: Lee

Monitoring Well ID: MWI-149947
 Well Type: Intermediate
 Description: MWI-01
 INTERMEDIATE

Report Frequency: Quarterly
 Program: Domestic

Office: South District

Re-submitted DMR:

Monitoring Period From: _____ To: _____

Date Sample Obtained: _____

Time Sample Obtained: _____

Was the well purged before sampling? ___ Yes ___ No

Parameter	PARM Code	Sample Measurement	Permit Requirement	Units	Sample Type	Frequency of Analysis	Detection Limits	Analysis Method	Sampling Equipment Used	Samples Filtered (L/F/N)
Water Level Relative to NGVD	82545		Report	ft	In Situ	Quarterly				
Nitrogen, Nitrate, Total (as N)	00620		Report	mg/L	Grab	Quarterly				
Solids, Total Dissolved (TDS)	70295		Report	mg/L	Grab	Quarterly				
Arsenic, Total Recoverable	00978		Report	ug/L	Grab	Quarterly				
Chloride (as Cl)	00940		Report	mg/L	Grab	Quarterly				
Cadmium, Total Recoverable	01113		Report	ug/L	Grab	Quarterly				
Chromium, Total Recoverable	01118		Report	ug/L	Grab	Quarterly				
Lead, Total Recoverable	01114		Report	ug/L	Grab	Quarterly				
Coliform, Fecal	74055		Report	#/100mL	Grab	Quarterly				
pH	00400		Report	s.u.	In Situ	Quarterly				
Sulfate, Total	00945		Report	mg/L	Grab	Quarterly				
Turbidity	00070		Report	NTU	Grab	Quarterly				

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

NAME/TITLE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE NO	DATE (mm/dd/yyyy)

COMMENTS AND EXPLANATION (Reference all attachments here):

INSTRUCTIONS FOR COMPLETING THE WASTEWATER DISCHARGE MONITORING REPORT

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

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

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

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

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

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

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

PART A -DISCHARGE MONITORING REPORT (DMR)

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

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

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

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

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

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

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

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

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

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

PART B - DAILY SAMPLE RESULTS

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

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

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

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

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

PART D - GROUND WATER MONITORING REPORT

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

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

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

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

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

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

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

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

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

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

SPECIAL INSTRUCTIONS FOR LIMITED WET WEATHER DISCHARGES

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

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

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

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

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

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

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

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

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

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

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

PERMIT NUMBER: FLA014477-011

FACILITY NAME: Citrus Park North WWTP

FACILITY LOCATION: 25501 Trost Blvd, Bonita Springs, FL 34135-6422
Lee County

NAME OF PERMITTEE: CPI Citrus Park Utility TRS, LLC

PERMIT WRITER: Bill Robertson, P.E.

1. SUMMARY OF APPLICATION

a. Chronology of Application

Application Number: FLA014477-011-DW2P

Application Submittal Date: February 18, 2021

b. Type of Facility

Domestic Wastewater Treatment Plant

Ownership Type: Private

SIC Code: 4952

c. Facility Capacity

Existing Permitted Capacity:	0.199 mgd Three Month Average Daily Flow
Proposed Increase in Permitted Capacity:	0.000 mgd Three Month Average Daily Flow
Proposed Total Permitted Capacity:	0.199 mgd Three Month Average Daily Flow

d. Description of Wastewater Treatment

An existing 0.199 million gallons per day, three month average daily flow (MGD, TMADF) extended aeration domestic wastewater treatment plant consisting of a common bar screen, 88,000 gallon surge tank, splitter box, and two treatment trains as follows: Train one consists of one 96,000 gallon aeration basin, one 43,000 gallon digester, one 11,500 gallon clarifier and one 2,600 gallon chlorine contact chamber. Train two consists of two aeration tanks (total volume 100,000 gallons) one 11,500 gallon clarifier, one 24,000 gallon digester and one 2,600 gallon chlorine contact chamber.

e. Description of Effluent Disposal and Land Application Sites (as reported by applicant)

Effluent is disposed of via R-001, an existing 0.199 MGD three month average daily flow permitted capacity rapid infiltration basin system. R-001 is a reuse system which consists of five rapid infiltration basins located on site having a capacity of 0.199 MGD located approximately at latitude 26°22' 17" N, longitude 81°45' 17" W.

2. SUMMARY OF SURFACE WATER DISCHARGE

This facility does not discharge to surface waters.

3. BASIS FOR PERMIT LIMITATIONS AND MONITORING REQUIREMENTS

This facility is authorized to direct reclaimed water to Reuse System R-001, a rapid infiltration basin system, based on the following:

Parameter	Units	Max/Min	Limit	Statistical Basis	Rationale
Flow	MGD	Max	0.199	3-Month Rolling Average	62-600.700(2)(b) & 62-610.810(5) FAC
		Max	Report	Monthly Average	62-600.700(2)(b) & 62-610.810(5) FAC
BOD, Carbonaceous 5 day, 20C	mg/L	Max	20.0	Annual Average	62-610.510 & 62-600.420(3)(a)1. FAC
		Max	30.0	Monthly Average	62-610.510 & 62-600.420(3)(a)2. FAC
		Max	45.0	Weekly Average	62-610.510 & 62-600.420(3)(a)3. FAC
		Max	60.0	Single Sample	62-610.510 & 62-600.420(3)(a)4. FAC
Solids, Total Suspended	mg/L	Max	20.0	Annual Average	62-610.510 & 62-600.420(3)(b)1. FAC
		Max	30.0	Monthly Average	62-610.510 & 62-600.420(3)(b)2. FAC
		Max	45.0	Weekly Average	62-610.510 & 62-600.420(3)(b)3. FAC
		Max	60.0	Single Sample	62-610.510 & 62-600.420(3)(b)4. FAC
Coliform, Fecal	#/100mL	Max	200	Annual Average	62-62-600.440(5)(a)1 FAC
		Max	200	Monthly Geometric Mean	62-62-600.440(5)(a)2 FAC
		Max	400	90th Percentile	62-62-600.440(5)(a)3 FAC
		Max	800	Single Sample	62-62-600.440(5)(a)4 FAC
pH	s.u.	Min	6.0	Single Sample	62-600.445 FAC
		Max	8.5	Single Sample	62-600.445 FAC
Chlorine, Total Residual (For Disinfection)	mg/L	Min	0.5	Single Sample	62-610.510 & 62-600.440(5)(c) FAC
Nitrogen, Nitrate, Total (as N)	mg/L	Max	12.0	Single Sample	62-610.510(1) FAC

Other Limitations and Monitoring Requirements:

Parameter	Units	Max/Min	Limit	Statistical Basis	Rationale
Percent Capacity, (TMADF/Permitted Capacity) x 100	percent	Max	Report	Monthly Average	62-600.405(4) FAC
BOD, Carbonaceous 5 day, 20C (Influent)	mg/L	Max	Report	Single Sample	62-600.660(1) FAC
Solids, Total Suspended (Influent)	mg/L	Max	Report	Single Sample	62-600.660(1) FAC
Monitoring Frequencies and Sample Types	-	-	-	All Parameters	62-600 FAC & 62-699 FAC and/or BPJ of permit writer

Parameter	Units	Max/ Min	Limit	Statistical Basis	Rationale
Sampling Locations	-	-	-	All Parameters	62-600, 62-610.412, 62-610.463(1), 62-610.568, 62-610.613 FAC and/or BPJ of permit writer

5. DISCUSSION OF CHANGES TO PERMIT LIMITATIONS

The current wastewater permit for this facility FLA014477-011-DW2P expires on July 13, 2021

Fecal Coliform, 90th percentile parameter is added to monitoring requirements for R-001 per Rule 62-62-600.440(5)(a)3 F.A.C.

6. BIOSOLIDS MANAGEMENT REQUIREMENTS

Biosolids generated by this facility may be transferred to Karle Enviro-Organic Recycling, and Inc. or disposed of in a Class I solid waste landfill.

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

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

7. GROUND WATER MONITORING REQUIREMENTS

Ground water monitoring requirements have been established in accordance with Chapters 62-520, 532, 610, and 620, F.A.C.

8. PERMIT SCHEDULES

A schedule of improvement actions is included in Section VI of the permit.

9. INDUSTRIAL PRETREATMENT REQUIREMENTS

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

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

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

11. REQUESTED VARIANCES OR ALTERNATIVES TO REQUIRED STANDARDS

No variances were requested for this facility.

12. THE ADMINISTRATIVE RECORD

The administrative record is available for public inspection electronically at <http://prodenv.dep.state.fl.us/DepNexus/public/electronic-documents/FLA014477/facility!search>, or during normal business hours at the location specified in item 12. Copies will be provided at a minimal charge per page.

14. DEP CONTACT

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

Bill Robertson, P.E.
Professional Engineer I
South District Office

2295 Victoria Ave
Suite 364
Ft. Myers, FL 33901-3875

Telephone No.: (239) 344-5657

ATTACHMENT 3



FLORIDA DEPARTMENT OF Environmental Protection

South District
2295 Victoria Ave. Suite 364
Fort Myers, FL 33901
SouthDistrict@DEP.State.Fl.us

Ron DeSantis
Governor

Jay Collins
Lt. Governor

Alexis A. Lambert
Secretary

April 8, 2026

James Williams
Carlyle Property Investors (Master REIT), L.L.C.
10100 Santa Monica Blvd Suite 600
San Francisco, CA 90067

Re: Compliance Assistance Offer
Citrus Park RV Resort (Bonita Terra)
Facility ID: 5360048
Lee County-PW

Dear James Williams:

A Sanitary Survey Compliance Inspection was conducted at your facility on **March 19, 2026**. During this Inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Specifically, potential non-compliance with the requirements of Chapters 373 and 403, Florida Statutes and Chapters 62-550 and 62-555, Florida Administrative Code were observed. Please see the attached inspection report for a full account of department observations and recommendations.

We request you review the item(s) of concern noted and respond within **30 days** of receipt of this Compliance Assistance Offer. Your response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed.
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the item(s) of concern.

James Williams
Compliance Assistance Offer Letter
Citrus Park RV Resort (Bonita Terra)
Facility ID: 5360048
Lee County-PW
Page 2 of 2

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

Please address your response and any questions to **Megan Torres** of the South District Office at **239-344-5670** or via e-mail at Megan.Torres@FloridaDEP.gov. We look forward to your cooperation with this matter.

Sincerely,



David Fiess, MPA
Assistant Director of District Management

Enclosures: Inspection Report
Lead and Copper Sampling Plan Template
Disinfection By-product Sampling Plan Template

cc: Mark Nicklas, mnicklas@murexproperties.com
Adam Volkman, avolkman@murexproperties.com
Eric Zimmerman, ezimmerman@murexproperties.com
Grayson St. John, grayson@wti.services and monitoring@wti.services
Gregor St. John, gregor@wti.services

Florida Department of Environmental Protection

South District Public Water System Sanitary Survey Inspection Report

Water system: Citrus Park RV Resort (Bonita Terra)		System PWS #: 5360048	Survey date: 03/19/2026
Facility type class: Community - (2C)		Source type: Ground	4-Log approved: No
Facility address: 25501 Trost Blvd, Bonita Springs, FL 34135			
Facility phone(s):		Facility email/fax:	
Facility contact: Mark Nicklas / Eric Zimmerman		Facility contact phone(s): 239-790-0004 / 239-992-3030	
Facility contact email/fax: mnicklas@murexproperties.com / ezimmerman@murexproperties.com			
Owner name: James Williams		Company name: Carlyle Property Investors (Master REIT), L.L.C.	
Owner/Corp address: 10100 Santa Monica Blvd Suite 600		City: San Francisco	State: CA Zip: 90067
Owner/Corp phone(s):		Owner e-contact(s):	
Operator name: Grayson St. John / Kevin Serrano		Certification: C-30055 / C-24898	
Operator phone(s): 863-517-2520		Operator email/fax: grayson@wti.services / monitoring@wti.services	
On-site Rep: Grayson and Gregor St. John	Immediate Action Required? Yes	Inspection recap given? Yes	

GENERAL INFORMATION

Number of Service Connections 1,653
 Population Served 3,282
 Plant Design Capacity 495,000 GPD
 Average Day (from MORs) 180,753 GPD
 Max. Day (from MORs) 502,900 GPD
 Total Storage Capacity 299,500 gallons

Comments:

Facility has exceeded 75% of their Maximum Day Design Capacity in Jan, Feb, March, Nov, & Dec of 2025, and Jan & Feb of 2026. Facility exceeded 100% of their Design Capacity in May 2025.

OPERATION & MAINTENANCE

Certified Operator: Yes No Not required
 Plant visits conducted by: Operator
 O&M Log: Yes No O&M Manual: Yes No
 Visitation Frequency
 Hrs/day: *Required* 3 *Actual* 3
 Hrs/wk: *Required* _____ *Actual* _____
 Days/wk: *Required* 7 *Actual* 7
 Non-consecutive Days? Yes No N/A
 MORs submitted regularly? Yes No N/A
 Data missing from MORs? Yes No N/A

CHLORINATION (Disinfection)

Type: Hypo-Chlorination
 Capacity 1,000 gallons x2 Unit Total Each
 Chlorine Feed Rate 20%, 25%, and 30%
 Avg. Amount of Cl₂ gas used _____
 Chlorine Residuals: Plant 4.6 Remote 4.6
 Remote tap location 2nd St. comfort station
 Injection Points into clearwell
 Booster Pump Info _____
 Comments:

POE: 10:40 am Remote: 12:17 pm. Each well connected to their own chlorine pump. 2 wells run at a time therefore 2 pumps run at a time.

AERATION (Gases, Fe, & Mn Removal)

Type Degasifier Conventional Capacity Unk
 Aerator Condition Good
 Visible Algae Growth Yes No
 Protective Screen Condition Good
 Comments:

Attached to a 5,500-gallon clearwell.

RAW WATER SOURCE

GROUND; Number of Wells 3
 SURFACE/UDI; Source _____
 PURCHASED from PWS ID # _____
 Emergency Water Source _____
 Emergency Water Capacity _____

AUXILIARY POWER SOURCE

Yes None Not Required
 Source Generator
 Capacity of Standby (kW) 150
 Switchover: Automatic Manual
 Standby Plan: Yes No
 Hrs Operated Under Load 30 minutes per week
 What equipment does it operate?
 Well pumps _____
 High Service Pumps _____
 Treatment Equipment _____
 Satisfy 1/2 max-day demand? Yes No Unk
 Comments:

DISTRIBUTION SYSTEM

Flow Measuring Device Flow Meter
 Meter Size & Type TEK-FLUX 1400 A
 Meter tested w/i 5 yrs? Yes No Unk N/A
 Backflow Prevention: Yes No
 Cross-connections None observed on site.
 Cross-connection Control Program: Yes No N/A
 Coliform Sampling Plan: Yes No
 Stage 2 DBPs Sampling Plan: Yes No N/A
 Lead & Copper Sampling Plan: Yes No N/A
 Comments:

Flow meter calibration: 09/2025. Flushing and valve exercising programs in place. DBP and Lead & Copper sampling plans have outdated information.

SERVICE AREA CHARACTERISTICS:

Mobile Home Park
 RV Park

Food Service: Yes No N/A

OTHER TASTE/ODOR CONTROL PROCESSES

Explain:

AMMONIATION

Capacity 500 (gal) Injection Points storage tank

Comments:

Chlorine to ammonia ratio: 5:1

Feed rate: 30%

CORROSION CONTROL

Capacity _____ (gal) Injection Points _____

Chemicals Used _____

Comments:

N/A

COAGULATION (Turbidity Removal)

Chemicals Used _____

Is settling OK? Yes No

Comments:

N/A

SOFTENING (Ca/Mg Hardness Removal)

Chemical Precipitation Process:

Chemicals Used:

Is settling OK? Yes No

Excessive carry-over? Yes No

Secondary Precipitation Yes No

Recarbonation Type _____

Sludge Recirculation Used Yes No

Comments:

N/A

Ion Exchange Process:

Capacity _____ (gal)

Grade of Salt for Regeneration _____

Backwash Effluent Destination _____

Comments:

N/A

STABILIZATION

Effluent S.I. _____

Is pH control done? Yes No

Chemical Used sulfuric acid

Injection Point into pipe before clearwell

pH Range of Effluent 8.1

SUBPART H/UDI TURBIDITY METERS

Each filter has a turbidity meter Yes No

Combined turbidity meter probe Point(s):

Last time calibrated _____

Comments:

FILTRATION (Suspended Solids Removal)

Type Cartridge sand filter

Size Unk No. of Units 1

Length of Filter Runs Unk

Type of Filter Media Unk

Is media visible? Yes No

Clean after BW? Yes No

Filter Rate None BW Rate None

Filter Capacity Unk

Cracks/Cementation/Channeling Yes No

Effluent Stability _____

Algae Growth Yes No

Turbidity in clearwell? Yes No

Comments:

Cartridge filter is not in use and bypassed.

REVERSE OSMOSIS (Dissolved Solids Removal)

Pressure 130 (psi)

No. of Modules 4 Permeate Cap. S.C.

Blend Rate (GPM) 20% blend

Chemicals Used anti-scalant

Waste-to-product Ratio 30:70

Pre-treatment 1 pre-filter: 5 micron sediment

Effluent Quality: TDS (mg/L) 5 mg/L

Waste Disposal Site to wastewater plant

IW Permit # & Expir. Date N/A

Comments:

Permeate capacity is 67% permeate 33% concentrate.

RO is cleaned 2x a year or when TDS is high.

100-gallon anti-scalant tank. AWC A-102 Plus.

FLUORIDATION

Chemical Used _____ Strength _____

Corrosion Noted Yes No

Plugging Noted Yes No

High Level Ventilation (acid) Yes No

Acid carboys/day tank vented outside Yes No

Designated Electrical Outlet (acid) Yes No

Analytical Testing Equipment Yes No

Anti-siphon Valves Yes No

Residual Range _____

Point of Application _____

Emergency Eyewash Yes No

Comments:

N/A

STORAGE FACILITIES

Tank Type	Clearwell	Ground							
Capacity GAL	5,500	294,000							
Material	Concrete	Steel							
By-pass Piping	No	No							
Gravity Drain	No	Yes							
PRV/ARV	None	None							
Protected Openings	Yes	Yes							
Pressure Gauge	No	No							
Sight Glass or Level Indicator	No	No							
Fittings for Sight Glass	N/A	N/A							
Access Padlocked	Yes	Yes							
Last Inspection Date (for tanks with access manholes)	N/A	09/2025							
On/Off Pressure	N/A	N/A							
Height to Bottom of Elevated Tank	N/A	N/A							
Height to Max. Water Level	2.3 ft	21.6 ft							

Comments:

The clearwell has cracks and water is leaking out in several places.

HIGH SERVICE (HSP), BACKWASH (BWP), TRANSFER (TP) and OTHER (OP) PUMPS

Pump Purpose	Transfer	High Service	Transfer						
Pump Number	Clearwell 1 & 2	1-3	RO 1						
Type	Centrifugal	Centrifugal	Turbine						
Capacity (gpm)	Unk	400	Unk						
Motor HP	5	15	15						
Date Installed	Unk	2016	Unk						

Comments:

High service pump 1 piping has a leak.

GROUND WATER SOURCE

Well Name (System Identification)		Well 1 (Well 3)	Well 2 (Well 4)	Well 3 (Well 5)	
Florida Well ID		AAC4170	AAC4172	AAC4171	
Year Drilled		1989	1989	1991	
Depth Drilled		117'	112'	110'	
Length (outside casing)		75'	75'	80'	
Diameter (outside casing)		8"	8"	8"	
Is inundation of well possible?		<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No
6' X 6' X 4" Concrete Pad		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No
PUMP	Type	Submersible	Submersible	Submersible	
	Rated Capacity (gpm)	200	200	200	
	Motor Horsepower	7.5	7.5	7.5	
Well casing 12" above grade?		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No
Well Casing Sanitary Seal		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No
Raw Water Sampling Tap		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No
Above Ground Check Valve		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No
Fence/Housing		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No
Well Vent Protection		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No

COMMENTS:

No hazards within 100 ft of the wells.

TREATMENT PROCESSES IN USE:

Aeration, Chlorination, Ammonia, Anti-Scalant, Sulfuric Acid, Reverse Osmosis

Is additional treatment needed? Yes No

If so, for control of what deficiencies?

MONITORING VIOLATIONS	MCL VIOLATIONS
-----------------------	----------------

Facility exceeded the MCL for TTHM, 80 mg/L, and HAA5, 60 mg/L, with a result of 253.95 mg/L and 161.77 mg/L, respectively. The facility is now required to conduct quarterly monitoring of contaminants for 4 consecutive quarters until contaminant results are below 60 mg/L for TTHMs and 45 mg/L for HAA5s.

MONITORING COMMENTS:

DEFICIENCIES:

Deficiency	Rule Reference	Corrective Action	Severity	Corrected
Facility exceeded 75% of their Maximum Day Design Capacity in January, February, March, November, & December 2025, and January & February 2026. Facility exceeded 100% of their Design Capacity in May 2025.	62-555.348(3) F.A.C.	When the total maximum-day quantity of finished water produced exceeds 75% of the total permitted maximum-day operating capacity of the plant, the supplier of water shall submit source/treatment/storage capacity analysis reports to the department within 6 months of receiving the sanitary survey report which must be performed by a licensed engineer.	SNC	
Point of entry chlorine sample reported a value of 4.6 mg/L. Remote location chlorine sample reported a value of 4.6 mg/L. See photo 27. Corrected on 3/20/2026. See photos 28 and 29.	62-555.320(12)(d) F.A.C. 62-550.310(2)(a) F.A.C.	Provide a continuous disinfection treatment for drinking water. Maintain a continuous minimum total chlorine residual of 0.6 mg/L and a maximum chlorine residual of 4.0 mg/L. Submit photos showing deficiencies have been corrected.	SNC	Yes
Leak on pipe for high service pump 1. See photo 24.	62-555.350(2) F.A.C.	Repair the leak on pipe for high service pump 1. Submit photos/documentation showing deficiency has been corrected.	Minor	
Clearwell has cracks and is leaking. See photo 25 and 26.	62-555.350(2) F.A.C.	Repair/reseal the inner wall of the clearwell to prevent leaks. Clean and repair outside cracks on clearwell. Submit photos/documentation showing deficiency has been corrected.	Minor	
No cross connection control plan on site.	62-555.360(2) F.A.C.	The facility shall establish and implement a routine cross-connection control program to detect and control cross-connections and prevent backflow of contaminants into the water system. Submit documentation showing deficiency has been corrected.	Minor	
No generator logbook / maintenance records on site.	62-555.350(2) F.A.C.	Provide records showing auxiliary power maintenance is being exercised. Submit photos/documentation showing deficiency has been corrected.	Minor	
Lead and Copper sampling plan contains outdated contact information. See photo 17.	62-550.800 F.A.C.	Submit an updated lead and copper sampling plan with up-to-date contact information.	Minor	
Disinfection By-product sampling plan does not reflect current sampling timelines. See photo 18.	62-550.822 F.A.C.	Submit a new DBP sampling plan to reflect the quarterly sampling timeline.	Minor	
No primary chlorine meter calibration verification on site.	62-555.340(2) F.A.C.	Submit the primary calibration record or invoice for chlorine meter if it was purchased within 1 year of inspection date.	Minor	

Any deficiency marked with an asterisk (*) is a repeat violation.

ADDITIONAL COMMENTS:

Recommendation: Replace well seals on all three wells.

Inspector: Megan Torres
Digitally signed by Megan Torres
 Date: 2026.04.03 11:21:19 -04'00'

Approved by: Steven Pereira
Digitally signed by Steven Pereira
 Date: 2026.04.03 12:47:20 -04'00'



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Jay Collins
Lt. Governor

Alexis A. Lambert
Secretary

South District
2295 Victoria Ave. Suite 364
Fort Myers, FL 33901
SouthDistrict@FloridaDEP.gov

Site Report

Facility Name: Citrus Park RV Resort (Bonita Terra)
PWS ID#: 5360048
Address: 25501 Trost Blvd, Bonita Springs, FL 34135
Inspection Date: March 19, 2026
Inspectors: Megan Torres

Digital Photo Log

Type of Camera Used: Phone
Photographer: Megan Torres

I certify that these photos represent the true on-site conditions observed and have not been altered in any way.

Signature of Photographer *Megan Torres*

Date: March 19, 2026

Inspection Photos

Image #:	1
Photo Description:	View of well 1.
Photo Location:	26°22'29.3"N 81°45'08.0"W



Image #:	2
Photo Description:	View of well 2.
Photo Location:	26°22'28.9"N 81°45'07.3"W



Inspection Photos

Image #:	3
Photo Description:	View of well 3.
Photo Location:	26°22'28.9"N 81°45'07.4"W



Image #:	4
Photo Description:	View of Tek-flux 1400A flow meter.
Photo Location:	26°22'27.9"N 81°45'07.5"W



Inspection Photos

Image #:	5
Photo Description:	View of water treatment plant.
Photo Location:	26°22'27.9"N 81°45'07.6"W



Image #:	6
Photo Description:	View of 294,000-gallon storage tank.
Photo Location:	26°22'28.2"N 81°45'07.6"W



Inspection Photos

Image #:	7
Photo Description:	View of chlorine tanks - 1,000 gallons each.
Photo Location:	26°22'28.1"N 81°45'07.5"W



Image #:	8
Photo Description:	View of 500-gallon ammonia tank.
Photo Location:	26°22'28.1"N 81°45'07.3"W



Inspection Photos

Image #:	9
Photo Description:	2 transfer pumps.
Photo Location:	26°22'28.4"N 81°45'07.6"W



Image #:	10
Photo Description:	View of clearwell and degassifier.
Photo Location:	26°22'28.5"N 81°45'07.6"W



Inspection Photos

Image #:	11
Photo Description:	View of 500-gallon sulfuric acid tank.
Photo Location:	26°22'28.8"N 81°45'07.5"W



Image #:	12
Photo Description:	View of 100-gallon anti-scalant tank and chemical label.
Photo Location:	26°22'28.5"N 81°45'07.6"W



Inspection Photos

Image #:	13
Photo Description:	Sand filter not in use and being bypassed.
Photo Location:	26°22'28.4"N 81°45'07.5"W



Image #:	14
Photo Description:	View of RO Pre-filter; 5-micron sediment.
Photo Location:	26°22'28.5"N 81°45'07.3"W

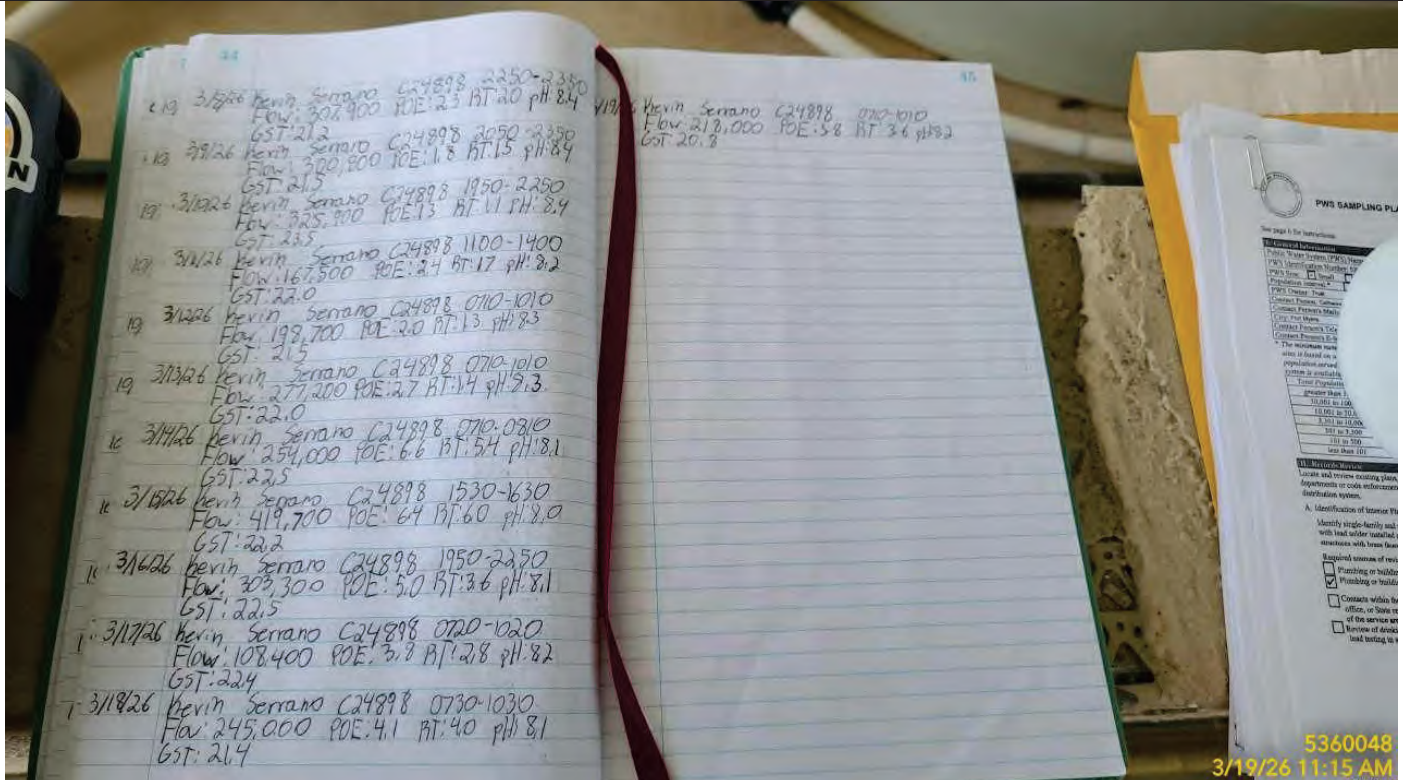


Inspection Photos

Image #:	15
Photo Description:	RO transfer feed pump.
Photo Location:	26°22'28.3"N 81°45'07.3"W



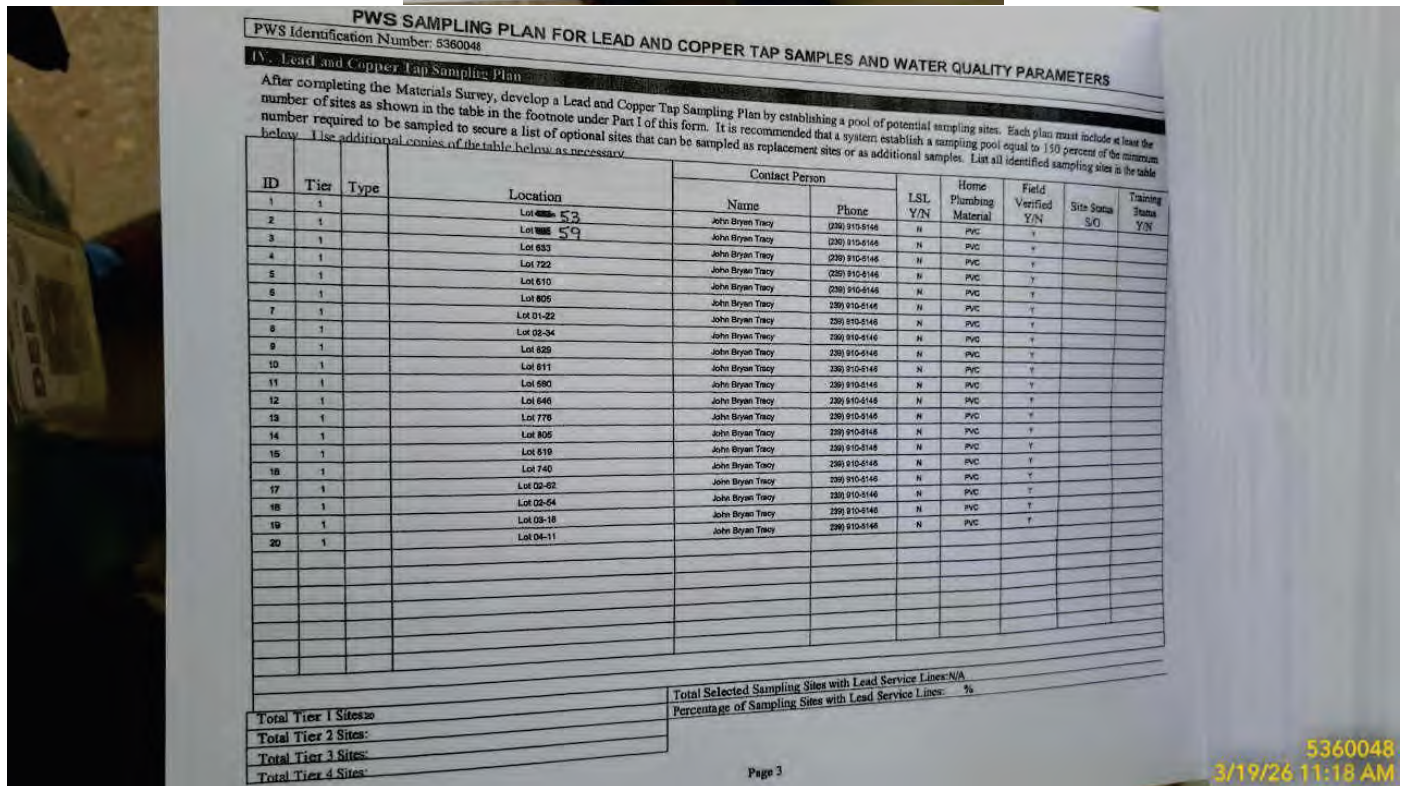
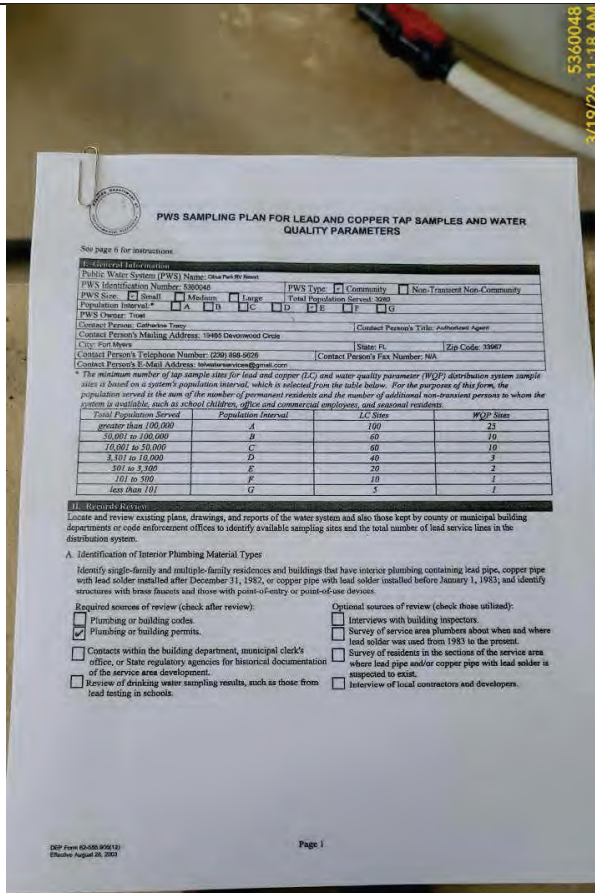
Image #:	16
Photo Description:	Logbook.
Photo Location:	26°22'28.5"N 81°45'07.7"W



Inspection Date: March 19, 2026
Inspectors: Megan Torres

Inspection Photos

Image #:	17
Photo Description:	Lead and copper sampling plan contains outdated contact information.
Photo Location:	26°22'28.4"N 81°45'07.8"W



Inspection Date: March 19, 2026
Inspectors: Megan Torres

Inspection Photos

Image #:	18
Photo Description:	DBP sampling plan needs to be updated to reflect quarterly sampling.
Photo Location:	26°22'28.4"N 81°45'07.8"W

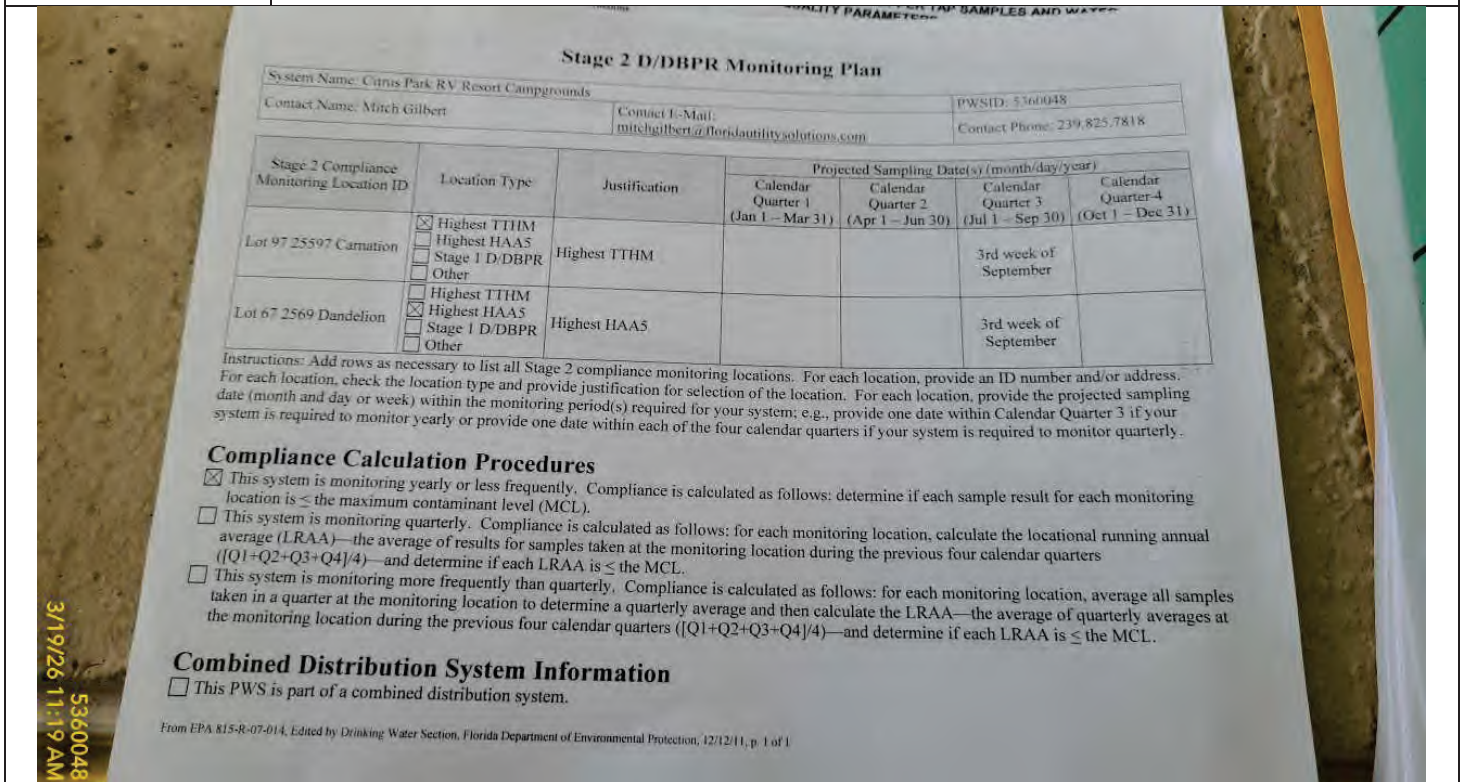
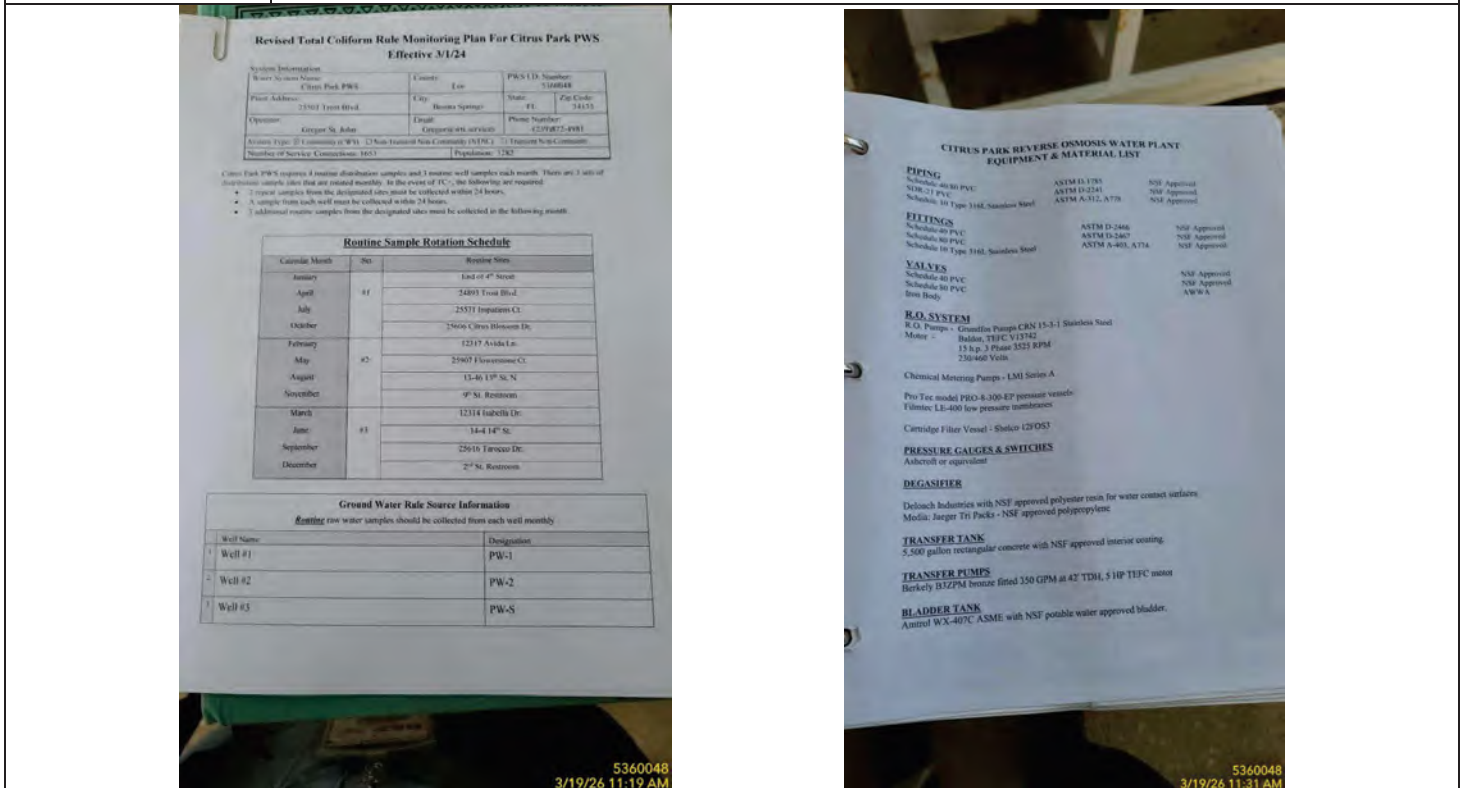


Image #:	19
Photo Description:	Bacteriological sampling plan and O&M Manual.
Photo Location:	26°22'28.3"N 81°45'08.0"W



Inspection Date: March 19, 2026
Inspectors: Megan Torres

Inspection Photos

Image #:	20
Photo Description:	Flow meter calibration and Emergency Response Plan.
Photo Location:	26°22'28.4"N 81°45'07.7"W

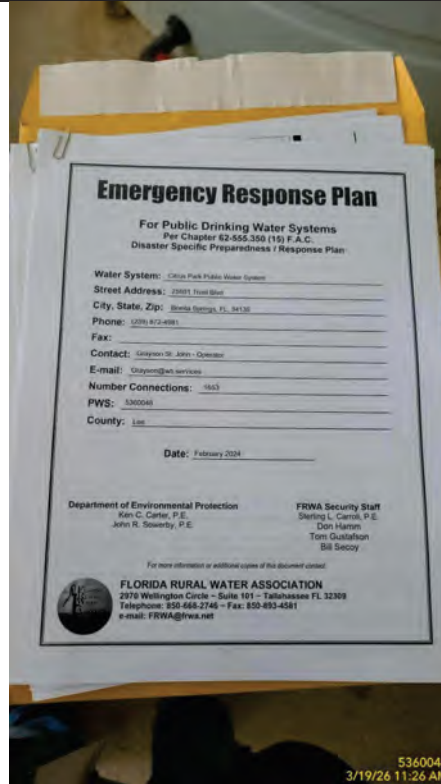


Image #:	21
Photo Description:	Ground storage tank cleaning report.
Photo Location:	26°22'28.4"N 81°45'07.7"W



Inspection Date: March 19, 2026
Inspectors: Megan Torres

Inspection Photos

Image #:	22
Photo Description:	View of generator on site.
Photo Location:	26°22'28.1"N 81°45'07.3"W



Image #:	23
Photo Description:	View of 3 high service pumps.
Photo Location:	26°22'27.8"N 81°45'07.4"W

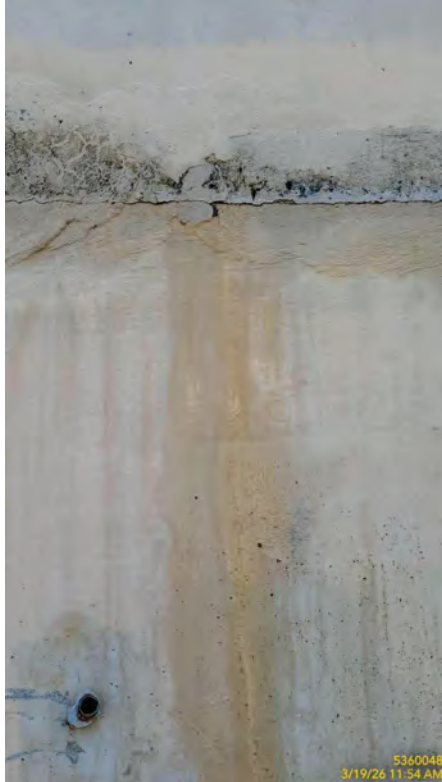


Inspection Photos

Image #:	24
Photo Description:	High service pump 1 has a pipe leaking.
Photo Location:	26°22'28.0"N 81°45'07.4"W



Image #:	25
Photo Description:	Clearwell's exterior has cracks and is leaking.
Photo Location:	26°22'28.5"N 81°45'07.7"W



Inspection Photos

Image #:	26
Photo Description:	Continued view of leaking on clearwell.
Photo Location:	26°22'28.7"N 81°45'07.7"W

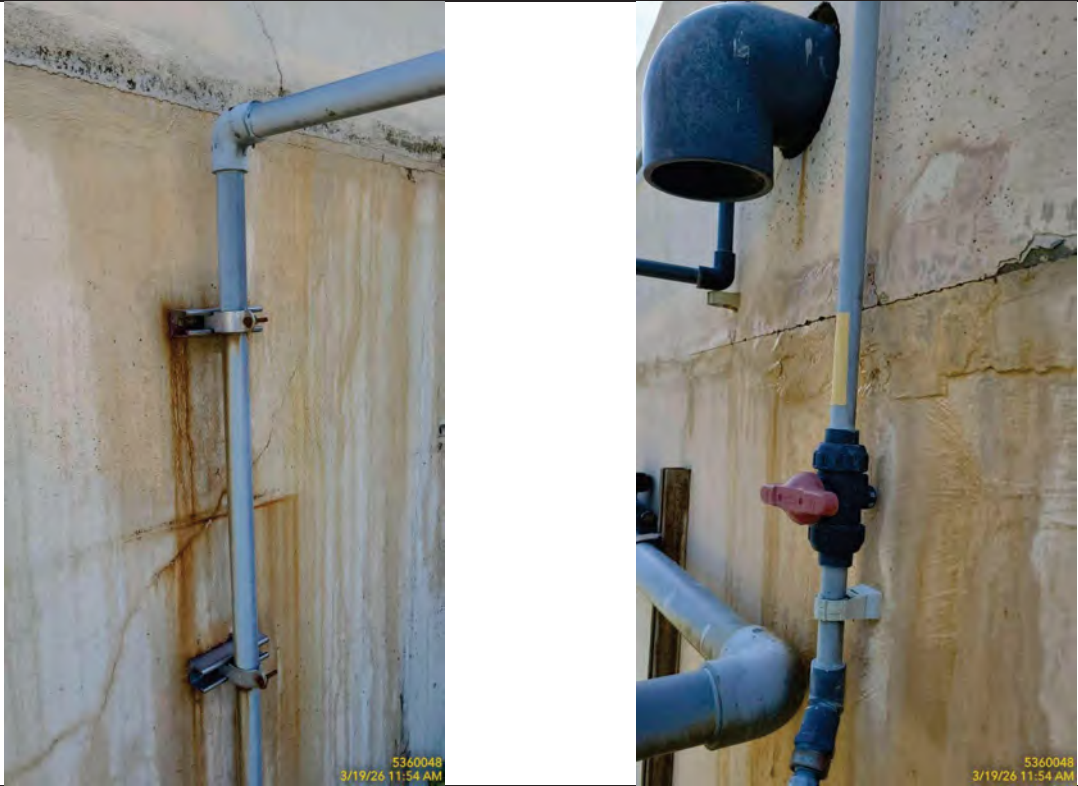
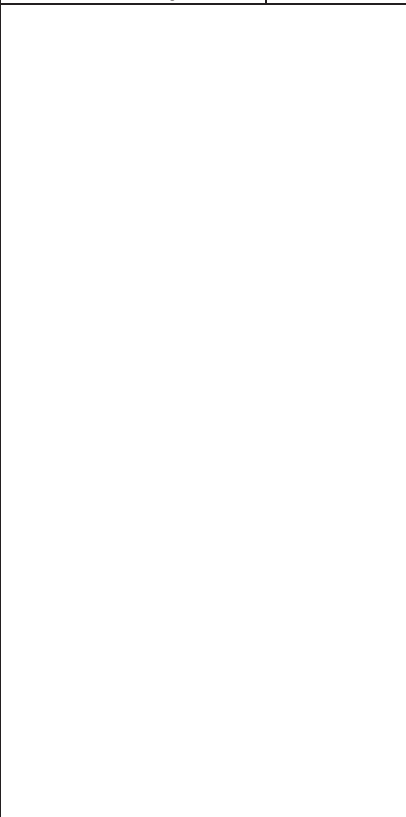

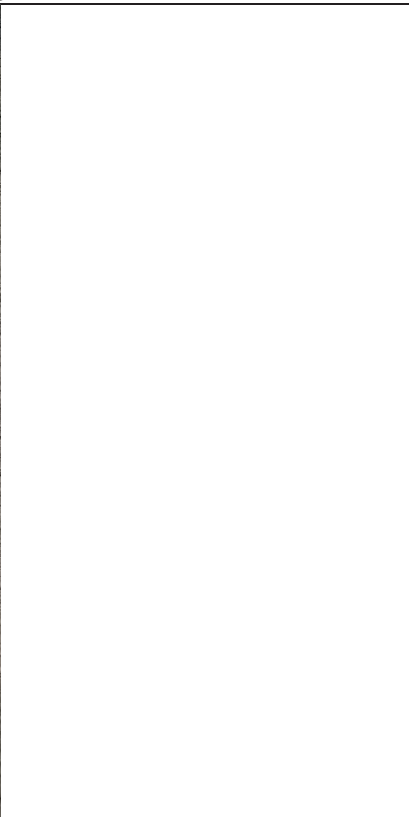
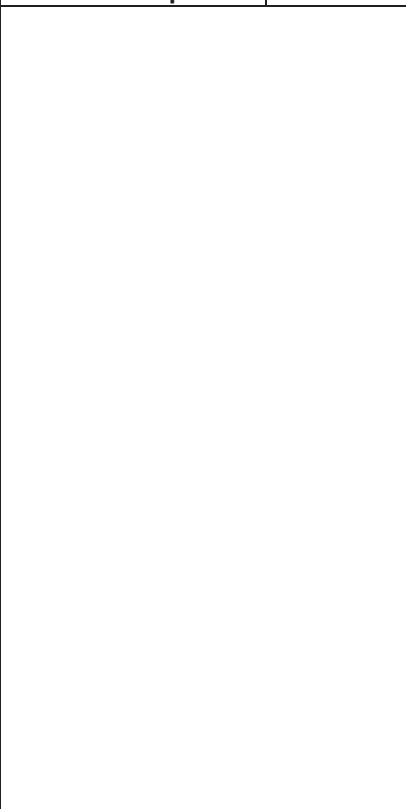




Image #:	27
Photo Description:	Remote chlorine sample at 2nd St. comfort station.
Photo Location:	26°22'17.0"N 81°44'54.9"W



Inspection Photos

Image #:	28	
Photo Description:	Submitted correction: 2 nd Street Comfort station residual 3.0 mg/L.	
		
Image #:	29	
Photo Description:	Submitted correction: POE residual 3.0 mg/L.	
		



PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

See page 6 for instructions.

I. General Information			
Public Water System (PWS) Name:			
PWS Identification Number:		PWS Type: <input type="checkbox"/> Community <input type="checkbox"/> Non-Transient Non-Community	
PWS Size: <input type="checkbox"/> Small <input type="checkbox"/> Medium <input type="checkbox"/> Large		Total Population Served:	
Population Interval:* <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input type="checkbox"/> F <input type="checkbox"/> G			
PWS Owner:			
Contact Person:		Contact Person's Title:	
Contact Person's Mailing Address:			
City:		State:	Zip Code:
Contact Person's Telephone Number:		Contact Person's Fax Number:	
Contact Person's E-Mail Address:			

* The minimum number of tap sample sites for lead and copper (LC) and water quality parameter (WQP) distribution system sample sites is based on a system's population interval, which is selected from the table below. For the purposes of this form, the population served is the sum of the number of permanent residents and the number of additional non-transient persons to whom the system is available, such as school children, office and commercial employees, and seasonal residents.

Total Population Served	Population Interval	LC Sites	WQP Sites
<i>greater than 100,000</i>	<i>A</i>	<i>100</i>	<i>25</i>
<i>50,001 to 100,000</i>	<i>B</i>	<i>60</i>	<i>10</i>
<i>10,001 to 50,000</i>	<i>C</i>	<i>60</i>	<i>10</i>
<i>3,301 to 10,000</i>	<i>D</i>	<i>40</i>	<i>3</i>
<i>501 to 3,300</i>	<i>E</i>	<i>20</i>	<i>2</i>
<i>101 to 500</i>	<i>F</i>	<i>10</i>	<i>1</i>
<i>less than 101</i>	<i>G</i>	<i>5</i>	<i>1</i>

II. Records Review

Locate and review existing plans, drawings, and reports of the water system and also those kept by county or municipal building departments or code enforcement offices to identify available sampling sites and the total number of lead service lines in the distribution system.

A. Identification of Interior Plumbing Material Types

Identify single-family and multiple-family residences and buildings that have interior plumbing containing lead pipe, copper pipe with lead solder installed after December 31, 1982, or copper pipe with lead solder installed before January 1, 1983; and identify structures with brass faucets and those with point-of-entry or point-of-use devices.

Required sources of review (check after review):

- Plumbing or building codes.
- Plumbing or building permits.
- Contacts within the building department, municipal clerk's office, or State regulatory agencies for historical documentation of the service area development.
- Review of drinking water sampling results, such as those from lead testing in schools.

Optional sources of review (check those utilized):

- Interviews with building inspectors.
- Survey of service area plumbers about when and where lead solder was used from 1983 to the present.
- Survey of residents in the sections of the service area where lead pipe and/or copper pipe with lead solder is suspected to exist.
- Interview of local contractors and developers.

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

PWS Identification Number: _____

B. Identification of Lead Service Lines and Components with Lead Content

Identify the number and location of lead service lines and identify the location of water distribution system components that contain lead.

Required sources of review (check after review):

- Distribution system maps and record drawings.
- Information collected on the presence of lead and copper as required under 40 CFR 141.42, Special Monitoring for Corrosivity Characteristics.
- Capital improvement plans or master plans for distribution system development.
- Current and historical standard operating procedures or operation and maintenance manuals for the type of materials used to install service connections.
- Utility records, including meter installation records, customer complaint investigations, and other historical documents, that indicate or confirm the location of lead service connections.
- Drinking water sampling results that indicate that a structure is susceptible to lead in drinking water.

Optional sources of review (check those utilized):

- Interviews with utility employees familiar with past construction practices.
- Service line sampling where lead service lines are suspected to exist but their presence is not otherwise confirmed.
- Review of permit files.
- A community survey.
- Interview of local pipe suppliers, contractors, and developers.

III. Materials Survey

Fill out the following Materials Survey Summary Table to summarize the results of the records review performed under Part II of this form to identify a sampling pool of lead and copper tap sampling sites.

Materials Survey Summary	Type of Structure Being Served		
	SFRs	MFRs	BLDGs
	Number of Service Connections		
A. Interior Plumbing Material Sites			
Lead Pipe			
Copper Pipe With Lead Solder Installed After 1982			
Copper Pipe With Lead Solder Installed Before 1983			
Brass Faucets			
Point-of-Use or Point-of-Entry Treatment Devices			
Lead-Lined Water Coolers			
Other Lead Plumbing Components			
B. Lead Service Line Sites			
Total Initial Number of Lines that Are Entirely Lead and Subject to Replacement			
Partial Lead Lines	Goosenecks		
	Pigtails		
C. Lead Distribution System Component Sites			
Service Connections Within 100 feet of Distribution System Components Containing Lead			
D. Total No. of Service Connections to Available Sampling Sites			
E. Total Number of Service Connections in Distribution System			

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

PWS Identification Number: _____

VI. Certification

A. Site Selection Criteria

Whenever possible, lead and copper tap sample plans must include tier 1 sites exclusively. Explain the selection of other than tier 1 sites; and if sites were changed from one monitoring period to another, explain why the sites were changed (attach additional pages if necessary).

B. Lead Service Line Sites

When lead service line sites are identified, they must comprise at least 50 percent of the selected samples. Explain why the percentage of lead service line sites is not at least 50 percent of the required number of sampling sites (attach additional pages if necessary).

C. Water Quality Parameter Sampling Plan

If any WQP distribution system sampling sites are not also microbiological sampling sites, explain how the selected WQP distribution system sampling sites represent water quality throughout the distribution system based on the distribution of population, the different sources of water and treatment methods, and an even distribution of sampling throughout the six-month sampling period (attach additional sheets as necessary).

I am duly authorized to sign this form on behalf of the PWS identified in Part I of this form. I certify that the information provided on this form is true and accurate to the best of my knowledge and belief. I certify that the information listed and checked in Part II of this form was used to perform the materials survey in order to identify the total number of lead service lines in the PWS and to establish the sampling pool and sampling plans. I also certify that the number of lead service lines reported in Part III of this form is the total known number of lead service lines in the PWS and that the selected sampling sites in Part IV of this form are the highest risk sites available.

Signature and Date

Printed or Typed Name

Title

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

INSTRUCTIONS: This form shall be completed and submitted by community water systems (CWSs) and by non-transient non-community water systems (NTNCWSs). Complete all parts of this form, attach any maps and written narrative describing the sampling plan, and submit the completed form and any attachments to the appropriate Department of Environmental Protection (DEP) District Office or Approved County Health Department (ACHD) 30 DAYS PRIOR TO THE BEGINNING OF A SIX-MONTH MONITORING PERIOD FOR LEAD AND COPPER IN DRINKING WATER. All information provided on this form shall be typed or printed in ink. The DEP District Office or ACHD will notify a system of approval of a Sampling Plan in writing, which will provide the system notice to proceed. Submit a revised Sampling Plan using this form if any changes in the selection of sampling sites must be made. When no changes have been made, no resubmission is necessary prior to sampling during the next six-month sampling period.

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

In A and B, show, by type of structure being served (i.e., single-family residences [SFR], multiple-family residences [MFR], or other buildings [BLDG]), the number of service connections to sites having the listed interior plumbing material characteristics or the listed service line characteristics. In C, show, by type of structure being served, the number of service connections within 100 feet of distribution system components containing lead. In D, show, by type of structure being served, the total number of service connections to available sampling sites. In E, show, by type of structure being served, the total number of service connections in the distribution system.

The following specific instructions are for the table in Part IV of this form.

ID. Enter a site identification number of up to three digits.

TIER. Enter the tier number of each site. Lead and copper tap sampling sites are categorized as tier 1, for the highest risk, to tier 2, 3, or 4 for successively lower risks. The tier categories are different for CWSs and NTNCWSs. For CWSs, tier 1 sites are single-family residences or child care facilities that contain either: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. Multiple-family residences are tier 1 when they comprise at least 20 percent of the structures served by the system. For CWSs, tier 2 sites include buildings and multiple-family residences that contain: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. For CWSs, tier 3 sites consist of single-family residences that contain copper pipe with lead solder installed before January 1, 1983. For CWSs, tier 4 sites are those that are identified as susceptible to lead or copper contamination but not belonging to one of the other tiers. For NTNCWSs, tier 1 sites are buildings that contain: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. For NTNCWSs, tier 2 sites are buildings that contain copper pipe with lead solder installed before January 1, 1983. For NTNCWSs, tier 3 sites are those identified as susceptible to lead or copper contamination and are the same as CWS tier 4 sites. When too few tier 1 sites are identified, tier 2 sites must be located to develop the sampling plan and so on through tiers 3 and 4.

TYPE, LOCATION, and CONTACT PERSON. Enter the type of structure in the Type column. Site types are identified as a single-family residence (SFR), a multiple-family residence (MFR), or a building (BLDG). Enter the street address of the site in the Location column and the name and phone number of the building or residence owner in the Contact Person column.

LSL and HOME PLUMBING MATERIAL. Enter a "Y" in the LSL column to identify a site with a lead service line. The plumbing material must be identified for each site in the Home Plumbing Material column. Enter one of the following:

- "Pb1" to identify a site with lead solder installed after December 31, 1982;
- "Pb2" to identify a site with lead solder installed before January 1, 1983;
- "LP" to identify a site with lead pipe;
- "BF" to identify tier 4 sites (tier 3 for NTNCWSs) that have brass faucets;
- "WC" to identify tier 4 sites that have water coolers with lead content;
- "POE" or "POU" to identify tier 4 sites that have a point-of-entry or point-of-use treatment device, respectively; or
- "LC" to identify a tier 4 site within 100 feet of a lead component in the distribution system.

FIELD VERIFIED, SITE STATUS, and TRAINING STATUS. Show if the site's home plumbing or service line material has been field verified by a "Y" in the Field Verified column. Sites selected for sampling should be indicated by entering an "S" in the Site Status column. Optional sites are identified by an "O." To be a selected site, there must be an agreement with the site building owner to sample himself or to have the site sampled by the system. All homeowners who will sample at the selected sites must receive training in sampling procedures. Indicate which homeowners have received training by a "Y" in the Training Status column.

The following specific instructions are for the table in Part V of this form.

ID NUMBER. Use a two-digit number as an identification number.

LOCATION. The street address should be given as the site location.

TARGET DATES. List target sampling dates for the two required sampling rounds to demonstrate how sampling will evaluate seasonal water quality differences.

Stage 2 D/DBPR Monitoring Plan

System Name:		PWSID:
Contact Name:	Contact E-Mail:	Contact Phone:

Stage 2 Compliance Monitoring Location ID	Location Type	Justification	Projected Sampling Date(s) (day, week, or month)			
			Calendar Quarter 1 (Jan 1 – Mar 31)	Calendar Quarter 2 (Apr 1 – Jun 30)	Calendar Quarter 3 (Jul 1 – Sep 30)	Calendar Quarter-4 (Oct 1 – Dec 31)
	<input type="checkbox"/> Highest TTHM <input type="checkbox"/> Highest HAA5 <input type="checkbox"/> Stage 1 D/DBPR <input type="checkbox"/> Other					
	<input type="checkbox"/> Highest TTHM <input type="checkbox"/> Highest HAA5 <input type="checkbox"/> Stage 1 D/DBPR <input type="checkbox"/> Other					

Instructions: Add rows as necessary to list all Stage 2 compliance monitoring locations. For each location, provide an ID number and/or address. For each location, check the location type and provide justification for selection of the location. For each location, provide the projected sampling date (day, week, or month) within the monitoring period(s) required for your system; e.g., provide one date within Calendar Quarter 3 if your system is required to monitor yearly or provide one date within each of the four calendar quarters if your system is required to monitor quarterly.

Compliance Calculation Procedures

- This system is monitoring yearly or less frequently. Compliance is calculated as follows: If sample result for each monitoring location is \leq the maximum contaminant level (MCL), the system is in compliance. If sample result for any monitoring location is $>$ MCL, system is placed on quarterly monitoring starting with the current quarter.
- This system is monitoring quarterly. Compliance is calculated as follows: for each monitoring location, calculate the locational running annual average (LRAA)—the average of results for samples taken at the monitoring location during the previous four calendar quarters $([Q1+Q2+Q3+Q4]/4)$ —and determine if each LRAA is \leq the MCL.
- This system is monitoring more frequently than quarterly. Compliance is calculated as follows: for each monitoring location, average all samples taken in a quarter at the monitoring location to determine a quarterly average and then calculate the LRAA—the average of quarterly averages at the monitoring location during the previous four calendar quarters $([Q1+Q2+Q3+Q4]/4)$ —and determine if each LRAA is \leq the MCL.

Combined Distribution System Information

- This PWS is part of a combined distribution system.

Stage 2 D/DBPR Monitoring Plan

System Name:		PWSID:	
Contact Name:	Contact E-Mail:	Contact Phone:	

Stage 2 Compliance Monitoring Location ID	Location Type	Justification	Projected Sampling Date(s) (day, week, or month)			
			Calendar Quarter 1 (Jan 1 – Mar 31)	Calendar Quarter 2 (Apr 1 – Jun 30)	Calendar Quarter 3 (Jul 1 – Sep 30)	Calendar Quarter-4 (Oct 1 – Dec 31)
	<input type="checkbox"/> Highest TTHM <input type="checkbox"/> Highest HAA5 <input type="checkbox"/> Stage 1 D/DBPR <input type="checkbox"/> Other					
	<input type="checkbox"/> Highest TTHM <input type="checkbox"/> Highest HAA5 <input type="checkbox"/> Stage 1 D/DBPR <input type="checkbox"/> Other					

Instructions: Add rows as necessary to list all Stage 2 compliance monitoring locations. For each location, provide an ID number and/or address. For each location, check the location type and provide justification for selection of the location. For each location, provide the projected sampling date (day, week, or month) within the monitoring period(s) required for your system; e.g., provide one date within Calendar Quarter 3 if your system is required to monitor yearly or provide one date within each of the four calendar quarters if your system is required to monitor quarterly.

Compliance Calculation Procedures

- This system is monitoring yearly or less frequently. Compliance is calculated as follows: If sample result for each monitoring location is \leq the maximum contaminant level (MCL), the system is in compliance. If sample result for any monitoring location is $>$ MCL, system is placed on quarterly monitoring starting with the current quarter.
- This system is monitoring quarterly. Compliance is calculated as follows: for each monitoring location, calculate the locational running annual average (LRAA)—the average of results for samples taken at the monitoring location during the previous four calendar quarters $([Q1+Q2+Q3+Q4]/4)$ —and determine if each LRAA is \leq the MCL.
- This system is monitoring more frequently than quarterly. Compliance is calculated as follows: for each monitoring location, average all samples taken in a quarter at the monitoring location to determine a quarterly average and then calculate the LRAA—the average of quarterly averages at the monitoring location during the previous four calendar quarters $([Q1+Q2+Q3+Q4]/4)$ —and determine if each LRAA is \leq the MCL.

Combined Distribution System Information

- This PWS is part of a combined distribution system.

ATTACHMENT 4

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Date: Thursday, March 19, 2026 at 4:57 PM

To: Grayson St. John <monitoring@wti.services>, Mark Nicklas <mnicklas@murexproperties.com>, Eric Zimmerman <ezimmerman@murexproperties.com>, Licenses <licenses@murexproperties.com>, Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Thank you for sending that in Grayson. Below is a list of the deficiencies found on site. This is not a final list, as my consultants could find more deficiencies when reviewing my report. Feel free to send corrections in as they are completed. I have 2 weeks to send the report to my consultant for review. Any corrections will be included on the report within that 2-ish week timeframe.

- Lead and Copper sampling plan is not up to date for operator information. I've attached a new template to this email.
- DBP sampling plan is not up to date with new quarterly sampling timeframe. Template is attached to this email.
- Grayson, please send in the updated Certificate of Delivery for the DBP MCL violation showing the public notice was hand or mail delivered to residents.
- Chlorine residuals were over 4.0 mg/L for the point of entry and two remote sample locations. Please have photos sent of the residual once it is within 0.6 mg/L – 4.0 mg/L range.
- Please send the invoice for the new chlorine meter that was purchased.
- Facility will need to conduct a Capacity Analysis Report (CAR) because MOR's document an exceedance of 75% of the design capacity for several months. The rule for the CAR is 62-555.348 F.A.C. Florida Rural Water Association (FRWA) may be able to help out with this one.
- There was no generator logbook documenting maintenance / when it is being exercised.
- Leak at high service pump 1.
- No cross-connection control plan on site. Rule: 62-555.360(2) F.A.C.
- Clearwell has cracks and is leaking.

Let me know if you have any questions. Thank you,



Megan Torres

Florida Department of Environmental
Protection

South District Potable Water Compliance
Environmental Specialist III

Megan.Torres@FloridaDEP.gov

Office: 239-344-5670

From: Grayson St. John <monitoring@wti.services>

Sent: Thursday, March 19, 2026 11:38 AM

To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman

<ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: Re: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Hello,

Attached is the map of the water system for Citrus Park PWS#5360048

-Grayson

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Sent: Thursday, March 12, 2026 3:05:32 PM

To: Grayson St. John <monitoring@wti.services>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Good afternoon,

Below is a list of documentation I will be looking for during my inspection of Citrus Park (Bonita Terra) PWS 5360048. Please feel free to send any paperwork such as sampling plans before the inspection.

- O&M Logbook
- O&M Manual
- MORs
- Treatment process performance records if using any of the following treatments: RO, Nanofiltration, Ion exchange, filtration, coagulation/flocculation, and softening.
- Tank cleaning reports. Aerators are to be flushed and cleaned annually and finished water storage tanks are inspected and cleaned every 5 years by a licensed engineer.
- Isolation Valve Exercising records/plan
- Flushing Program/Records
- Primary (annual) and secondary (daily) chlorine meter calibration records along with the secondary standards, chlorine packets, and the actual meter.
- Emergency Response plan
- Cross Connection Control plan
- Lead and Copper sampling plan
- Bacteriological sampling plan
- Disinfection By-Product plan
- Auxiliary Power Maintenance (records showing it is being exercised)
- Flow meter calibration records (once every 5 years)

I look forward to meeting with you all. Thank you,



Megan Torres

Florida Department of Environmental
Protection
South District Potable Water Compliance
Environmental Specialist III
Megan.Torres@FloridaDEP.gov
Office: 239-344-5670

From: Grayson St. John <monitoring@wti.services>

Sent: Thursday, March 5, 2026 3:47 PM

To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: Re: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Megan,

I would like to confirm March 19th @ 10AM for the Citrus Park PWS inspection.

-Grayson

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Sent: Thursday, February 26, 2026 9:08 AM

To: Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Good morning Mark,

If we could, I'd like to begin the inspection at 10 am. I would like to point out the CAO Letter sent on February 2, 2026, indicates the MCL was exceeded for DBPs during the last sampling event in September. The facility will need to sample quarterly until there are 4 consecutive quarters below the MCL. A public notice must be posted within 30 days of receiving the letter, which is March 4, 2026.

Thank you,



Megan Torres

Florida Department of Environmental
Protection
South District Potable Water Compliance
Environmental Specialist III
Megan.Torres@FloridaDEP.gov
Office: 239-344-5670

From: Mark Nicklas <mnicklas@murexproperties.com>

Sent: Wednesday, February 25, 2026 5:35 PM

To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Dear Ms. Torres

Yes, the date of Thursday, March 19 will work. Do you have a time that you would like to get started for the inspection?

Mark Nicklas
General Manager

Bonita Terra
25581 Trost Blvd.
Bonita Springs, FL 34135
(239) 992-3030 x 150
mnicklas@murexproperties.com

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From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Sent: Monday, February 23, 2026 3:12 PM

To: Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>; Mark Nicklas <mnicklas@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>

Subject: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Some people who received this message don't often get email from megan.torres@floridadep.gov. [Learn why this is important](#)

Good afternoon,

I am contacting you to notify that **Citrus Park RV Resort (Bonita Terra) PWS 5360048** is due to undergo a **Sanitary Survey** this year. The department will review the facility to ensure that it remains in compliance with the expectations put forth by regulatory codes. In adherence to these codes, the following plant features will be inspected: the water source, facilities, equipment, operation, maintenance, and monitoring compliance.

I have provided a date below during which I would be available to conduct this survey. Please let me know if this date works for you, or provide alternative dates as needed:

? **Thursday March 19, 2026**

If there are any questions regarding this process, please feel free to reach out and I will assist in any way possible. I look forward to hearing back soon.

Thank you for your time and attention.



Megan Torres

Florida Department of Environmental Protection

South District Potable Water Compliance
Environmental Specialist III

Megan.Torres@FloridaDEP.gov

Office: 239-344-5670

TTHM and HAA5 MCL Violation Notice

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

Total Trihalomethanes (TTHM) and Haloacetic Acids (HAA5) MCL Violation at Public Water System of Bonita Terra

Our water system recently violated a drinking water standard. Although this incident was not an emergency, as our customers, you have a right to know what happened and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Annual testing results from September 2025 show that our system exceeds the standard, or maximum contaminant level (MCL), for TTHM and HAA5. The standard is 80 µg/L for TTHM and 60 µg/L for HAA5. The results at one of our system's locations in September 2025 was 253.95 µg/L for TTHM and 161.77 µg/L for HAA5.

What should I do?

- There is nothing you need to do. You do not need to boil your water or take other corrective actions. If a situation arises where the water is no longer safe to drink, you will be notified within 24 hours.
- If you have a severely compromised immune system, have an infant, are pregnant, or are elderly, you may be at increased risk and should seek advice from your healthcare providers about drinking this water.

What does this mean?

This is not an emergency. If it had been an emergency, you would have been notified within 24 hours.

TTHM are four volatile organic chemicals and HAA5 are five haloacetic acid compounds which form when disinfectants react with natural organic matter in the water.

People who drink water containing trihalomethanes in excess of the MCL over many years may experience problems with their liver, kidneys, or central nervous system, and may have an increased risk of getting cancer. People who drink water containing haloacetic acids in excess of the MCL over many years may have an increased risk of getting cancer.

What is being done?

Monitoring frequency will be increased to quarterly. Additional flushing will be conducted to reduce levels of TTHM and HAA5.

For more information, please contact Gregor St. John at (239) 872-4981 or monitoring@wti.services

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by Citrus Park Public Water System. State Water System ID#: 5360048.

Date distributed: 2/26/2026



PWS CERTIFICATION OF DELIVERY OF PUBLIC NOTICE

INSTRUCTIONS: The supplier of water, within ten days of completion of each public notification requirement pursuant to Part IV of Chapter 62-560, Florida Administrative Code, shall submit to the appropriate Department of Environmental Protection District Office or Approved County Health Department a completed DEP Form 62-555.900(22), Certification of Delivery of Public Notice, and include with the form a representative copy of each type of notice distributed, published, posted, and made available to the persons served by the system, and the media. All information provided on this form shall be typed or printed in ink.

I. General Information		
Public Water System (PWS) Name: Citrus Park Public Water System		
PWS ID: 5360048		
PWS Type: <input checked="" type="checkbox"/> Community <input type="checkbox"/> Non-Transient Non-Community <input type="checkbox"/> Transient Non-Community		
PWS Owner: CPI Citrus Park Utility		
Contact Person: Grayson St. John	Contact Person's Title: Operator	
Contact Person's Mailing Address: 3700 Fort Denaud Rd		
City: LaBelle	State: FL	Zip Code: 33935
Contact Person's Telephone Number: 863 517-2520	Contact Person's Fax Number:	
Contact Person's E-Mail Address: grayson@wti.services		

II. Certification		
For Violation/Situation: Tier 2 public notice for TTHM and HAA5 exceedance of MCL during annual DBP monitoring		
Date of Occurrence: September 2025		
Consultation Date 02/02/2026		
Delivery Methods:	<input type="checkbox"/> Radio/TV	<input type="checkbox"/> Mail <input type="checkbox"/> Newspaper <input checked="" type="checkbox"/> Hand Delivery <input checked="" type="checkbox"/> Posting <input type="checkbox"/> Other(describe)
Delivery Date/s:		03/11/2026 02/26/2026

I am duly authorized to sign this form on behalf of the public water system identified in Part I of this form. I certify that the information provided on this form is correct to the best of my knowledge and that public notice has been provided to consumers in accordance with the delivery, content, and format requirements and deadlines in Chapter 62-560, Florida Administrative Code.

	3/11/26	Grayson St. John	Operator
Signature and Date		Printed or Typed Name	Title

Stage 2 D/DBPR Monitoring Plan

System Name:		PWSID:	
Contact Name:	Contact E-Mail:	Contact Phone:	

Stage 2 Compliance Monitoring Location ID	Location Type	Justification	Projected Sampling Date(s) (day, week, or month)			
			Calendar Quarter 1 (Jan 1 – Mar 31)	Calendar Quarter 2 (Apr 1 – Jun 30)	Calendar Quarter 3 (Jul 1 – Sep 30)	Calendar Quarter-4 (Oct 1 – Dec 31)
	<input type="checkbox"/> Highest TTHM <input type="checkbox"/> Highest HAA5 <input type="checkbox"/> Stage 1 D/DBPR <input type="checkbox"/> Other					
	<input type="checkbox"/> Highest TTHM <input type="checkbox"/> Highest HAA5 <input type="checkbox"/> Stage 1 D/DBPR <input type="checkbox"/> Other					

Instructions: Add rows as necessary to list all Stage 2 compliance monitoring locations. For each location, provide an ID number and/or address. For each location, check the location type and provide justification for selection of the location. For each location, provide the projected sampling date (day, week, or month) within the monitoring period(s) required for your system; e.g., provide one date within Calendar Quarter 3 if your system is required to monitor yearly or provide one date within each of the four calendar quarters if your system is required to monitor quarterly.

Compliance Calculation Procedures

- This system is monitoring yearly or less frequently. Compliance is calculated as follows: If sample result for each monitoring location is \leq the maximum contaminant level (MCL), the system is in compliance. If sample result for any monitoring location is $>$ MCL, system is placed on quarterly monitoring starting with the current quarter.
- This system is monitoring quarterly. Compliance is calculated as follows: for each monitoring location, calculate the locational running annual average (LRAA)—the average of results for samples taken at the monitoring location during the previous four calendar quarters $([Q1+Q2+Q3+Q4]/4)$ —and determine if each LRAA is \leq the MCL.
- This system is monitoring more frequently than quarterly. Compliance is calculated as follows: for each monitoring location, average all samples taken in a quarter at the monitoring location to determine a quarterly average and then calculate the LRAA—the average of quarterly averages at the monitoring location during the previous four calendar quarters $([Q1+Q2+Q3+Q4]/4)$ —and determine if each LRAA is \leq the MCL.

Combined Distribution System Information

- This PWS is part of a combined distribution system.



PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

See page 6 for instructions.

I. General Information			
Public Water System (PWS) Name:			
PWS Identification Number:		PWS Type: <input type="checkbox"/> Community <input type="checkbox"/> Non-Transient Non-Community	
PWS Size: <input type="checkbox"/> Small <input type="checkbox"/> Medium <input type="checkbox"/> Large		Total Population Served:	
Population Interval:* <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input type="checkbox"/> F <input type="checkbox"/> G			
PWS Owner:			
Contact Person:		Contact Person's Title:	
Contact Person's Mailing Address:			
City:		State:	Zip Code:
Contact Person's Telephone Number:		Contact Person's Fax Number:	
Contact Person's E-Mail Address:			

* The minimum number of tap sample sites for lead and copper (LC) and water quality parameter (WQP) distribution system sample sites is based on a system's population interval, which is selected from the table below. For the purposes of this form, the population served is the sum of the number of permanent residents and the number of additional non-transient persons to whom the system is available, such as school children, office and commercial employees, and seasonal residents.

Total Population Served	Population Interval	LC Sites	WQP Sites
<i>greater than 100,000</i>	<i>A</i>	<i>100</i>	<i>25</i>
<i>50,001 to 100,000</i>	<i>B</i>	<i>60</i>	<i>10</i>
<i>10,001 to 50,000</i>	<i>C</i>	<i>60</i>	<i>10</i>
<i>3,301 to 10,000</i>	<i>D</i>	<i>40</i>	<i>3</i>
<i>501 to 3,300</i>	<i>E</i>	<i>20</i>	<i>2</i>
<i>101 to 500</i>	<i>F</i>	<i>10</i>	<i>1</i>
<i>less than 101</i>	<i>G</i>	<i>5</i>	<i>1</i>

II. Records Review

Locate and review existing plans, drawings, and reports of the water system and also those kept by county or municipal building departments or code enforcement offices to identify available sampling sites and the total number of lead service lines in the distribution system.

A. Identification of Interior Plumbing Material Types

Identify single-family and multiple-family residences and buildings that have interior plumbing containing lead pipe, copper pipe with lead solder installed after December 31, 1982, or copper pipe with lead solder installed before January 1, 1983; and identify structures with brass faucets and those with point-of-entry or point-of-use devices.

Required sources of review (check after review):

- Plumbing or building codes.
- Plumbing or building permits.
- Contacts within the building department, municipal clerk's office, or State regulatory agencies for historical documentation of the service area development.
- Review of drinking water sampling results, such as those from lead testing in schools.

Optional sources of review (check those utilized):

- Interviews with building inspectors.
- Survey of service area plumbers about when and where lead solder was used from 1983 to the present.
- Survey of residents in the sections of the service area where lead pipe and/or copper pipe with lead solder is suspected to exist.
- Interview of local contractors and developers.

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

PWS Identification Number: _____

B. Identification of Lead Service Lines and Components with Lead Content

Identify the number and location of lead service lines and identify the location of water distribution system components that contain lead.

Required sources of review (check after review):

- Distribution system maps and record drawings.
- Information collected on the presence of lead and copper as required under 40 CFR 141.42, Special Monitoring for Corrosivity Characteristics.
- Capital improvement plans or master plans for distribution system development.
- Current and historical standard operating procedures or operation and maintenance manuals for the type of materials used to install service connections.
- Utility records, including meter installation records, customer complaint investigations, and other historical documents, that indicate or confirm the location of lead service connections.
- Drinking water sampling results that indicate that a structure is susceptible to lead in drinking water.

Optional sources of review (check those utilized):

- Interviews with utility employees familiar with past construction practices.
- Service line sampling where lead service lines are suspected to exist but their presence is not otherwise confirmed.
- Review of permit files.
- A community survey.
- Interview of local pipe suppliers, contractors, and developers.

III. Materials Survey

Fill out the following Materials Survey Summary Table to summarize the results of the records review performed under Part II of this form to identify a sampling pool of lead and copper tap sampling sites.

Materials Survey Summary	Type of Structure Being Served		
	SFRs	MFRs	BLDGs
	Number of Service Connections		
A. Interior Plumbing Material Sites			
Lead Pipe			
Copper Pipe With Lead Solder Installed After 1982			
Copper Pipe With Lead Solder Installed Before 1983			
Brass Faucets			
Point-of-Use or Point-of-Entry Treatment Devices			
Lead-Lined Water Coolers			
Other Lead Plumbing Components			
B. Lead Service Line Sites			
Total Initial Number of Lines that Are Entirely Lead and Subject to Replacement			
Partial Lead Lines	Goosenecks		
	Pigtails		
C. Lead Distribution System Component Sites			
Service Connections Within 100 feet of Distribution System Components Containing Lead			
D. Total No. of Service Connections to Available Sampling Sites			
E. Total Number of Service Connections in Distribution System			

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

PWS Identification Number: _____

VI. Certification

A. Site Selection Criteria

Whenever possible, lead and copper tap sample plans must include tier 1 sites exclusively. Explain the selection of other than tier 1 sites; and if sites were changed from one monitoring period to another, explain why the sites were changed (attach additional pages if necessary).

B. Lead Service Line Sites

When lead service line sites are identified, they must comprise at least 50 percent of the selected samples. Explain why the percentage of lead service line sites is not at least 50 percent of the required number of sampling sites (attach additional pages if necessary).

C. Water Quality Parameter Sampling Plan

If any WQP distribution system sampling sites are not also microbiological sampling sites, explain how the selected WQP distribution system sampling sites represent water quality throughout the distribution system based on the distribution of population, the different sources of water and treatment methods, and an even distribution of sampling throughout the six-month sampling period (attach additional sheets as necessary).

I am duly authorized to sign this form on behalf of the PWS identified in Part I of this form. I certify that the information provided on this form is true and accurate to the best of my knowledge and belief. I certify that the information listed and checked in Part II of this form was used to perform the materials survey in order to identify the total number of lead service lines in the PWS and to establish the sampling pool and sampling plans. I also certify that the number of lead service lines reported in Part III of this form is the total known number of lead service lines in the PWS and that the selected sampling sites in Part IV of this form are the highest risk sites available.

Signature and Date

Printed or Typed Name

Title

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

INSTRUCTIONS: This form shall be completed and submitted by community water systems (CWSs) and by non-transient non-community water systems (NTNCWSs). Complete all parts of this form, attach any maps and written narrative describing the sampling plan, and submit the completed form and any attachments to the appropriate Department of Environmental Protection (DEP) District Office or Approved County Health Department (ACHD) 30 DAYS PRIOR TO THE BEGINNING OF A SIX-MONTH MONITORING PERIOD FOR LEAD AND COPPER IN DRINKING WATER. All information provided on this form shall be typed or printed in ink. The DEP District Office or ACHD will notify a system of approval of a Sampling Plan in writing, which will provide the system notice to proceed. Submit a revised Sampling Plan using this form if any changes in the selection of sampling sites must be made. When no changes have been made, no resubmission is necessary prior to sampling during the next six-month sampling period.

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

In A and B, show, by type of structure being served (i.e., single-family residences [SFR], multiple-family residences [MFR], or other buildings [BLDG]), the number of service connections to sites having the listed interior plumbing material characteristics or the listed service line characteristics. In C, show, by type of structure being served, the number of service connections within 100 feet of distribution system components containing lead. In D, show, by type of structure being served, the total number of service connections to available sampling sites. In E, show, by type of structure being served, the total number of service connections in the distribution system.

The following specific instructions are for the table in Part IV of this form.

ID. Enter a site identification number of up to three digits.

TIER. Enter the tier number of each site. Lead and copper tap sampling sites are categorized as tier 1, for the highest risk, to tier 2, 3, or 4 for successively lower risks. The tier categories are different for CWSs and NTNCWSs. For CWSs, tier 1 sites are single-family residences or child care facilities that contain either: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. Multiple-family residences are tier 1 when they comprise at least 20 percent of the structures served by the system. For CWSs, tier 2 sites include buildings and multiple-family residences that contain: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. For CWSs, tier 3 sites consist of single-family residences that contain copper pipe with lead solder installed before January 1, 1983. For CWSs, tier 4 sites are those that are identified as susceptible to lead or copper contamination but not belonging to one of the other tiers. For NTNCWSs, tier 1 sites are buildings that contain: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. For NTNCWSs, tier 2 sites are buildings that contain copper pipe with lead solder installed before January 1, 1983. For NTNCWSs, tier 3 sites are those identified as susceptible to lead or copper contamination and are the same as CWS tier 4 sites. When too few tier 1 sites are identified, tier 2 sites must be located to develop the sampling plan and so on through tiers 3 and 4.

TYPE, LOCATION, and CONTACT PERSON. Enter the type of structure in the Type column. Site types are identified as a single-family residence (SFR), a multiple-family residence (MFR), or a building (BLDG). Enter the street address of the site in the Location column and the name and phone number of the building or residence owner in the Contact Person column.

LSL and HOME PLUMBING MATERIAL. Enter a "Y" in the LSL column to identify a site with a lead service line. The plumbing material must be identified for each site in the Home Plumbing Material column. Enter one of the following:

- "Pb1" to identify a site with lead solder installed after December 31, 1982;
- "Pb2" to identify a site with lead solder installed before January 1, 1983;
- "LP" to identify a site with lead pipe;
- "BF" to identify tier 4 sites (tier 3 for NTNCWSs) that have brass faucets;
- "WC" to identify tier 4 sites that have water coolers with lead content;
- "POE" or "POU" to identify tier 4 sites that have a point-of-entry or point-of-use treatment device, respectively; or
- "LC" to identify a tier 4 site within 100 feet of a lead component in the distribution system.

FIELD VERIFIED, SITE STATUS, and TRAINING STATUS. Show if the site's home plumbing or service line material has been field verified by a "Y" in the Field Verified column. Sites selected for sampling should be indicated by entering an "S" in the Site Status column. Optional sites are identified by an "O." To be a selected site, there must be an agreement with the site building owner to sample himself or to have the site sampled by the system. All homeowners who will sample at the selected sites must receive training in sampling procedures. Indicate which homeowners have received training by a "Y" in the Training Status column.

The following specific instructions are for the table in Part V of this form.

ID NUMBER. Use a two-digit number as an identification number.

LOCATION. The street address should be given as the site location.

TARGET DATES. List target sampling dates for the two required sampling rounds to demonstrate how sampling will evaluate seasonal water quality differences.

From: Mark Nicklas <mnicklas@murexproperties.com>
Date: Friday, April 3, 2026 at 2:27 PM
To: Grayson St. John <grayson@wti.services>, Gregor St. John <gregor@wti.services>
Cc: Eric Zimmerman <ezimmerman@murexproperties.com>
Subject: FW: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Megan from the DEP called me today and we spoke for about 30 mins about the inspection and her findings. She said the inspection went well and that WTI was doing a nice job overseeing the Water Plant. The inspection is not a pass or fail, yet a set of observations.

She will be sending out the full inspection to all next week, but gave me some good updates beforehand.

Logging Information

- We need to continue and stay updated on all logging information (see below)

Maintenance

- Need to seal and paint the Clearwell

Mark Nicklas

General Manager

Bonita Terra

25581 Trost Blvd.

Bonita Springs, FL 34135

(239) 992-3030 x 150

mnicklas@murexproperties.com

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From: Eric Zimmerman <ezimmerman@murexproperties.com>

Sent: Wednesday, April 1, 2026 4:14 PM

To: Mark Nicklas <mnicklas@murexproperties.com>

Subject: FW: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

How's WTI doing at responding to these other deficiencies on the list below? Can you get an update from them?

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Date: Thursday, March 19, 2026 at 4:57 PM

To: Grayson St. John <monitoring@wti.services>, Mark Nicklas <mnicklas@murexproperties.com>, Eric Zimmerman <ezimmerman@murexproperties.com>, Licenses <licenses@murexproperties.com>, Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Thank you for sending that in Grayson. Below is a list of the deficiencies found on site. This is not a final list, as my consultants could find more deficiencies when reviewing my report. Feel free to send corrections in as they are completed. I have 2 weeks to send the report to my consultant for review. Any corrections will be included on the report within that 2-ish week timeframe.

- Lead and Copper sampling plan is not up to date for operator information. I've attached a new template to this email.
- DBP sampling plan is not up to date with new quarterly sampling timeframe. Template is attached to this email.
- Grayson, please send in the updated Certificate of Delivery for the DBP MCL violation showing the public notice was hand or mail delivered to residents.
- Chlorine residuals were over 4.0 mg/L for the point of entry and two remote sample locations. Please have photos sent of the residual once it is within 0.6 mg/L – 4.0 mg/L range.
- Please send the invoice for the new chlorine meter that was purchased.
- Facility will need to conduct a Capacity Analysis Report (CAR) because MOR's document an exceedance of 75% of the design capacity for several months. The rule for the CAR is 62-555.348 F.A.C. Florida Rural Water Association (FRWA) may be able to help out with this one.
- There was no generator logbook documenting maintenance / when it is being exercised.
- Leak at high service pump 1.
- No cross-connection control plan on site. Rule: 62-555.360(2) F.A.C.
- Clearwell has cracks and is leaking.

Let me know if you have any questions. Thank you,



Megan Torres

Florida Department of Environmental
Protection

South District Potable Water Compliance
Environmental Specialist III

Megan.Torres@FloridaDEP.gov

Office: 239-344-5670

From: Grayson St. John <monitoring@wti.services>

Sent: Thursday, March 19, 2026 11:38 AM

To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: Re: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Hello,

Attached is the map of the water system for Citrus Park PWS#5360048

-Grayson

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Sent: Thursday, March 12, 2026 3:05:32 PM

To: Grayson St. John <monitoring@wti.services>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Good afternoon,

Below is a list of documentation I will be looking for during my inspection of Citrus Park (Bonita Terra) PWS 5360048. Please feel free to send any paperwork such as sampling plans before the inspection.

- O&M Logbook
- O&M Manual
- MORs
- Treatment process performance records if using any of the following treatments: RO, Nanofiltration, Ion exchange, filtration, coagulation/flocculation, and softening.
- Tank cleaning reports. Aerators are to be flushed and cleaned annually and finished water storage tanks are inspected and cleaned every 5 years by a licensed engineer.
- Isolation Valve Exercising records/plan
- Flushing Program/Records
- Primary (annual) and secondary (daily) chlorine meter calibration records along with the secondary standards, chlorine packets, and the actual meter.
- Emergency Response plan
- Cross Connection Control plan
- Lead and Copper sampling plan
- Bacteriological sampling plan
- Disinfection By-Product plan
- Auxiliary Power Maintenance (records showing it is being exercised)
- Flow meter calibration records (once every 5 years)

I look forward to meeting with you all. Thank you,



Megan Torres

Florida Department of Environmental
Protection

South District Potable Water Compliance

Environmental Specialist III

Megan.Torres@FloridaDEP.gov

Office: 239-344-5670

From: Grayson St. John <monitoring@wti.services>
Sent: Thursday, March 5, 2026 3:47 PM
To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>
Cc: Gregor St. John <gregor@wti.services>
Subject: Re: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Megan,

I would like to confirm March 19th @ 10AM for the Citrus Park PWS inspection.

-Grayson

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>
Sent: Thursday, February 26, 2026 9:08 AM
To: Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>
Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>
Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Good morning Mark,

If we could, I'd like to begin the inspection at 10 am. I would like to point out the CAO Letter sent on February 2, 2026, indicates the MCL was exceeded for DBPs during the last sampling event in September. The facility will need to sample quarterly until there are 4 consecutive quarters below the MCL. A public notice must be posted within 30 days of receiving the letter, which is March 4, 2026.

Thank you,



Megan Torres

Florida Department of Environmental
Protection
South District Potable Water Compliance
Environmental Specialist III
Megan.Torres@FloridaDEP.gov
Office: 239-344-5670

From: Mark Nicklas <mnicklas@murexproperties.com>
Sent: Wednesday, February 25, 2026 5:35 PM
To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>
Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>
Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Dear Ms. Torres

Yes, the date of Thursday, March 19 will work. Do you have a time that you would like to get started for the inspection?

Mark Nicklas

General Manager

Bonita Terra

25581 Trost Blvd.

Bonita Springs, FL 34135

(239) 992-3030 x 150

mnicklas@murexproperties.com

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From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Sent: Monday, February 23, 2026 3:12 PM

To: Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>; Mark Nicklas <mnicklas@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>

Subject: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Some people who received this message don't often get email from megan.torres@floridadep.gov. [Learn why this is important](#)

Good afternoon,

I am contacting you to notify that **Citrus Park RV Resort (Bonita Terra) PWS 5360048** is due to undergo a **Sanitary Survey** this year. The department will review the facility to ensure that it remains in compliance with the expectations put forth by regulatory codes. In adherence to these codes, the following plant features will be inspected: the water source, facilities, equipment, operation, maintenance, and monitoring compliance.

I have provided a date below during which I would be available to conduct this survey. Please let me know if this date works for you, or provide alternative dates as needed:

? **Thursday March 19, 2026**

If there are any questions regarding this process, please feel free to reach out and I will assist in any way possible. I look forward to hearing back soon.

Thank you for your time and attention.



Megan Torres

Florida Department of Environmental
Protection

South District Potable Water Compliance

Environmental Specialist III

Megan.Torres@FloridaDEP.gov

Office: 239-344-5670

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Date: Monday, April 6, 2026 at 9:30 AM

To: Grayson St. John <monitoring@wti.services>, Mark Nicklas <mnicklas@murexproperties.com>, Eric Zimmerman <ezimmerman@murexproperties.com>, Licenses <licenses@murexproperties.com>, Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Good morning Grayson,

Thank you for sending in corrections. The sanitary survey was approved by my assistant director to go out on Friday, so the report will not reflect the corrections you sent today. I have entered them in the system as corrected though.

Best,



Megan Torres

Florida Department of Environmental
Protection

South District Potable Water Compliance
Environmental Specialist III

Megan.Torres@FloridaDEP.gov

Office: 239-344-5670

From: Grayson St. John <monitoring@wti.services>

Sent: Monday, April 6, 2026 6:05 AM

To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Megan,

I have attached the updated DBP sampling plan, updated lead and copper sampling plan, updated COD for recent DBP MCL violation, and documentation of generator exercising being recorded in the logbook.

Thank you,
-Grayson

From: Grayson St. John <monitoring@wti.services>

Sent: Thursday, March 26, 2026 10:36 AM

To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: Re: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Megan,

Attached are photos of the chlorine residual at the POE and 2nd St restroom, Friday March 20th.

-Grayson

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Sent: Thursday, March 19, 2026 4:57 PM

To: Grayson St. John <monitoring@wti.services>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Thank you for sending that in Grayson. Below is a list of the deficiencies found on site. This is not a final list, as my consultants could find more deficiencies when reviewing my report. Feel free to send corrections in as they are completed. I have 2 weeks to send the report to my consultant for review. Any corrections will be included on the report within that 2-ish week timeframe.

- Lead and Copper sampling plan is not up to date for operator information. I've attached a new template to this email.
- DBP sampling plan is not up to date with new quarterly sampling timeframe. Template is attached to this email.
- Grayson, please send in the updated Certificate of Delivery for the DBP MCL violation showing the public notice was hand or mail delivered to residents.
- Chlorine residuals were over 4.0 mg/L for the point of entry and two remote sample locations. Please have photos sent of the residual once it is within 0.6 mg/L – 4.0 mg/L range.
- Please send the invoice for the new chlorine meter that was purchased.
- Facility will need to conduct a Capacity Analysis Report (CAR) because MOR's document an exceedance of 75% of the design capacity for several months. The rule for the CAR is 62-555.348 F.A.C. Florida Rural Water Association (FRWA) may be able to help out with this one.
- There was no generator logbook documenting maintenance / when it is being exercised.
- Leak at high service pump 1.
- No cross-connection control plan on site. Rule: 62-555.360(2) F.A.C.
- Clearwell has cracks and is leaking.

Let me know if you have any questions. Thank you,



Megan Torres

Florida Department of Environmental
Protection
South District Potable Water Compliance
Environmental Specialist III
Megan.Torres@FloridaDEP.gov
Office: 239-344-5670

From: Grayson St. John <monitoring@wti.services>
Sent: Thursday, March 19, 2026 11:38 AM
To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>
Cc: Gregor St. John <gregor@wti.services>
Subject: Re: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Hello,

Attached is the map of the water system for Citrus Park PWS#5360048

-Grayson

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>
Sent: Thursday, March 12, 2026 3:05:32 PM
To: Grayson St. John <monitoring@wti.services>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>
Cc: Gregor St. John <gregor@wti.services>
Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Good afternoon,

Below is a list of documentation I will be looking for during my inspection of Citrus Park (Bonita Terra) PWS 5360048. Please feel free to send any paperwork such as sampling plans before the inspection.

- O&M Logbook
- O&M Manual
- MORs
- Treatment process performance records if using any of the following treatments: RO, Nanofiltration, Ion exchange, filtration, coagulation/flocculation, and softening.
- Tank cleaning reports. Aerators are to be flushed and cleaned annually and finished water storage tanks are inspected and cleaned every 5 years by a licensed engineer.
- Isolation Valve Exercising records/plan
- Flushing Program/Records
- Primary (annual) and secondary (daily) chlorine meter calibration records along with the secondary standards, chlorine packets, and the actual meter.
- Emergency Response plan

- Cross Connection Control plan
- Lead and Copper sampling plan
- Bacteriological sampling plan
- Disinfection By-Product plan
- Auxiliary Power Maintenance (records showing it is being exercised)
- Flow meter calibration records (once every 5 years)

I look forward to meeting with you all. Thank you,



Megan Torres

Florida Department of Environmental Protection
 South District Potable Water Compliance
 Environmental Specialist III
Megan.Torres@FloridaDEP.gov
 Office: 239-344-5670

From: Grayson St. John <monitoring@wti.services>
Sent: Thursday, March 5, 2026 3:47 PM
To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>
Cc: Gregor St. John <gregor@wti.services>
Subject: Re: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Megan,

I would like to confirm March 19th @ 10AM for the Citrus Park PWS inspection.

-Grayson

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>
Sent: Thursday, February 26, 2026 9:08 AM
To: Mark Nicklas <mnicklas@murexproperties.com>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>
Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>
Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Good morning Mark,

If we could, I'd like to begin the inspection at 10 am. I would like to point out the CAO Letter sent on February 2, 2026, indicates the MCL was exceeded for DBPs during the last sampling event in September. The facility will need

to sample quarterly until there are 4 consecutive quarters below the MCL. A public notice must be posted within 30 days of receiving the letter, which is March 4, 2026.

Thank you,



Megan Torres

Florida Department of Environmental
Protection
South District Potable Water Compliance
Environmental Specialist III
Megan.Torres@FloridaDEP.gov
Office: 239-344-5670

From: Mark Nicklas <mnicklas@murexproperties.com>

Sent: Wednesday, February 25, 2026 5:35 PM

To: Torres, Megan <Megan.Torres@FloridaDEP.gov>; Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>

Subject: RE: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Dear Ms. Torres

Yes, the date of Thursday, March 19 will work. Do you have a time that you would like to get started for the inspection?

Mark Nicklas

General Manager

Bonita Terra

25581 Trost Blvd.

Bonita Springs, FL 34135

(239) 992-3030 x 150

mnicklas@murexproperties.com

This e-mail and any attachments may contain confidential information of Bonita Terra / Murex Properties. Any disclosure, copying, distribution or use of this e-mail and any attachments is prohibited. If you have received this e-mail in error, please notify Bonita Terra / Murex Properties immediately by returning it to the sender and delete all copies from your system. Thank you for your cooperation.

From: Torres, Megan <Megan.Torres@FloridaDEP.gov>

Sent: Monday, February 23, 2026 3:12 PM

To: Eric Zimmerman <ezimmerman@murexproperties.com>; Licenses <licenses@murexproperties.com>; Erica Krieger <ekrieger@murexproperties.com>; Mark Nicklas <mnicklas@murexproperties.com>

Cc: Gregor St. John <gregor@wti.services>; Grayson St. John <monitoring@wti.services>

Subject: Schedule Citrus Park RV Resort (Bonita Terra) Sanitary Survey PW Inspection

Some people who received this message don't often get email from megan.torres@floridadep.gov. [Learn why this is important](#)

Good afternoon,

I am contacting you to notify that **Citrus Park RV Resort (Bonita Terra) PWS 5360048** is due to undergo a **Sanitary Survey** this year. The department will review the facility to ensure that it remains in compliance with the expectations put forth by regulatory codes. In adherence to these codes, the following plant features will be inspected: the water source, facilities, equipment, operation, maintenance, and monitoring compliance.

I have provided a date below during which I would be available to conduct this survey. Please let me know if this date works for you, or provide alternative dates as needed:

? **Thursday March 19, 2026**

If there are any questions regarding this process, please feel free to reach out and I will assist in any way possible. I look forward to hearing back soon.

Thank you for your time and attention.



Megan Torres

Florida Department of Environmental Protection

South District Potable Water Compliance

Environmental Specialist III

Megan.Torres@FloridaDEP.gov

Office: 239-344-5670

From: South District <SouthDistrict@dep.state.fl.us>
Date: Wednesday, April 8, 2026 at 1:56 PM
To: Torres, Megan <Megan.Torres@FloridaDEP.gov>
Cc: Mark Nicklas <mnicklas@murexproperties.com>, avolkman@murezproperties.com <avolkman@murezproperties.com>, Eric Zimmerman <ezimmerman@murexproperties.com>, grayson@wti.services <grayson@wti.services>, monitoring@wti.services <monitoring@wti.services>, gregor@wti.services <gregor@wti.services>, Dague, Megan <Megan.Dague@Floridadep.gov>, Pereira, Steven <Steven.Pereira@FloridaDEP.gov>, Rivera, Paola <Paola.Rivera@FloridaDEP.gov>
Subject: DEP MAIL / Citrus Park RV Resort (Bonita Terra) PWS 5360048 Compliance Assistance Offer & Sanitary Survey

Some people who received this message don't often get email from southdistrict@dep.state.fl.us. [Learn why this is important](#)

Please find attached the Department's correspondence regarding the above subject.

In the future, you may access the file in our oculus database if you follow the directions below:

1. Click on the hyperlink:
[https://dpedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=32.1868636.1\]&\[profile=Discovery_Compliance](https://dpedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=32.1868636.1]&[profile=Discovery_Compliance)
2. Click the button labeled **PUBLIC OCULUS LOGIN**
3. Click the rectangular button labeled **SELECT** (to the right of **VIEW**)
4. At the prompt, click either **Open** or **Save**

Thank you for your attention to this matter, if you have any problems with Oculus or opening the link, you may contact the DEP.

smp



FL. Department of Environmental
Protection
South District Office
SouthDistrict@dep.state.fl.us
Office: (239) 344-5600
Fax (850) 412-0590



Drinking Water Annual Fee Account Statement

<https://floridadep.gov>



Statement of Account as of 8/22/2023
Receipt/Statement

Subject: 2023-2024 Receipt/Statement

LICENSES LICENSES@MUREXPROPERTIES.COM
MUREX PROPERTIES, LLC
12629 NEW BRITTANY BLVD.
BLDG. #16
FORT MYERS, FL 33907

Thank you for your payment of the 2023-2024 Drinking Water Annual Fee.

This is a current statement of your Drinking Water Annual Fee account. All fees on this statement were assessed pursuant to Rule 62-4.053, Florida Administrative Code. A copy of the rule may be found at <https://www.flrules.org/gateway/ChapterHome.asp?Chapter=62-4>.

<u>PWS Number</u>	<u>System Name</u>	
5360048	CITRUS PARK RV RESORT	
07/11/2023	Previous balance	\$0.00
07/12/2023	2024 INVOICE 75715	\$1,000.00
7/31/2023	PAYMENT 2017013	\$1,000.00
08/22/2022	Balance	\$0.00

Florida Department of Environmental Protection
Bureau of Finance & Accounting
P.O. Box 3070
Tallahassee, FL 32315-3070

Accounting Information

Object Code: 002216
Org code: 37 35 40 60 000
Expansion Option: M7
FLAIR Code: 37202526001373502000000020000

PWS Number: 5360048
Balance: \$0.00



FLORIDA DEPARTMENT OF Environmental Protection

Ron DeSantis
Governor

Jay Collins
Lt. Governor

Alexis A. Lambert
Secretary

South District
2295 Victoria Ave #364
Fort Myers FL 33901-2549
SouthDistrict@DEP.State.FL.us

February 2, 2026

James Williams
Carlyle Property Investors (Master REIT), L.L.C.
10100 Santa Monica Blvd Suite 600
San Francisco, CA 90067

Re: Compliance Assistance Offer
Citrus Park RV Resort (Bonita Terra)
Facility ID: 5360048
Lee County-PW

Dear James Williams:

A File Review was conducted for your facility on **January 28, 2026**. During this File Review, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

A review of the drinking water samples collected in September 2025 indicates the Maximum Contaminant Level (MCL) for Disinfection By-products *Total Trihalomethanes (TTHMs)* and *Total Haloacetic Acids (HAA5s)* has been exceeded. At location 1, the lab reported a result of 178.95 µg/L for TTHMs and 60.90 µg/L for HAA5s. At location 2, the lab reported a result of 253.95 µg/L for TTHMs and 161.77 µg/L for HAA5s. The MCL is 80 µg/L for TTHMs and 60 µg/L for HAA5s. This is a violation of rule 62-550.514, Florida Administrative Code (F.A.C).

Additionally, department records indicate your facility did not perform required testing for Primary Inorganic Contaminants of *Nitrate and Nitrite* during the 2025 calendar year, which were required to be performed annually per rule 62-550.512 F.A.C.

Therefore, you must:

1. Notify the public of the MCL violation and monitoring violations by mail or hand delivery of the public notice **and** posting of the notice in several conspicuous locations in the service area **within 30 days**. The notice must remain posted minimum for **7 consecutive days**.

James Williams
Compliance Assistance Offer Letter
Citrus Park RV Resort (Bonita Terra)
Facility ID: 5360048
Lee County-PW
Page 2 of 3

2. Complete and submit the Certificate of Delivery of Public Notice **within 10 days** of the notice being distributed along with a copy of the actual notice that was distributed.
3. Begin quarterly monitoring in accordance with the monitoring schedule outlined in this letter. The facility is expected to continue sampling until four consecutive quarters demonstrate that the locational running average results are below 50% of the Maximum Contaminant Levels (MCL) for both Total Trihalomethanes and Total Haloacetic Acids.

Please note, that due to the missed monitoring during 2025, the above-referenced water system will be required to collect two sets of samples for *Nitrate and Nitrite* during the 2026 calendar year. The first set of samples shall be collected as soon as possible, but no later than 15 days after receipt of this letter. Please ensure to collect the annual nitrate/nitrite samples at least 90 days after the collection of the first set of nitrate/nitrite samples.

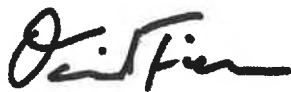
We request you review the item(s) of concern noted and respond within **30 days** of receipt of this Compliance Assistance Offer. Your response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed.
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the item(s) of concern.

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

Please address your response and any questions to **Megan Torres** of the South District Office at **239-344-5670** or via e-mail at Megan.Torres@FloridaDEP.gov. We look forward to your cooperation with this matter.

Sincerely,



David Fiess, MPA
Assistant Director of District Management

Enclosures: Tier 2 Public Notice Template
Certification of Delivery of Public Notice
2026 Updated Monitoring Schedule

James Williams
Compliance Assistance Offer Letter
Citrus Park RV Resort (Bonita Terra)
Facility ID: 5360048
Lee County-PW
Page 3 of 3

cc: Eric Zimmerman, ezimmerman@murexproperties.com
Mark Nicklas, mnicklas@murexproperties.com
Erica A. Krieger, ekrieger@murexproperties.com
Grayson St. John, grayson@wti.services
Gregor St. John, gregor@wti.services
Stan Epperly, stan.epperly@frwa.net

**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**
In Compliance with 62-620.410

Lee County

Facility identification # FLA014477

Prepared on Behalf of
CITRUS PARK NORTH

December 2025

Prepared by:

DRMP, INC
1715 Monroe Street, Suite 500
Fort Myers, FL 33901
(239) 206-5093

**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**

Table of Contents

Section	Title
1	Form 1
2	Form 2A
3	Reports
	Operation and Maintenance Performance Report
	Updated Capacity Analysis
4	Exhibits
	Location Map
	Site Plan
	Process Flow Diagram
	Collection System Map
5	Collection System Action Plan
6	Power Outage Contingency Plan
7	Engineering Data

**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**

SECTION 1

FORM 1



WASTEWATER FACILITY OR ACTIVITY PERMIT APPLICATION FORM 1 GENERAL INFORMATION

I IDENTIFICATION NUMBER:

Facility ID FLA014477

II CHARACTERISTICS:

INSTRUCTIONS: Complete the questions below to determine whether you need to submit any permit application forms to the Department of Environmental Protection. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the blank in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements. See Section B of the instructions. See also, Section C of the instructions for definitions of the terms used here.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a domestic wastewater facility which results in a discharge to surface or ground waters?	X		X
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters?		X	
C. Does or will this facility (other than those describe in A. or B.) discharge process wastewater, or non-process wastewater regulated by effluent guidelines or new source performance standards, to surface waters?		X	
D. Does or will this facility (other than those described in A. or B.) discharge process wastewater to ground waters?		X	
E. Does or will this facility discharge non-process wastewater, not regulated by effluent guidelines or new source performance standards, to surface waters?		X	
F. Does or will this facility discharge non-process wastewater to ground waters?		X	
G. Does or will this facility discharge stormwater associated with industrial activity to surface waters?		X	
H. Is this facility a non-discharging/closed loop recycle system?		X	
I. Is this facility a public water system whose primary purpose is the production of potable water for public consumption and which discharges demineralization concentrate to surface water or groundwater?		X	

III NAME OF FACILITY: (40 characters and spaces)

Citrus Park North WWTP
Facility ID <u>FLA014477</u>

IV FACILITY CONTACT: (A. 30 characters and spaces)

A. Name and Title (Last, first, & title)	B. Phone (area code & no.)
James S. Williams	202-729-5626

V FACILITY MAILING ADDRESS: (A. 30 characters and spaces; B. 25 characters and spaces)

A. Street or P.O. Box: 25501 Trost Boulevard		
B. City or Town: Bonita Springs	State: FL	Zip Code: 34135

VI FACILITY LOCATION: (A. 30 characters and spaces; B. 24 characters and spaces; C. 3 spaces (if known); D. 25 characters and spaces; E. 2 spaces; F. 9 spaces)

A. Street, Route or Other Specific Identifier: 25501 Trost Boulevard		
B. County Name: Lee	C. County Code (if known):	
D. City or Town: Bonita Springs	E. State: FL	F. Zip Code: 34135

VII SIC CODES: (4-digit, in order of priority)

1. Code #: 4952	(Specify) Domes, Sewer	2. Code #:	(Specify)
3. Code #:	(Specify)	4. Code #:	(Specify)

VIII OPERATOR INFORMATION: (A. 40 characters and spaces; B. 1 character; C. 1 character (if other, specify); D. 12 characters; E. 30 characters and spaces; F. 25 characters and spaces; G. 2 characters; H. 9 characters)

A. Name: Gregor St. John		B. Is the name in VIII A. the owner? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C. Status of Operator: F = Federal; S = State; P = Private; O = Other; M = Public (other than F or S)	(code) P	(specify) Private	D. Phone No.: 239 872 4981
E. Street or P. O. Box: 3700 Fort Denaud			
F. City or Town: Labelle		G. State: FL	H. Zip Code: 33935

IX INDIAN LAND: Is the facility located on Indian lands?

Yes

No

Facility ID FLA014477

X EXISTING ENVIRONMENTAL PERMITS:

A. NPDES Permit No.	B. UIC Permit No.	C. Other (specify)	D. Other (specify)
N/A	N/A		

XI MAP: Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII NATURE OF BUSINESS (provide a brief description)

199,000 GPD Wastewater treatment plant that provides service to 3100 citizens. Secondary treated and basic disinfected effluent is discharged to five absorption fields having a capacity of 0.199 MGD TMADF. Biosolids/Residuals are hauled, dewatered and disposed of by Karle Enviro-Organic Recycling at the Lee/Hendry Class I Landfill in Hendry County or the Charlotte County Bio-Recycling Center in Charlotte County, FL.

XIII CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

James Williams

A. Name (type or print)

CPI Citrus Park Owner, LLC

Official Title (type or print)

B. Signature

C. Date Signed

**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**

SECTION 2

FORM 2A



WASTEWATER APPLICATION FORM 2A FOR A DOMESTIC WASTEWATER FACILITY PERMIT

Instructions for selected items are included in the "INSTRUCTIONS FOR FORM 2A". Refer to these instructions before filling out each item.

SECTION 1. APPLICANT AND FACILITY DESCRIPTION

1. Application Type

- New
- Substantial Modification
- Permit Renewal

2. Facility Type

- Wastewater Treatment
- Reuse or Disposal
- Limited Wet Weather Discharge
- Residuals/Septage Management

3. Treatment Facility Information

a. Name Citrus Park North WWTP

b. Facility Identification Number FLA014477

c. Location

Number and Street 25501 Trost Boulevard

City/State/Zip Code Bonita Springs FL 33917

Telephone 239 822 6514

Latitude 26 ° 22 ' 19 "N

Longitude 81 ° 45 ' 16 "W

Dates Coordinates Determined 11/26/2025

Method Used to Obtain Coordinates Google Earth

d. Ownership Type

- Municipal
- County
- State
- Private

e. Contact

Name James S. Williams
 Title Authorized Signatory
 Telephone 202-729-5626

f. Facility Mailing Address

Number and Street 25501 Trost Boulevard
 City/State/Zip Code Bonita Springs, FL 34135

g. Year Facility Began Operation 1985

4. Applicant or Authorized Representative

Legal Name Citrus Park
 Number and Street 25501 Trost Boulevard
 City/State/Zip Code Bonita Springs, FL 34135
 Telephone 202-729-5626
 Contact Person James S. Williams
 Title Authorized Signatory
 Telephone Number _____

Is the applicant the owner or operator (or both) of the facility? Owner Operator

Indicate whether correspondence regarding this facility should be directed to the facility or the applicant.
 Facility Applicant

5. Project Name and Description

Renewal Permit for Citrus Park North WWTP permitted for 199,000 GPD at Three Month Average Daily Flow

6. Municipalities or Areas Served

Name of Municipality or Area	Ownership	Population Served
Citrus Park / Bonita Terra	Private	3100
Total Population Served		3100

7. Reclaimed Water Reuse and Effluent Disposal

Method of Reuse or Disposal	Number of Reuse or Disposal Points	Total Design Capacity (mgd)	Basis of Design Flow
Surface Waters - Excluding Ocean Outfalls and Wetlands (Rule 62-600.510, F.A.C.)			
Ocean Outfalls (Rule 62-600.520, F.A.C.)			
Wetlands (Rule 62-600.620, F.A.C.)			
Reuse of Reclaimed Water and Land Application (Rule 62-600.530, F.A.C.)	1	.199	TMADF
Ground Water Disposal by Underground Injection (Rule 62-600.540, F.A.C.)			
Other (Describe)			
Total	1	.199	TMADF

8. Flows to Another Wastewater Facility

a. Does the facility discharge or transport treated or untreated wastewater to another treatment facility?
 Yes No

b. If yes, describe the mean(s) by which the wastewater from the treatment facility is discharged or transported to the other treatment facility (e.g., collection/transmission system, reclaimed water distribution system)?

If transport is by a party other than the applicant, provide the following:

Transporter name: N/A
Mailing Address: N/A
N/A
Contact person: N/A
Title: N/A
Telephone number: N/A

c. For each treatment facility that receives this discharge, provide the following:

Name: N/A
Mailing Address: N/A
N/A
Contact person: N/A
Title: N/A
Telephone number: N/A

d. Facility Identification Number of Facility Which Receives the Flow

N/A

e. Average Daily Flow Rate to the Receiving Facility

N/A mgd

9. Residuals Use or Disposal

a. Amount of Residuals Generated by the Facility

10.6 dry tons/year

b. Does this facility receive residuals from another facility for further treatment and disposal?

Yes No

c. Method of Residuals Use or Disposal

Method	Number of Sites or Number of Receiving Facilities	Dry Tons Used or Disposed per Year
Land Application (Chapter 62-640, F.A.C.)		
Distribution and Marketing (Chapter 62-640, F.A.C.)		
Landfill Disposal (Chapter 62-701, F.A.C.)		
Incineration (Chapter 62-200 Series, F.A.C.)		
Transport to Another Treatment Facility	1	10.6
Other (Describe)		
Total		10.6

d. If residuals are transported to another facility for landfill disposal, incineration, or treatment, provide the facility name, Facility identification number and address.

Name	Karle Environmental
Facility Identification Number	N/A
Number and Street	2991 South Street
City/State/Zip Code	Fort Myers, FL 33916
County	Lee
Telephone	239 693 6600
Treatment Processes Used by Receiving Facility	Dewatering

10. Permits and Applications

a. Expiration Date of Current NPDES Permit N/A

b. Expiration Date of Current DEP Permit July 13, 2026

c. Permit Number of Any Existing Environmental Permits

NPDES	_____	PSD	_____
UIC	_____	Other	_____
RCRA	_____	Other	_____

d. Orders and Notices

Type or Order or Notice	Issuing Agency	Date of Order or Notice
Notice or Violation		
Consent Order		
Administrative Order		
Other (Describe.)		

SECTION 2. TREATMENT FACILITY DESCRIPTION

1. Flow

a. Design Capacity

Current Design Capacity	.199	mgd
Proposed Incremental Design Capacity	+	0
Proposed Total Design Capacity	=	.199

b. Basis of Design Flow

- Annual Average Daily Flow
- Maximum Monthly Average Daily Flow
- Three-Month Average Daily Flow
- Other. If other, specify.

	Two Years Ago	Last Year	This Year	
c. Annual Average Daily Flow Rate	.078	.077	.093	mgd
d. Maximum Daily Flow Rate	.125	.124	.122	mgd

2. Design Treatment Levels

Parameter	Effluent Concentration	Units	Basis	Percent Removal
pH	6 to 8.5	Standard Units		
CBOD ₅	20	mg/L	TMADF	90-98%
TSS	20	mg/L	Single Grab Sample	90-98%
CHLORINE	.5	mg/L	Minimum	
Nitrate	30	mg/L	Maximum	

3. Disinfection Level Provided

- Low-level
- Basic
- Intermediate
- High-level
- High-level Alternative

If the facility disinfects by chlorination and the discharge is to surface waters, is dechlorination provided?

- Yes No

4. Residuals Treatment

a. Class of Residuals

- Class AA (Rule 62-640.850, F.A.C.)
- Class A (Rule 62-640.600, F.A.C.)
- Class B (Rule 62-640.600, F.A.C.)
- Other

If other, describe

Transferred off site for treatment

b. Describe, on this form or another sheet of paper, any treatment processes used at your facility to reduce pathogens in sewage sludge:

Aerated sludge holding tanks

c. Which vector attraction reduction option is met for the sewage sludge at your facility?

- Option 1 (Minimum 38 percent reduction in volatile solids)
- Option 2 (Anaerobic process, with bench-scale demonstration)
- Option 3 (Aerobic process, with bench-scale demonstration)
- Option 4 (Specific oxygen uptake rate for aerobically digested sludge)
- Option 5 (Aerobic processes plus raised temperature)
- Option 6 (Raise pH to 12 and retain at 11.5)
- Option 7 (75 percent solids with no unstabilized solids)
- Option 8 (90 percent solids with unstabilized solids)
- Option 9 (Injection below land surface)
- Option 10 (Incorporation into soil within 6 hours)
- Option 11 (Covering active sewage sludge unit daily)
- None or unknown

d. Describe, on this form or another sheet of paper, any treatment processes used at your facility to reduce vector attraction properties of sewage sludge:

e. Parameter Concentrations

POLLUTANT	CONC.	UNITS
Total Nitrogen		% dry weight
Total Phosphorus		% dry weight
Total Potassium		% dry weight
Arsenic		mg/kg dry weight
Cadmium		mg/kg dry weight
Chromium		mg/kg dry weight
Copper		mg/kg dry weight
Lead		mg/kg dry weight
Mercury		mg/kg dry weight
Molybdenum		mg/kg dry weight
Nickel		mg/kg dry weight
Selenium		mg/kg dry weight
Zinc		mg/kg dry weight
pH		standard units
Total Solids		%
Other Parameters		

Date of Sample _____

5. Reliability Class

- Class I
- Class II
- Class III
- Other Equivalent Reliability

SECTION 3. B. REUSE AND LAND APPLICATION SYSTEMS

1. Reuse or Land Application System Serial Number and Name

Reuse or Land Application System Serial Number R001

2. Reuse or Land Application System Location

County Lee
 City or Town (if applicable) Bonita Springs
 Street or Description 25501 Trost Boulevard

Latitude 26 ° 22 ' 21 "N
 Longitude 81 ° 45 ' 17 "W
 Dates Coordinates Determined 11/26/2025
 Method Used to Obtain Coordinates Google Earth

3. Design Capacity of the Reuse or Land Application System

Current Design Capacity .199 mgd
 Proposed Incremental Design Capacity + 0 mgd
 Proposed Total Design Capacity = .199 mgd

4. Basis of Design Flow

- Annual Average Daily Flow
- Maximum Monthly Average Daily Flow
- Three-Month Average Daily Flow
- Other

If other, specify

5. Is land application continuous or intermittent?

Continuous Intermittent

6. Underdrains and Perimeter Ditches

a. Is the reuse or land application system underdrained?

Yes No

b. Are perimeter ditches used?

Yes No

If yes, will they be excavated to a depth which will intersect the seasonal high ground water table or the ground water mound during any portion of the year?

Yes No

7. Type of Reuse or Land Application System

- Slow-rate land application system/restricted public access (Chapter 62-610, F.A.C., Part II)
- Slow-rate land application system/public access areas, residential irrigation, and edible crop irrigation (Chapter 62-610, F.A.C., Part III)
- Rapid-rate land application system (Chapter 62-610, F.A.C., Part IV)
- Absorption field system (Chapter 62-610, F.A.C., Part V)
- Overland flow system (Chapter 62-610, F.A.C., Part VI)
- Other land application system with additional levels of preapplication treatment (Rule 62-610.660, F.A.C.)
- Other land application system with lower levels of preapplication treatment (Rule 62-610.670, F.A.C.)

8. Application Areas and Rates

Site/Use Type/Major User	Area (acres)	Rate (inches/week)	Capacity (mgd)
Citrus Park North Percolation Ponds	2.29	22.4	.199
Total	2.29	22.4	.199

9. Additional Information Required for Reuse Systems Permitted Under Part III of Chapter 62-610, F.A.C.

- a. Areas Irrigated
- Residential lawns
 - Golf courses
 - Cemeteries
 - Parks, playgrounds
 - Landscape areas
 - Highway medians, rights-of-way
 - Edible crops
 - Others

If other, specify _____

- b. Other Uses of Reclaimed Water
- Toilet flushing
 - Fire protection
 - Construction dust control
 - Aesthetic purposes (decorative ponds, fountains, etc.)
 - Others

If other, specify. _____

- c. How many hours per day, seven days per week, is or will an operator be on-site at the wastewater treatment facility?

.5 hour/6 days hours per day

If the treatment facility is or will be staffed by an operator less than 24 hrs/day, describe the additional levels of reliability included within the treatment or reuse systems (See Rule 62-610.462, F.A.C.)

- d. For permit renewals, list the dates on which the operating protocols (as described in Rule 62-610.463, F.A.C.) were submitted to the Department and the date of the Department's approvals during the last five years.

Date Submitted	Date Approved

- e. For each site where edible crops are or will be irrigated with reclaimed water, describe the crops grown; the type of application system used; provisions for crop washing and for processing, if any; and provisions for control of public access, if any. (See Rule 62-610.475, F.A.C.)

8. For permit renewals involving a limited wet weather discharge permitted under Rule 62-610.860, F.A.C., provide the number of days during each of the last five years that the actual dilution ratio, as defined in Rule 62-610.860, F.A.C., was less than the minimum SDF and the number of months in which the monthly average CBOD₅ or TKN in the limited wet weather discharge exceeded the permit limitations.

Year	Number of Days the Dilution Ratio Was Less Than SDF	Number of Months the Limits Were Exceeded	
		CBOD ₅	TKN
1.			
2.			
3.			
4.			
5.			

SECTION 8. DOCUMENTATION SUBMITTED

1. General Application Requirements	Attached	
	Yes	No
a. Process Flow Diagram	X	
b. Site Plan	X	
c. Location Map	X	
d. Agricultural Use Plan or Dedicated Site Plan		X
e. Capacity Analysis Report	X	
f. Results of Whole Effluent Biological Toxicity Testing		X
g. Reuse Feasibility Study		X
h. Binding Agreements and Documentation of Controls on Individual Users of Reclaimed Water		X

2. Additional Application Requirements for New Facilities and Modifications to Existing Facilities	Yes	No
	a. Preliminary Design Report	
b. Documentation of Compliance with Antidegradation Requirements		X
c. Public Service Commission Certification Number and Copy of Certificate or Order Number and Copy of Order		X
d. Letter from the Management and Storage of Surface Waters Permitting Agency		X
e. Request for Approval of Monitoring Plans for Discharge of Domestic Wastewater to Wetlands		X
f. Concurrent Application for Ground Water Disposal by Underground Injection		X
g. Application for Monitoring Plan Approval		X

3. Additional Application Requirements for Permit Renewals	Yes	No
	a. Operation and Maintenance Performance Report	X
b. Reclaimed Water or Effluent Analysis Report		X
c. Technical Evaluation of Need to Revise Local Pretreatment Limits		X
d. Results of Mechanical Integrity Testing		X

SECTION 9. CERTIFICATIONS

1. Certifications for Construction of New Facilities or Modifications to Existing Facilities

a. Applicant or Authorized Representative

I certify that the statements made in this application for a permit and all attachments are true, correct, and complete to the best of my knowledge and belief. I agree to retain the design engineer, or another professional engineer registered in Florida, to conduct on-site observation of construction, to prepare a notification of completion of construction, and to review record drawings for adequacy as referenced in Rule 62-620.630, F.A.C. Further, I agree to provide an appropriate operation and maintenance manual for the facilities pursuant to Rule 62-620.630, F.A.C., and to retain a professional engineer registered in Florida to examine (or to prepare or revise, if necessary) the manual. For projects regulated by Chapter 62-610, F.A.C., I agree to provide the additional operation requirements of that Chapter.

_____ (Signature of Applicant or Authorized Representative ¹)	_____ Date
_____ Name (please type):	_____ Company Name:
_____ Florida Registration Number:	_____ Company Street Address or P O Box
_____ Telephone No. (including area code)	_____ City/State/Zip Code:
_____ Email (optional)	

b. Professional Engineer Registered in Florida

I certify that the engineering features of this domestic wastewater project have been (designed) (examined) by me and found to conform to engineering principles applicable to such projects. In my professional judgment, this facility, when properly constructed, operated, and maintained, will comply with all applicable statutes of the State of Florida and rules of the Department.

_____ Name (please type):	_____ Company Name:
_____ Florida Registration Number:	_____ Company Street Address or P O Box
_____ Telephone No. (including area code)	_____ City/State/Zip Code:
_____ Email (optional)	
_____ (Seal, Signature, Date, Registration No.)	

¹ If signed by the authorized representative, attach a letter of authorization.

c. Professional Engineer Registered in Florida

I certify that this firm or individual has been retained by the applicant to prepare a notification of completion of construction, to prepare operation and maintenance manuals, and to review record drawings for adequacy as referenced in Rules 62-620.630, 62-600.717, and 62-600.720, F.A.C.

_____ Name (please type):	_____ Company Name:
_____ Florida Registration Number:	_____ Company Street Address or P O Box
_____ Telephone No. (including area code)	_____ City/State/Zip Code:
_____ Email (optional)	
_____ (Seal, Signature, Date, Registration No.)	

2. Certifications for Permit Renewals

a. Applicant or Authorized Representative

I certify that the statements made in this application for a permit and all attachments are true, correct and complete to the best of my knowledge and belief. I agree to operate and maintain these wastewater facilities in such a manner as to comply with the provisions of Chapter 403, F.S., Chapter 62-600, F.A.C., and all other applicable rules of the Department. Further, an appropriate operation and maintenance manual which has been examined by a professional engineer as certified below is available and located at WWTP and can be submitted upon request as part of the permit procedure. A copy of the record drawings or other plans (as applicable) showing modifications to existing facilities, as referenced in Rule 62-600.717, F.A.C., is available at the same location. I also understand that a permit if granted by the Department, is transferable only upon Department approval in accordance with Rule 62-620.340, F.A.C., and I will notify the Department in accordance with this rule upon sale or legal transfer of the permitted facilities. In the event of abandonment or inactivation of the facilities, I will notify the Department and ensure that public health and safety are protected as required by Rule 62-620.610, F.A.C.

_____ (Signature of Applicant or Authorized Representative ²) James Williams	_____ 3/9/2026 Date
_____ Name (please type) CPI Citrus Park Owner, LLC	_____ Company Name
_____ Title 202-729-5626	_____ Company Street Address or P O Box Bonita Springs, FL 34135
_____ Telephone No. (including area code)	_____ City, State, Zip Code
_____ Email (optional)	

² If signed by the authorized representative, attach a letter of authorization.

b. Professional Engineer

I certify that the engineering features of these domestic wastewater facilities have been examined by me and found to conform to engineering principles applicable to such projects. I certify that the operation and maintenance manual for these wastewater facilities has been prepared or examined by me or by individual(s) under my direct supervision and that there is reasonable assurance, in my professional judgement, that the facilities, when properly operated and maintained in accordance with this manual, will comply with all applicable statutes of the State of Florida and rules of the Department.

Ross Hackethal
Name (please type):
93615
Florida Registration Number:
239 206 5095
Telephone No. (including area code)
rhackethal@drmp.com
Email Address (optional)

DRMP, INC
Company Name:
1715 Monroe Street, Suite 500
Company Street Address or P O Box
Fort Myers, FL 33901
City/State/Zip Code:

R. Hackethal #93615 3/12/2026 (Seal, Signature, Date, Registration No.)



**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**

SECTION 3

REPORTS

- Operation and Maintenance Performance Report
- Updated Capacity Analysis

OPERATION AND MAINTENANCE PERFORMANCE REPORT

In Compliance with 62-600.735

Citrus Park North WWTP

in Lee County

Facility identification # FLA014477

Expiration date: July 13, 2026

Inspection date: November 18, 2025

December 2025

Prepared by:

DRMP, Inc.

1715 Monroe Street, Suite 500

Fort Myers, FL 33901

(239) 206-5093

CERTIFICATIONS

PERMITEE:

I have reviewed and am fully aware of the recommendations and schedules in this report.



Owner's Representative Signature

3/9/2026

Date

James Williams
CPI Citrus Park Owner, LLC
25501 Trost Boulevard
Bonita Springs, FL 34135

ENGINEER:

The information contained in this report is true and correct to the best of my knowledge. The report was prepared in accordance with sound engineering principles, and I have discussed the recommendations and schedules with the permittee, and the lead operator. If the recommended schedules for corrective action are met, the facilities, when properly operated and maintained, will comply with all applicable statutes of the State of Florida and rules of the Department.



Ross Hackethal, PE #93615

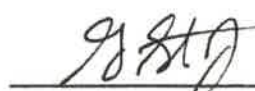
3/12/2026

Date

DRMP, Inc.
1715 Monroe Street, Suite 500
Fort Myers, Florida 33901

OPERATOR:

I have reviewed and am fully aware of the recommendations and schedules included in this report.



Operator's Signature

3/12/26

Date

Grayson St. John

Name (Printed or Typed)

C 30055

State License #

TABLE OF CONTENTS

1. Introduction
2. Physical Conditions
3. Treatment and Efficiency Evaluation
4. Performance Trends
5. Operation and Maintenance Program
6. Collection System Evaluation
7. Problems, Deficiencies, and Corrective Actions

INTRODUCTION

Permitted Capacity

The Citrus Park North Wastewater Treatment Plant has a permitted capacity of 199,000 GPD (three month average daily flow / TMADF) using an Extended Aeration Process and includes flow equalization, aeration / re-aeration, final settling, sludge digestion, and chlorine contact.

Effluent Limitations

Chlorine:	0.5 mg/l after 15 minutes at peak hourly flow
BOD ₅ :	20 mg/l annual average 30 mg/l monthly average 45 mg/l weekly average 60 mg/l single grab sample
TSS:	20-mg/l annual grab sample 30 mg/l monthly average 45 mg/l weekly average 60 mg/l single grab sample
Fecal Coliform:	200/100 ml for geometric mean of ten samples in a 30-day consecutive day period 200/100 ml for annual period (arithmetic mean of monthly values) 400/100 ml for no more than ten percent of samples in a 30-day period 800/100 ml maximum for any one sample
Nitrogen:	30-mg/l single grab sample

Facility Description

The wastewater facility at Citrus Park North is a modular concrete tank plant. The plant consists of the following components:

- One bar screen,
- One 88,000-gallon surge tank,
- One Splitter box,
- Three aeration tanks totaling 196,000 gallons,
- Two digester tanks totaling 67,000 gallons,
- Two 2,600-gallon chlorine contact tanks,
- Five percolation ponds with a total area of 997,752 square feet.

Date Facility Placed in Service:

1985

Dates of Modification:

Minor Revision: Raise the allowed nitrogen limit to 30-mg/l single sample, bi-weekly at monitoring site EFA-01.

Department Recommended Corrective Actions of Past 5 Years:

All of the following items have been resolved with the FDEP. These items were followed up in our inspection to confirm their status

Deficiency: At the time of inspection, plant headworks (bar screen and surge tanks) were offline, and wastewater had been diverted to the splitter box.

Corrective Action: Bar screen and surge tanks were online. Citrus Park's wastewater now follows permit approved process flow into plant headworks.

Deficiency: At the time of inspection there was evidence of overflow, including dried toilet paper and detritus around the surge tanks.

Corrective Action: No evidence of recent overflows around surge tanks and surrounding area was adequately clean

Deficiency: At the time of inspection diffusers in the facility surge tanks were severely corroded and inoperable.

Corrective Action: Diffusers were operating as intended.

Deficiency: At the time of inspection, the container for collection screening and grit at the head works was severely corroded and as a result has server hole that would allow leachate to drain to the ground if it were in use.

Corrective Action: A new container has been installed for grit and leachate collection.

Deficiency: At the time of inspection, the clarifier was not achieving proper settling and solids were discharging over the weir.

Corrective Action: Proper settling for the clarifier has been achieved, and no solids were observed traveling over the weir.

Deficiency: At the time of inspection several aeration basin diffusers were inoperable while the remaining diffusers were not providing adequate mixing.

Corrective Action: Diffusers for the aeration basins are operable and free of clogs. Diffusers provide adequate mixing for the aeration basins.

Deficiency: At the time of inspection, the return line and the RAS line were noted to cause excessive splashing

Corrective Action: Return line and RAS line pressures have been reduced to minimize excessive splashing.

Deficiency: At the time of inspection only one blower was operational on the north plant and only two blowers were operational on the south plant.

Corrective Action: All blower motors are present and operational.

Deficiency: At the time of inspection only one digester was operational. The operational digester had a significant hole in the tank wall allowing the contents of the digester and aeration basin to mix.

Corrective Action: Both plant digesters are operational. The hole in the digester tank has been repaired. No observed mixing between the digester tank and aeration basin.

Deficiency: At the time of inspection, the surge tank only had one operation pump

Corrective Action: All surge tanks pumps are operational.

Deficiency: The effluent in the chlorine contact chamber was turbid and brown in color

Corrective Action: Effluent from the chlorine contact chamber is clear and free from scum, debris, and the accumulation of solids.

Deficiency: At the time of inspection, only one chlorine injection point was serving two tanks.

Corrective Action: A new pump was installed and piping supplies chlorine to each tank providing adequate mixing and optimal chlorine supply and contact.

Deficiency: Stilling well contained a think layer of sludge with rags visible on the airline. In addition, there were plants growing in the stilling well.

Corrective Action: Stilling well is free of sludge, debris and vegetation.

Deficiency: Several cracks and leaks noted on the tank walls

Corrective Action: Cracks on tank walls have been repaired. No leaks present.

Deficiency: Lift station #1 only had one operational pump

Corrective Action: All pumps for Lift Station #1 are present and operational.

Deficiency: Stairs at facility are rotted and have broken steps.

Corrective Action: Facility steps have been repaired and are functional.

PHYSICAL CONDITION

Hydraulic Loading

The 199,000 GPD permitted capacity of the Citrus Park North WWTP is based on the three-month average daily flow (TMADF). The TMADF has not exceeded the permitted capacity during the past five years. The following graph depicts the TMADF to the plant for the past five years.

Figure 1
Monthly TMADF

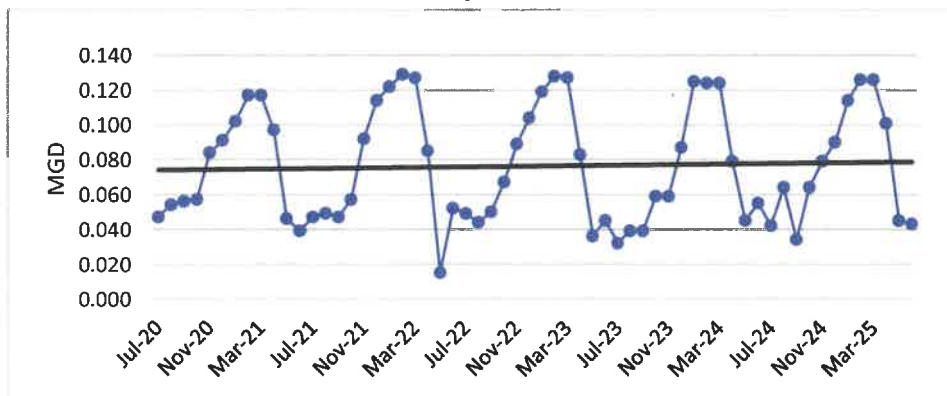


Figure 1 shows that the Monthly TMADF has not exceeded the FDEP permitted flow rate of 0.199 MGD. The trendline above shows that the flow rate to the plant have remained relatively constant over the past five years. The Maximum TMADF for the past five years was 0.126 MGD in March of 2022, which is below the permitted capacity.

Table 1 depicts the Annual Average Daily Flow (AADF), Maximum Monthly Average Daily Flow, and highest Three-Month Average Daily Flow (TMADF). From Table 1, the highest Three-Month Average Daily Flow for the past year is 61% of the permitted flow, while the Annual Average Daily Flow is also 39% of the permitted flow due to the very consistent flows during this period.

Table 1: AADF and Highest TMADF

	AADF (MGD)	MMADF (MGD)	Highest TMADF (MGD)
Past Year	0.077	0.126	0.122
Past 3 Years	0.076	0.129	0.125
Past 5 Years	0.076	0.156	0.126

The following graph depicts each months' average daily flow to the plant for the past five (5) years:

Figure 2
Five Year Monthly Average Daily Flow

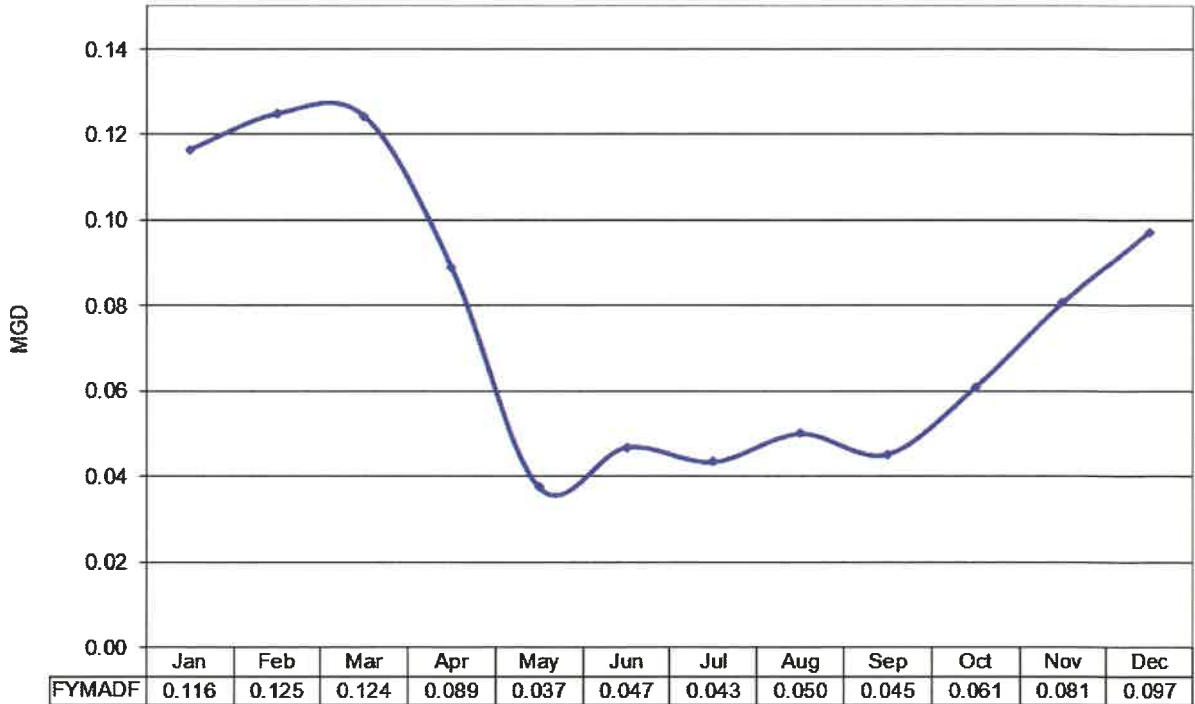


Figure 2 shows that the flow rate to the plant is well below the FDEP permitted capacity through the seasonal uptick of homeowners during the months of January, February, and March. The rainy months of July, August, and September are low and resemble a similarity to the drier April, May, and June months. This data shows there is little to no inflow and infiltration occurring in the collection system of the facility.

Organic Loading

The influent BOD₅ and TSS concentrations are average for domestic wastewater treatment plants. The average concentrations for the past five years are shown in Table 2.

Table 2
Influent BOD₅ and TSS Concentrations

	BOD ₅ (mg/l)	TSS (mg/l)
Past Year	269	269
Past 3 Years	254	207
Past 5 Years	213	189

The influent concentrations of BOD₅ for the past five years are typical for a domestic WWTP of this size and have been fairly consistent for the past 5 years. The influent concentrations of TSS also match these same traits.

Requirement Compliance

Rule 62-600.400 (1)(b): Reliability Standards – Plant meets reliability requirements.

Rule 62-600.400 (2)(a): Adverse Effects – Plant meets requirements.

Rule 62-600.400 (4)(a) & (4)(b): Sampling Points and Flow Measurement - Provisions for access points and for flow measuring have been made and are depicted on the flow diagram.

Continuing Operations

The plant is operating properly as is visible in the data provided. We believe that this plant will operate properly for the 5-year renewal period.

Safety Features

WWTP is located within a perimeter fenced area with a locked gate. Audio and visual alarms are installed on the pumping control panels at the WWTP.

TREATMENT AND EFFICIENCY EVALUATION

Efficiency of each process and overall plant efficiency

Component Capacities

The capacities of the components of Granada Lakes WWTP are as follows:

- One bar screen,
- One 88,000-gallon surge tank,
- One Splitter box,
- Three aeration tanks totaling 196,000 gallons,
- Two digester tanks totaling 67,000 gallons,
- Two 2,600-gallon chlorine contact tanks,
- Five percolation ponds with a total area of 997,752 square feet.

Overall Treatment Efficiency

The overall treatment efficiency in removing TSS and BOD has been 97.3% and 93.0% respectively over the past five (5) years. The following table is a summary of the plant operating efficiency over that five-year period:

Table 3
Operating Efficiency over Past Five Years

Item	BOD ₅	TSS
Influent (mg/L)	213	189
Effluent (mg/L)	5.6	13.1
Removal Efficiency (%)	97.3	93.0

Both the average Effluent BOD and TSS were within permitted parameters. The overall treatment efficiency should remain compliant over the next five years.

Pumping Facilities

Raw Wastewater: The development is served by three main lift stations with 8 smaller service stations. The three main lift stations are located at the following locations; The north lift station (4th Street north of Hamlin), central lift station (4th Street south of Hamlin), and the south lift station (Gardenia Drive and Trost Boulevard).

The north lift station was in good condition. All floats were operational and the water level inside the concrete structure was relatively low. Both pumps are functioning. Locks were engaged at the hatch to the lift station and the electric panel. The visual and audio alarm were both functioning.

The central lift station was in great condition. All floats were operational with no signs of I&I within the wetwell. This lift station also is equipped with an odor control unit. The hatch to the lift station uses a camlock. The visual and audio alarm were both functioning. There was a small

leak present at the above ground manifold.

The south lift station was in good condition. All floats and both pumps were operational with no signs of I&I within the wetwell. Locks were engaged at the hatch to the lift station and the electric panel was in good shape. The visual and audio alarm were both functioning. Valve vault was full of water.

Recommendations for Additions and Improvements to Pumping Facilities

1. Central lift station: Seal leaking manifold connection
2. South lift station: fix clogged drain within valve vault piping

Preliminary Treatment

Bar Screen

The bar screen was in good condition.

Flow Equalization Tanks

Wastewater enters the treatment plant and is screened by a large wedge wire “fine” bar screen located at the south side of the plant. The bar screen was in good condition. The area surrounding the bar screen was clear and no debris was found scattered throughout the site. The surge tank system has an automatic overflow.

There are two surge tanks with a volume of 88,000 gallons. All of the concrete structures are in good condition at the time of this inspection. The surge system has a dedicated aeration system with two blowers and three submersible pumps which repump flow into the splitter box.

Splitter Device

The splitter box is located in the middle of the facility. It is in good condition.

Recommendations for Additions and Improvements to Preliminary Treatment

None

Biological Treatment

Contact Tanks, Reaeration System, and Equipment:

The wastewater treatment plant operates via two separate trains (North and South) which receive flow equally via the splitter box and a piped manifold. There are four aeration tanks totaling 196,000-gallons.

The north train consists of one large single aeration tank of 96,000 gallons with two air blowers that concentrate air to the north train. The south train has three aeration tanks totaling 100,000 gallons and another three blowers which distribute air.

The aeration blowers are all piped in one collective system in addition to the surge tanks. The three sets of blowers are all covered with roofing structures. There are neither dead spots nor any air leaks at the time of inspection and all blowers are functioning properly. The tanks are in good condition at the time of this investigation. All piping connections were solid. The tank top walkway was replaced within the past year and was in good shape with a railing securely surrounding each tank.

Aeration Hydraulic Design Parameters: (Design Parameter 24 hours)

Value based on the Permitted Capacity

$$199,000 \text{ gallons} \div 199,000 \text{ GPD} \times 24 \text{ hours/day} = 24 \text{ hour detention time}$$

Value based on the Maximum Monthly Average Daily Flow (MMADF)

$$199,000 \text{ gallons} \div 156,000 \text{ GPD} \times 24 \text{ hours/day} = 30.6 \text{ hours, which is within the design parameters}$$

Organic Design Parameters:

The past five years' average BOD influent loading is 213 mg / L. The volume of aeration is 26,201 cubic feet.

Hydraulic Design Parameters: The Ten States Standards permissible loading for influent BOD for the contact stabilization process is 15 lbs BOD/d/1000ft³ of aeration volume.

Actual Value Based on Permitted Capacity:

$$\begin{aligned} &.199 \text{ MGD} \times 213 \text{ mg/L} \times 8.34 \text{ (lb - L / MGD - mg)} = 348.2 \text{ lbs BOD / day,} \\ &348.2 \text{ lbs BOD / day} \times 1000 \text{ ft}^3 / 26,201 \text{ ft}^3 = 13.3 \text{ lbs BOD / day} \end{aligned}$$

Actual Value Based on maximum TMADF:

$$\begin{aligned} &.126 \text{ MGD} \times 213 \text{ mg/L} \times 8.34 \text{ (lb - L / MGD - mg)} = 223.8 \text{ lbs BOD / day,} \\ &223.8 \text{ lbs BOD / day} \times 1000 \text{ ft}^3 / 26,201 \text{ ft}^3 = 8.5 \text{ lbs BOD / day, is within the design parameters} \end{aligned}$$

The 5-year data shows a BOD load rate are well within design parameters.

Recommendations for Additions and Improvements to Aeration System

None

Sedimentation:

Final: Sedimentation is provided by two clarifiers each with a volume of 11,500 gallons and immediately following the flow path from the aeration tanks. The overflow weirs provide clean effluent to the next step in the process, the chlorine contact chambers. Each clarifier has a piped manifold collecting the settled biomass at the bottom of the tank. This manifold has a set of valves which can be open and closed to divert flow via a return activated sludge (RAS) line or a

waste activated sludge (WAS) line. The RAS piped flow helps return microorganisms into the aeration tank to keep a healthy microbiome. The WAS piped flow prevents microorganisms from overpopulating by removing a portion of the biomass entirely from the system via a digester. Both clarifiers are operational, and no leaks were detected around the pipes or fittings. The overflow weirs were also in good shape.

Design Parameters:

Surface Overflow Rate: <1,000 GPD/SF at peak hourly flow. The area of the clarifier is a combined 320 square feet.

Rate Based on Permitted Capacity

$$\text{Surface Overflow Rate: } 199,000 \div 320 \text{ SF} = 622 \text{ GPD/SF}$$

Rate Based on maximum 5 year MMADF

$$\text{Surface Overflow Rate: } 126,000 \div 320 \text{ SF} = 394 \text{ GPD/SF}$$

Weir Loading Rate: < 20,000 GPD/LF at peak hourly flow. There are dual weirs with a combined laying length of 24 linear feet.

Rate Based on Permitted Capacity

$$\text{Weir Loading Rate: } 199,000 \div 24 \text{ LF} = 8,292 \text{ GPD/LF}$$

Rate Based on five year maximum TMADF

$$\text{Surface Overflow Rate: } 126,000 \div 24 \text{ LF} = 5,250 \text{ GPD/LF}$$

The Surface Overflow Rate and the Weir Loading Rate are well within design parameters.

Recommendations for Additions and Improvements to the Final Clarifier

None

Disinfection:

Chlorine Contact Chamber:

The chlorine contact chamber consists of two 2,600 gallon concrete tanks with internal baffles located at each respective train's end. To provide basic level disinfection, liquid sodium hypochlorite is stored in three polyethylene storage tanks located under a covered structure at the north end of the plant. A Stenner pump draws liquid chlorine from the holding tank and injects the chemical into where water first enters each tank. The chlorine contact chamber was in good condition.

Design parameters:

The design parameter is to have a chlorine residual of 0.5 at 15 minutes of contact time at peak hourly flow. Peak hour flow is the actual flow to the plant as controlled by the splitter box which has a design capacity of 199,000 GPD or 138 gpm.

Value Based on Permitted Capacity:

5,200 gallons ÷ 138 GPM = 37.6 minutes, which meets the design standards.

Value Based on 5 year maximum TMADF:

5,200 gallons ÷ 87.5 GPM = 87.5 minutes, which meets the design standards.

Recommendations for Additions and Improvements to the Disinfection System

None

Residuals Treatment/ Handling

Aerobic Sludge Holding Tank: Waste activated sludge is pumped from the final clarifier to four 5,000 gallon capacity aerobic digesters. The tanks are in good condition. No overflows were detected at the digesters during the time of inspection. There were two leaks detected on the piping connections between the tanks which have now been sealed. Thickened sludge is taken off site to a separate facility for dewatering and then transferred to the landfill.

Design Parameters:

3 CF per 100 GPD at TMADF (Ten States Standards).

Actual Values Based on Permitted Capacity:

$199,000 \times 7.48 \times 3 \div 100 = 44,656$ gallons of volume required

Actual Value Based on five year maximum TMADF:

$126,000 \times 7.48 \times 3 \div 100 = 28,274$ gallons required.

Digester volume (67,000 gallons) is sufficient and within the design parameters

Recommendations for Additions and Improvements to the Aerobic Digesters

None.

Reuse System

Rapid Rate Land Application (Percolation Ponds): The final effluent is pumped to five percolation ponds with a total area of 99,752 SF. At the time of this inspection the percolation ponds were well kept and very low of water. The percolation rate has no issue handling the flow seen from the plant.

Design Parameters:

The original design parameter for the percolation ponds was an absorption rate of 1.99 GPD/SF for the permitted capacity of 199,000 GPD.

Actual Values Based on Permitted Capacity:

$199,000 \text{ GPD} \div 99,752 \text{ SF} = 1.99 \text{ GPD/SF}$

Actual Value Based on MMADF per square foot:

$$156,000 \text{ GPD} \div 99,752 \text{ SF} = 1.56 \text{ GPD/SF}$$

Percolation pond is sufficient and within the design parameters

Recommendations for Additions and Improvements to the Reuse System

There is no signage indicating the ponds are wastewater effluent and that there should be no swimming or fishing

Instrumentation & Monitoring Equipment

Flow Monitoring: Flow is measured using an ultrasonic flow meter.

Sampling Collection

Sampling Locations: Influent samples are taken from the influent pipe located at the bar screen. Effluent samples are taken from the effluent pump station wetwell at the overflow pipe from the chlorine contact chamber.

Miscellaneous:

Backflow Prevention Device: A backflow prevention device was installed on the water line to the plant. The BFP will be certified and a copy sent into the Department.

PERFORMANCE TRENDS

Influent

Flows:

The Citrus Park North WWTP serves a total of 3,100 residents. There are no plans to increase the population or expand the service area. The maximum average for any month during the past five year renewal period was 156,000 GPD. The maximum TMADF for the past five years was 126,000 GPD and this should remain the same for the next 5 year permitting period.

BOD₅

The influent BOD₅ concentration has averaged 213.0 mg/L for the past five years with last year being the highest with an average of 269.0 mg/l. The BOD levels are within permitted parameters

TSS

The influent TSS concentration has been 189.0 mg/L for the past five years. Last year the average influent TSS was 269.0 mg/l, which is slightly higher. With these results the TSS levels are fairly consistent and should remain as expected to the five year data.

Effluent

BOD₅

Effluent BOD₅ levels have remained relatively constant over the past five years with an average effluent loading of 5.6 mg/l. Despite the light increase of last year's BOD, the average sample measured was 6.0 mg/l which is well below the permitted limitation and no cause for concern. The Future Effluent BOD₅ concentrations are expected to be within the permitted limit

TSS

The effluent TSS concentration has been 13.1 mg/L for the past five years. Since 2021, the effluent TSS concentration has decreased with last year's average effluent TSS concentration of 3.6 mg/l. With a TSS removal of 93.0% future TSS concentrations are expected to be within the permitted limit.

Three Month Average Daily Flows

The three month average daily flow has averaged 78,190 gallons per day over the period of the past five years. This is below the rated capacity of the plant. The plant is expected to operate within the FDEP requirements for the next five-year renewal period.

OPERATION AND MAINTENANCE PROGRAM

Record Drawings

Kept in the management office.

22501 Trost Boulevard
Bonita Springs, FL 34135

Operation and Maintenance Manual

Kept in the mailbox at the WWTP.

Operation and Maintenance Log

Kept in the mailbox at the WWTP.

General

The plant operator is Water Technology Inc (Gregor St. John). The record keeping and sampling programs are adequate.

COLLECTION SYSTEM EVALUATION

Excessive Infiltration or Inflow

The flow during the summer is half the flows during the peak season. This would indicate that Infiltration and Inflow is not occurring at this facility.

TABLE 4

INFILTRATION ANYSIS

Summer Months (June, July August, September)		
INF BOD	INF TSS	FLOW
158 mg/L	191 mg/L	.046 MGD

Seasonal Months (December, January, February, March)		
INF BOD	INF TSS	FLOW
277 mg/L	183mg/L	.116 MGD

Septic Wastewater

The transmission system provides a timely delivery of the wastewater to the wastewater plant and septic wastewater is not an issue.

Industrial Contributions

There are no industrial contributors of wastewater

PROBLEMS AND DEFICIENCIES

Physical, capacity, performance and operation and maintenance problems:

1. Central lift station: leaking manifold connection.
2. South lift station: clogged drain within valve vault piping.
3. There is no signage indicating the ponds are wastewater effluent and that there should be no swimming or fishing.

Corrective actions:

1. Central lift station: Seal leaking manifold connection.
2. South lift station: fix clogged drain within valve vault piping.
3. Install signage indicating the ponds are wastewater effluent and that there should be no swimming or fishing

UPDATED CAPACITY ANALYSIS

Citrus Park North WWTP

in Lee County

Facility identification # FLA014477

Expiration date: July 13, 2026

Inspection date: November 18, 2025

December 2025

Prepared by:

DRMP, Inc.

1715 Monroe Street, Suite 500


Fort Myers, FL 33901

(239) 206-5093

CERTIFICATIONS

PERMITTEE:

I, James Williams, am fully aware of the contents of this report and believe it to be true and factual, to the best of my knowledge and that the Citrus Park North WWTP receives only domestic wastewater.

 3/4/2026
Owner's Representative Signature Date
James Williams
CPL Citrus Park Owner, LLC
25501 Trost Boulevard
Bonita Springs, FL 34135

ENGINEER:

DRMP, Inc., hereby certifies that the information contained in this report is true and correct to the best of our knowledge and belief and was prepared with sound engineering principals.


 3/12/2026
Ross Hackethal, PE #93615 Date
DRMP, Inc.
1715 Monroe Street, Suite 500
Fort Myers, Florida 33901

TABLE OF CONTENTS

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5. Existing Conditions
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 2. Monthly Average Flows, Three Month Average Daily Flows, and Annual Average Daily Flows
 3. Seasonal Variation Flow
 4. Updated Flow and Loading Information
6. Future Conditions
7. Summary and Conclusions

INTRODUCTION

The wastewater facility at the Citrus Park North Wastewater Treatment Plant is a modular concrete tank plant. The plant consists of the following components:

- One bar screen,
- One 88,000-gallon surge tank,
- One Splitter box,
- Three aeration tanks totaling 196,000 gallons,
- Two digester tanks totaling 67,000 gallons,
- Two 2,600-gallon chlorine contact tanks,
- Five percolation ponds with a total area of 997,752 square feet.

(See Flow Chart in O & M Report).

EXISTING CONDITIONS

PERMITTED CAPACITIES

The permitted capacity of the Citrus Park North Wastewater Treatment Plant is 0.199 million gallons per day (MGD) based on the Three Month Average Daily Flow (TMADF). Flow data is collected using the ultrasonic flow meter on the effluent discharge.

MONTHLY AVERAGE DAILY FLOWS, THREE-MONTH AVERAGE DAILY FLOW, ANNUAL AVERAGE DAILY FLOW

Table 1 shows the monthly average daily flows as well as the annual average daily flows from July 2015 to June 2025. Table 2 contains the calculated three-month average daily flows and the peak three-month average daily flows. Monthly average daily flows, three-month average daily flows, and annual average daily flows are shown graphically in Chart 1.

Over the past ten years, the ADF has averaged 83,650 GPD. The peak three-month average daily flow was 171,000 GPD and occurred in March of 2016. We have seen the data for the average TMADF in the past five years decrease to 78,190 GPD. This flow is well below the permitted capacity and we have no concerns in regard to occupancy as Citrus Park North's occupation has not increased over the past several years.

SEASONAL VARIATION FLOW

Table 3 compares the peak three-month average daily flows to the annual average daily flows. The results indicate that flow rates are slightly higher during the winter months. The average ratio of peak three-month average daily flow to annual average daily flow is 1.64.

TABLE 1

CITRUS PARK NORTH WWTP

**MONTHLY AVERAGE DAILY FLOW &
ANNUAL AVERAGE DAILY FLOW**

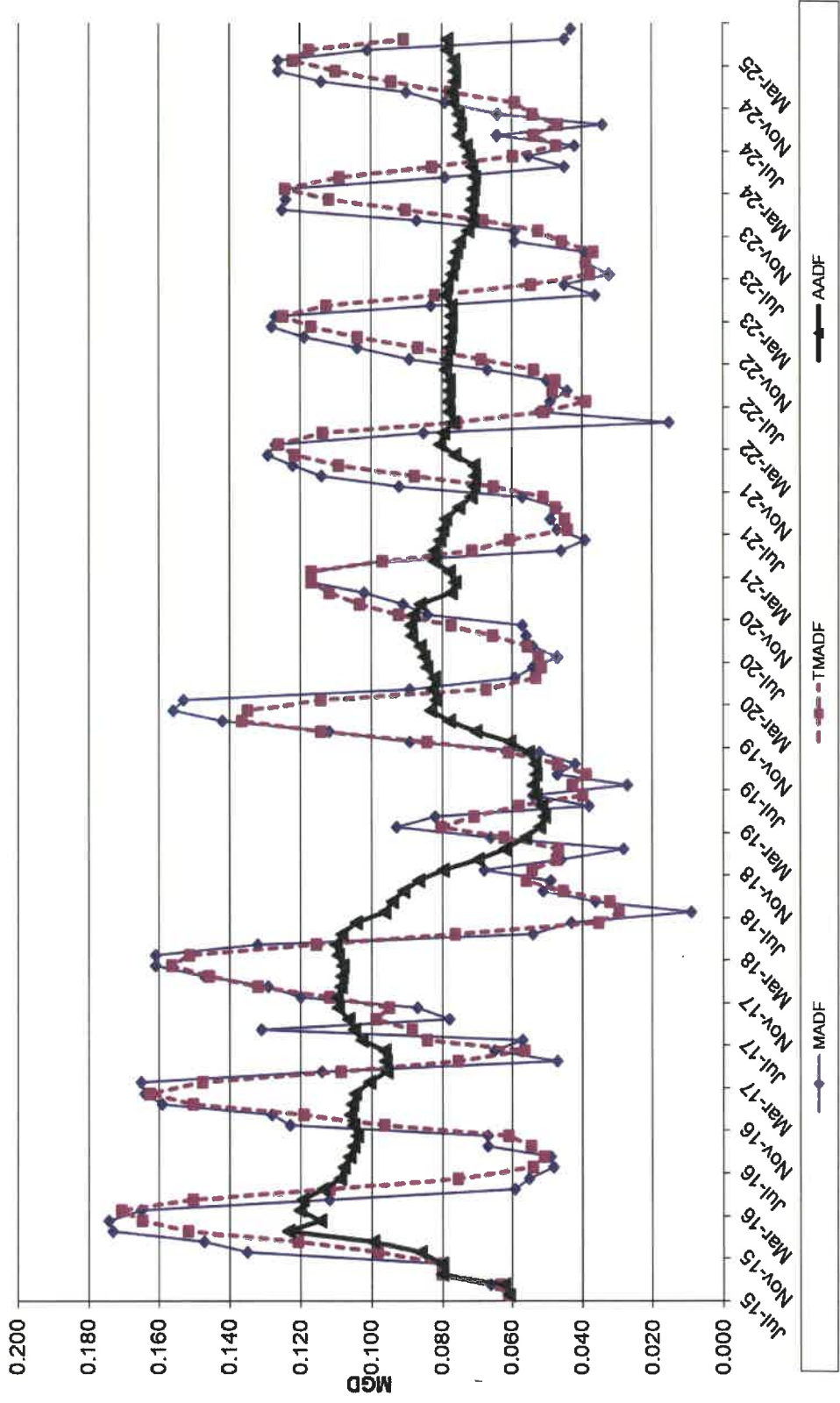
Year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Monthly Average Daily Flow	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD
January		0.173	0.159	0.147	0.028	0.142	0.102	0.122	0.119	0.125	0.114
February		0.174	0.164	0.161	0.066	0.156	0.117	0.129	0.128	0.124	0.126
March		0.165	0.165	0.161	0.093	0.153	0.117	0.127	0.127	0.124	0.126
April		0.112	0.114	0.132	0.082	0.089	0.097	0.085	0.083	0.079	0.101
May		0.059	0.047	0.054	0.038	0.059	0.046	0.015	0.036	0.045	0.045
June		0.055	0.065	0.043	0.054	0.054	0.039	0.052	0.045	0.055	0.043
July	0.061	0.048	0.057	0.009	0.027	0.047	0.047	0.049	0.032	0.042	
August	0.066	0.049	0.131	0.036	0.047	0.054	0.049	0.044	0.039	0.064	
September	0.080	0.067	0.078	0.051	0.042	0.056	0.047	0.05	0.039	0.034	
October	0.080	0.067	0.087	0.049	0.052	0.057	0.057	0.067	0.059	0.064	
November	0.135	0.123	0.12	0.068	0.089	0.084	0.092	0.089	0.059	0.079	
December	0.147	0.128	0.129	0.046	0.112	0.091	0.114	0.104	0.087	0.09	
Annual Average Daily Flow	0.111	0.102	0.110	0.080	0.061	0.087	0.077	0.078	0.071	0.077	0.093

TABLE 2

**CITRUS PARK NORTH WWTP
THREE-MONTH AVERAGE DAILY FLOW &
PEAK THREE-MONTH AVERAGE DAILY FLOW**

Year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Three-Month Average Daily Flow	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD	MGD
January		0.152	0.15	0.146	0.047	0.137	0.112	0.109	0.104	0.09	0.094
February		0.165	0.163	0.156	0.062	0.135	0.117	0.122	0.117	0.112	0.11
March		0.171	0.148	0.151	0.08	0.114	0.117	0.126	0.125	0.124	0.122
April		0.15	0.109	0.116	0.071	0.067	0.097	0.114	0.113	0.109	0.118
May		0.112	0.075	0.076	0.058	0.053	0.072	0.076	0.082	0.083	0.091
June		0.075	0.056	0.035	0.04	0.052	0.061	0.051	0.055	0.06	0.063
July	0.061	0.054	0.084	0.029	0.043	0.052	0.044	0.039	0.038	0.047	
August	0.064	0.051	0.089	0.032	0.039	0.056	0.045	0.048	0.039	0.054	
September	0.08	0.055	0.099	0.045	0.047	0.066	0.048	0.048	0.037	0.047	
October	0.08	0.061	0.095	0.056	0.061	0.077	0.051	0.054	0.046	0.054	
November	0.098	0.096	0.112	0.054	0.084	0.092	0.065	0.069	0.052	0.059	
December	0.121	0.119	0.132	0.047	0.114	0.103	0.088	0.087	0.068	0.078	
Peak Three-Month Average Daily Flow	0.121	0.171	0.163	0.156	0.114	0.137	0.117	0.126	0.125	0.124	0.122

CHART 1
CITRUS PARK NORTH WWTP
OPERATING FLOW RATES



**TABLE 3
SEASONAL VARIATIONS**

Year	Peak Three-Month Average Daily Flow (MGD)	Annual Average Daily Flow (MGD)	Ratio
2015	0.121	0.095	1.272
2016	0.171	0.102	1.679
2017	0.163	0.110	1.483
2018	0.156	0.080	1.960
2019	0.114	0.061	1.879
2020	0.137	0.087	1.574
2021	0.117	0.077	1.519
2022	0.126	0.078	1.621
2023	0.125	0.071	1.754
2024	0.124	0.077	1.613
Average			1.635

UPDATED FLOW AND LOADING INFORMATION

The table below compares the design loading to the actual loading for the last five years (up through June 2025).

**TABLE 4
DESIGN LOADING VS ACTUAL LOADING**

Parameter	TMADF Per Design	Past 5 Years Average
Flow (MGD)	0.199	0.076
Influent CBOD ₅ (mg/L)	250	213
Influent TSS (mg/L)	250	189

The flow seen at the plant has been below the permitted design. The influent CBOD₅ and TSS are below the design levels. The plant is treating the wastewater efficiently.

FUTURE CONDITIONS

POPULATION PROJECTIONS

Citrus Park North WWTP currently serves total of 3,100 residents. The community is fully built out. Therefore, there is no expected population increase within the next five years.

FLOW PROJECTIONS

The TMADF since 2021 is 117,000 GPD with its peak of 126,000 GPD in March of 2022. With no expansion of population or service area, flows should remain constant. Projected flows for the next permitting period should remain below the FDEP permitted flow rate of 199,000 GPD.

SUMMARY AND CONCLUSIONS

TIME REQUIRED FOR THE ANNUAL AVERAGE DAILY FLOW TO REACH THE PERMITTED CAPACITY

The three-month average daily flow will not reach the permitted capacity in the future as the population has been steady, there are no future additional expected services, and the collection system shows no current issues. Therefore, the WWTP is expected to meet all the FDEP requirements for the next five-year renewal period.

**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**

SECTION 4

EXHIBITS

Exhibit 1	Location Map
Exhibit 2	Process Flow Diagram
Exhibit 3	Site Plan
Exhibit 4	Collection System Map

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CITRUS PARK
MOBILE HOME
PARK WWTP

MORTON AVE

E TERRY ST

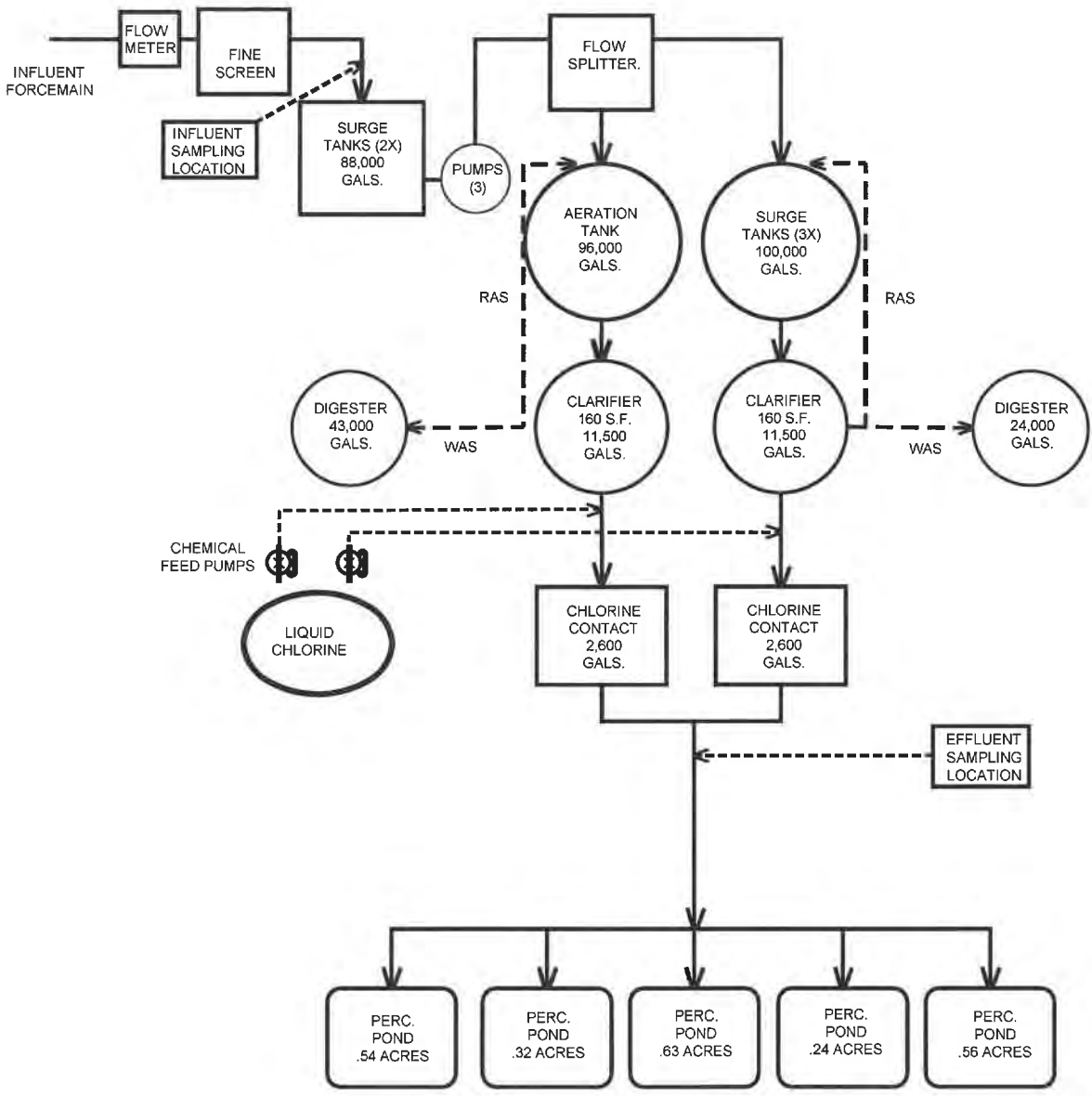
BONITA GRANDE DR



CITRUS PARK WWTP
BONITA SPRINGS
LOCATION MAP

EXHIBIT
1

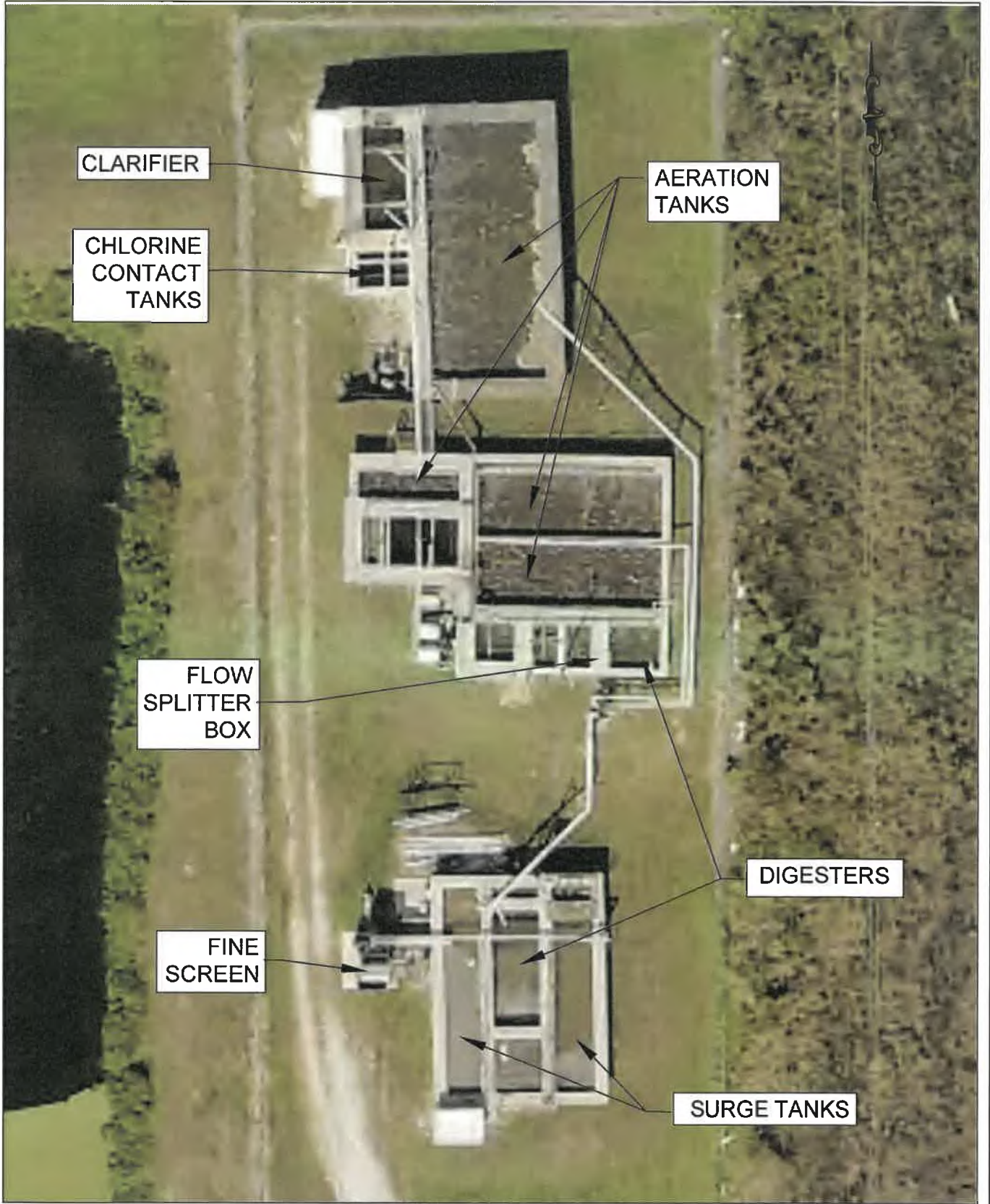
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CITRUS PARK WWTP FLOW DIAGRAM

EXHIBIT
2

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CITRUS PARK WWTP
BONITA SPRINGS
SITE PLAN

EXHIBIT
3



CITRUS PARK NORTH
COLLECTION SYSTEM MAP

EXHIBIT
4

**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**

**SECTION 5
COLLECTION SYSTEM ACTION PLAN**

Collection System Action Plan



Citrus Park North WWTP

Provided by:



Introduction

Rule 62-600.710, F.A.C. requires that collection system flows be routinely reviewed as part of a pipe assessment, repair and replacement plan. The utility is required to have at least a 5-year planning horizon to prevent sanitary sewer overflows and underground pipe leaks for all collection/transmission systems under its control to the extent technically and economically feasible. This Collection System Action Plan provides the required information for the 5-year planning horizon for mitigating sanitary sewer overflows and underground pipe leaks for Citrus Park North.

Wastewater System Description and Contact Information

The Citrus Park North is a mobile home property located in Bonita Springs Florida and serves 3100 resident. The wastewater collection system is composed primarily by 6" PVC lateral system with many cleanouts around the property.

Critical Contacts

The current WWTP operator is Water Solutions of SWFL. The following chart is the contact list:

Position	Name	Phone Number	Responsibility
Water Technology, Inc	Gregor St. John	239 872 4981	Lift station and WWTP operations.
Property Manager	James Williams	202 729 5626	Owner

Inventory

The wastewater collection system consists of the following components:

Component	Size	Material of Construction	Quantity	Units
Sewer Laterals	6-in	PVC	73,409	Feet
Gravity Sewer	6-in	PVC	11,059	Feet
Manholes	3' dia.	Concrete	68	Number
Lift Stations	6' dia.	Concrete	10	Number
Lift Stations	8' dia.	Concrete	1	Number
Force Main	4-in	PVC	11,413	Feet

Collection System Map



System Evaluation Plan

The collection system should systematically be smoke tested every 2-3 years due to low level conditions and sensitivity to rainwater intrusion. In the event smoke testing repairs do not reduce I&I, the pipe collection system will be scheduled to be flushed and TV'd. The manholes should also be inspected to ensure the manhole lids sit watertight and replace the rubber gasketing when necessary.

Maintenance and Repair Plan

COLLECTION SYSTEM O&M PLAN			
COLLECTION SYSTEM		LIFT STATIONS	
Task	Frequency	Task	Frequency
Smoke Test Gravity System	2-3 years	Check Lift Stations for Proper Operation	Per Visit
Inspect Manholes	Annually	Clean Floats /Probe Rods	Bi-Weekly
Respond to Customer Complaints	As Received	Clean Out Wet Wells	Annually
Update Collection System Electronic Maintenance Map with any Breaks or Leaks	As Received	Exercise All Valves	Annually
Check the Collection System for Leaks	Daily	Check Control Valves For Proper Operation	Monthly

Record Keeping

Collection system owner will keep all records of collection system testing, repairs, and WWTP improvements and disclose with engineer at the time of renewal to accurately log and update the collection system plan.

Fats, Oils, and Grease, Wet Wipe and Root Control

The collection system owner will make proper steps to reduce fats, oils, and grease while the operator will take the proper measures to remove if introduced into the WWTP. If wet wipes, feminine products or other items become an issue clogging up the Lift Station or WWTP a bulletin/notice will be provided to all homeowners to teach the importance of preventing damage to the collection system. The collection system owner and operator are both to make routine investigations where tree roots appear problematic to either the collection system or WWTP.

System Resiliency

The collection system owner will make proper investigation when natural disasters or abnormal high rain events occur to identify any issues related to flood mitigation/sea-level rise.

**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**

**SECTION 6
POWER OUTAGE CONTINGENCY PLAN**

Power Outage Contingency Plan



CITRUS PARK NORTH WWTP

Provided by:



System Name: CITRUS PARK NORTH WWTP

FLA ID: FLA014477

Address: 25501 TROST BLVD

City/State/Zip: Bonita Springs / Florida / 33917

Phone Number: (202) 729 - 5626

Fax: _____

Email: james.williams@carlyle.com

I. Purpose

This Power Outage Contingency Plan has been prepared in accordance with Rule 62-600.705(1), F.A.C., and s. 403.086(2), F.S. The purpose of this Power Outage Contingency Plan is to ensure proper response following a power outage to a lift station within your wastewater collection system to minimize the adverse effects that may be caused by a power outage.



3/6/2026

Ross Hackethal, P.E.

Date

Project Engineer

DRMP, Inc.

PE # 93615

This plan is effective beginning on _____ 4 / 1 / 2026
Date: mm / dd / yy

This plan will be reviewed and updated every five years with the WWTP renewal by the responsible engineer to incorporate any changes in contact information, system components, and/or personnel. If critical changes are made in the interim, it is the shared responsibility of the WWTP Owner and Operator to modify and submit to FDEP.

II. Power Outage Contingency Plan

Collection System Overview

The following maps show the location of the site lift stations and wastewater treatment. The sites are generally well built-up but there at times areas subject to high rain events. The gravity collection system consists of service laterals and a central sewer system from the adjoining mobile home lots to the site's lift station, with a short forcemain directly routed to the aeration tank. The lift station is the most critical area related to sanitary sewer overflows which is outfitted with a visible and audio alarm at the control panel. There is also a sign on the fencing of the lift station site to contact the operator in case of an emergency.



WWTP & Lift Station Inventory

The following table provides the critical lift station information which includes the generator plug type, pump design operating points, wetwell depth, pump HP, and electrical draw.

LS Name	CP Generator Plug Type	Pump Design	Model	HP	WW Depth	Volts	Phase
L.S. #1	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1
L.S. #2	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1
L.S. #3	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1
L.S. #4	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1
L.S. #5	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1
L.S. #6	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1
L.S. #7	Universal 4 Pole	*48 @ 32 TDH	AFE43.7	5	8' dia. @ 8.5'	240	1
L.S. #8	Universal 4 Pole	*45 @ 26 TDH	FN-33U	3	6' dia. @ 8.5'	240	1
L.S. #9	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1
L.S. #10	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1
L.S. #11	Universal 4 Pole	*42 @ 23 TDH	FN-32U	2	6' dia. @ 8.5'	240	1

*Estimated

Portable Generator Inventory & Acquisition

Currently Citrus Park North WWTP is supplied with standby generators via their membership with Florida Rural Water Association (FRWA). FRWA has forty two (42) emergency generators ranging in size from 2 kW to 100kW available for loan during an emergency. The facility also has a generator located in a nearby utility building.

Name	CP Generator Plug Type	Volts	Phase
WWTP	Universal 4 Pole	240	3

Power Loss Protocol

In the event of power loss at Citrus Park North, coordination should be immediately made between the Owner and Operator of the facility. The following measures are a general guideline to restore/continue operations:

1. Coordinate efforts to provide portable standby generator to power the lift station and WWTP at the power demand stated within the WWTP & Lift Station Inventory table. If portable generators are not available;
2. Coordinate efforts to provide portable bypass pumps capable of pumping at the design point indicated in the Lift Station Inventory table. If bypass pumps are not available;
3. Owner should monitor the active wastewater level within the on-site lift stations and immediately notify community via the active community mailing list and provide signage at the entry to the community; TREATMENT FACILITY IS OFFLINE, PLEASE LIMIT ALL WATER USAGE UNTIL POWER IS RESTORED AND SIGNAGE IS REMOVED.

The only contribution to wastewater flows are the 3100 residents.

III. General Practices & Maintenance

Generator Guidelines:

- Hook-Up Method: Generators do not simply plug into a piece of equipment that you would like to power. You must install a connection that will enable you to rapidly hook up the generator to your well or sewer lift station pumps, and not accidentally "back feed" electricity into utility company lines.
- Transfer switches can be either automatic or manual and will let you easily switch back and forth between commercial and generator power sources.
- Camlocks are connectors that can be used to connect a generator directly to a critical piece of equipment, such as a pump at a wellhead or lift station.

- Location: Emergency generators must be able to withstand climate extremes and be able to operate under all conditions.
- Environmental considerations: It is important to prevent contamination of source water by fuel, and state requirements, such as containment measures, should be checked. Generators and their fuel storage tanks must be located above potential floodwater levels. Generators should also be protected by using a weatherproof enclosure.
- Siting considerations. A flat surface (e.g., concrete slab) without obstacles is needed for a portable generator. In addition, be sure that the generator is in a well-lit or patrolled area to avoid theft and vandalism.
- For added flexibility, consider a variable frequency drive (VFD).
- Exercise your generator periodically under the actual electrical load required of the unit to keep it ready for use;
- Develop a "start and connect" checklist specific to each individual generator and keep it where staff can easily find it;
- Do not operate the generator in excess of its rated capacity;
- Be sure the generator is properly grounded;
- Keep portable generators outside and at least 10 feet away and downwind from inhabited, enclosed areas to prevent the buildup of carbon monoxide fumes;
- Maintain 3 to 4 feet of clear space on all sides and above a generator for adequate ventilation;
- Perform scheduled maintenance as recommended by the generator manufacturer;
- Incorporate fuel management into the maintenance schedule to ensure availability of clean, reliable fuel;
- Do not refuel the generator while it is running, turn it off first and let it cool, especially if the generator uses gasoline;
- Keep the generator dry by keeping it elevated and away from possible flooding;
- Support electrical cords off the ground and do not let cords run through low-lying areas or puddles;
- Replace any cords with damaged insulation;
- Train all staff on how to operate the generator safely; and
- Wear hearing protection if you have to work close to a generator.

Maintenance Procedures for all Wastewater Treatment Facility Power Generation Equipment.

Diesel fuel supply needs to be turned over every two years to ensure quality fuel. The following scheduled generator runs for Preventative Maintenance should allow the fuel supply to be replenished every two years:

- The following operational protocol will be adhered to for the life of the equipment. 1.0 hours/weekly run under load and 6 hours continuous run under load every May.
- Fuel supply is checked monthly and replenish fuel supplies as needed to allow for contingency plans in the event of an extended power outage. Annual Preventive Maintenance is scheduled with the Original Equipment Manufacturer (OEM) vendor for a complete inspection and factory recommended routine maintenance.
- When a generator is serviced or repaired, test it under load after work is complete.

IV. Communications Plan

Critical Contacts

The current WWTP operator is Water Technology Inc (WTI). The following chart is the emergency contact list in the event of a power outage that lists the responsible operator, property manager, and engineer.

Position	Name	Phone Number	Responsibility
Water Technology, Inc	Gregor St. John	239 872 4981	Lift station and WWTP operations.
Property Manager	James Williams	202 729 5626	Owner
Engineer	Ross Hackethal, P.E.	239 206 5095	FDEP rules and regulations.
FRWA	General Help	850 668 2746 850 893 4581	Membership Assistance with Portable Generators

Communication Guidelines:

- Owner and Operator should actively verify each employee and employees should know who to call in their department should they have questions during emergency operations.
- Employees should be provided with multiple contact numbers.
- Alternate contact numbers, email addresses, phone trees, and means of communication should be established.
- Internal communications should address what, when, and how a message will be provided to utility personnel who are directly and indirectly involved in an incident.
- Internal communications and notification lists should outline the personnel responsible for activating communications, the order in which notification occurs, and the members of the emergency response team.

External Communication:

- Identify the location of the nearest hospital, fire station and police station along with contact information.
- Maintain contact with electric utility provider to obtain power outage duration estimates.
- Notify the regulatory agency (FDEP) if operations and/or water quality or quantity are affected by a power outage, if your utility is running on generator power and what your fuel status is. Keep FDEP and local emergency management updated of status.
- Communications with the power utility and local emergency management must be established prior to restoration of key facilities.

V. Preparation and Post Emergency Checklists

Necessary Preparation Prior to Emergency Conditions

The following checklist is reviewed biannually to ascertain all necessary preparations are accomplished:

Electric Utility Coordination:

- Know key staff at the electric utility, especially the designated account representative, if assigned one.
- Obtain 24/7 emergency contact information for the electric utility and local emergency management agency and plan together for power outage events.
- Determine where the treatment facility and key pumping stations rank on the prioritization list for power restoration.
- Make sure the electric utility has the actual street addresses and locations of the treatment facilities and pumping stations in case street signs are damaged or lost, also include latitude and longitude positions.

Water and Wastewater Utility Preparation:

- Learn what alternative communication methods (e.g., 2-way radios, ham radio operators, satellite phones) are available.
- Maintain membership in Florida Water and Wastewater Agency Response Network (FlaWARN)
- Develop written notification templates to quickly send alerts in emergencies.
- Ensure customer information is regularly updated.
- Participate in local, state and federal emergency preparedness exercises.
- Be sure any contract includes wording that you are a priority customer.

Storm Preparation:

- Conduct any necessary load testing and inventory of generators ahead of the storm. EPA has provided a quick guide for wastewater system generator preparedness.
- Take precautions to protect electrical panels and equipment and any other non-submersible assets from flooding.
- Conduct system maintenance and outreach to reduce potential inflow and infiltration.
- Have enough supplies and personnel pre-staged for regular operations and response activities. This includes chemicals, tools, equipment, fuel, vehicles, personnel, and management systems. Following an emergency, it may be several weeks before supply chains are restored.

- Manage system storage. Even with inflow and infiltration preventative measures in place, heavy rains, widescale flooding and storm surge may introduce excess flow to the system.
- Have a plan for storing, transferring, or disposing of biosolids following a severe weather event. It may be days or weeks before conditions allow for land application. Facilities will need to contact the DEP district office as soon as possible if emergency approval is needed to transfer biosolids to another facility.
- Expect areas prone to flooding to flood again and take precautions to protect electrical panels and equipment, and any other non-submersible assets.
- Have treatment, repair, and backup chemicals, tools, equipment, vehicles, personnel, and management systems arranged to respond to emergency conditions.
- Be prepared to operate components of your utility manually without the aid of computerized systems.

After the Storm

- Document all damage assessments, mutual aid requests, emergency repair work, fuel and equipment used, purchases made, staff hours worked, and contractors used during the response to assist in requesting reimbursement and applying for federal disaster funds
- Check with your electric utility to make sure that all three phases of power are available before switching back to grid power.
- Follow set procedures for taking your facilities off generator power and back onto grid power.
- Conduct an after-action discussion with utility staff to identify portions of the response that went well and areas for improvement.
- Compile damage assessment forms and cost documentation into a single report to facilitate the sharing of information and the completion of state and federal funding applications.
- Develop lessons learned document and/or an after-action report (AAR) to keep a record of your response activities. If needed, update your risk assessment, emergency response plans and contingency plans.

**CITRUS PARK NORTH WWTP
PERMIT RENEWAL APPLICATION**

**SECTION 7
ENGINEERING DATA**

SITE PICTURES



AERATION TANKS



LIFT STATION SEAL LEAK

Date	Eff BOD5 (mg/l)	Inf BOD5 (mg/l)	Eff TSS (mg/l)	Inf TSS (mg/l)	N (mg/l)	Max Day Flow (MGD)	Flow (MGD)	TMADF (MGD)	AADF (MGD)	Max Month (MGD)	Peak 3month (MGD)
Jul-15	3	19	3	59	11.00		0.061	0.061	0.061		
Aug-15	3	11	3	36	10.90		0.066	0.064	0.062		
Sep-15	3	18	4	28	13.70		0.080	0.080	0.080		
Oct-15	3	37	2	70	20.00		0.080	0.080	0.080		
Nov-15	3	49	2	56	9.27		0.135	0.098	0.086		
Dec-15	3	73	5	192	28.60		0.147	0.121	0.100	0.174	0.171
Jan-16	5	167	6	250	32.00		0.173	0.152	0.124		
Feb-16	3	153	6	253	30.70		0.174	0.165	0.115		
Mar-16	4	129	12	296	0.12		0.165	0.171	0.120		
Apr-16	10	72	9	650	17.40		0.112	0.150	0.119		
May-16	10	67	11	112	29.00		0.059	0.112	0.114		
Jun-16	5	67	7	76	27.00		0.055	0.075	0.109		
Jul-16	5	67	4	60	12.00		0.048	0.054	0.108		
Aug-16	5	67	3	34	13.50		0.049	0.051	0.106		
Sep-16	5	67	1	16	7.58		0.067	0.055	0.105		
Oct-16	5	67	6	84	15.60		0.067	0.061	0.104		
Nov-16	12	147	12	190	1.37		0.123	0.096	0.105		
Dec-16	5	142	4	287	34.20		0.128	0.119	0.106	0.165	0.163
Jan-17	5	153	8	660	0.63		0.159	0.150	0.105		
Feb-17	9	239	35	750	0.58		0.164	0.163	0.105		
Mar-17	28	100	4	98	3.20		0.165	0.148	0.101		
Apr-17	8	209	5	400	0.19		0.114	0.109	0.096		
May-17	5	195	6	345	28.50		0.047	0.075	0.096		
Jun-17	5	67	5	17	16.20		0.065	0.056	0.096		
Jul-17	5	67	3	26	15.10		0.057	0.084	0.103		
Aug-17	5	67	3	20	10.10		0.131	0.089	0.105		
Sep-17	5	67	3	52	1.08		0.078	0.099	0.107		
Oct-17	5	67	3	30	17.60		0.087	0.095	0.110		
Nov-17	5	151	5	190	7.19		0.120	0.112	0.110		
Dec-17	9	144	20	70	17.10		0.129	0.132	0.109	0.161	0.156
Jan-18	8	125	24	77	15.30		0.147	0.146	0.108		
Feb-18	9	128	17	93	0.40		0.161	0.156	0.108		
Mar-18	5	129	8	107	1.49		0.161	0.151	0.110		
Apr-18	16	145	21	90	1.52		0.132	0.116	0.110		
May-18	5	67	3	49	1.64		0.054	0.076	0.108		
Jun-18	5	67	1	26	17.60		0.043	0.035	0.104		
Jul-18	5	67	3	18	13.10		0.009	0.029	0.096		
Aug-18	7	67	2	32	8.20		0.036	0.032	0.094		
Sep-18	10	67	3	20	16.90		0.051	0.045	0.091		
Oct-18	5	67	2	38	1.20		0.049	0.056	0.087		
Nov-18	13	234	11	66	0.96		0.068	0.054	0.080		
Dec-18	15	170	5	398	1.08		0.046	0.047	0.070	0.093	0.080
Jan-19	24	139	36	110	0.09		0.028	0.047	0.062		
Feb-19	5	67	10	72	0.18		0.066	0.062	0.056		
Mar-19	5	67	19	56	0.04		0.093	0.080	0.052		
Apr-19	6	69	14	180	0.77		0.082	0.071	0.051		
May-19	5	67	4	49	24.50		0.038	0.058	0.052		
Jun-19	5	67	2	38	5.86		0.054	0.040	0.053		
Jul-19	5	67	3	26	14.50		0.027	0.043	0.054		
Aug-19	5	67	4	24	17.00		0.047	0.039	0.053		
Sep-19	18	67	3	34	4.87		0.042	0.047	0.054		
Oct-19	5	67	10	60	1.37		0.052	0.061	0.055		
Nov-19	8	114	48	70	0.64		0.089	0.084	0.061		

Date	Eff BOD5 (mg/l)	Inf BOD5 (mg/l)	Eff TSS (mg/l)	Inf TSS (mg/l)	N (mg/l)	Max Day Flow (MGD)	Flow (MGD)	TMADF (MGD)	AADF (MGD)	Max Month (MGD)	Peak 3month (MGD)
Dec-19	5	131	4	68	1.22		0.112	0.114	0.070	0.156	0.137
Jan-20	10	145	15	325	0.15		0.142	0.137	0.078		
Feb-20	34	148	7	105	8.38		0.156	0.135	0.083		
Mar-20	15	309	24	1520	0.44		0.153	0.114	0.082		
Apr-20	5	319	4	770	1.32		0.089	0.067	0.083		
May-20	5	271	9	670	7.88		0.059	0.053	0.082		
Jun-20	5	67	6	63	8.78		0.054	0.052	0.084		
Jul-20	5	67	4	31	MNR		0.047	0.052	0.085		
Aug-20	5	77	4	84	25.80		0.054	0.056	0.086		
Sep-20	5	67	2	52	0.00		0.056	0.066	0.089		
Oct-20	5	67	3	40			0.057	0.077	0.089		
Nov-20	22	107	22	73			0.084	0.092	0.088		
Dec-20	5	92	4	118	56.60		0.091	0.103	0.086	0.117	0.117
Jan-21	5	241	1	134			0.102	0.112	0.077		
Feb-21	5	293	2	80			0.117	0.117	0.076		
Mar-21	5	190	22	110	0.10		0.117	0.117	0.078		
Apr-21	5	117	4	100			0.097	0.097	0.082		
May-21	5	85	5	72			0.046	0.072	0.082		
Jun-21	5	67	5	48	0.02		0.039	0.061	0.081		
Jul-21	5	67	5	32			0.047	0.044	0.080		
Aug-21	3	33	9	64			0.049	0.045	0.079		
Sep-21	5	67	5	52	85.60		0.047	0.048	0.075		
Oct-21	5	89	13	156			0.057	0.051	0.072		
Nov-21	5	226	4	836			0.092	0.065	0.071		
Dec-21	5	126	2	216	2.15		0.114	0.088	0.071	0.129	0.126
Jan-22	5	140	3	380			0.122	0.109	0.071		
Feb-22	5	134	2	240			0.129	0.122	0.076		
Mar-22	5	130	5	88	0.22		0.127	0.126	0.081		
Apr-22	6	397	19	320			0.085	0.114	0.080		
May-22	4	167	7	225			0.015	0.076	0.077		
Jun-22	5	427	5	189			0.052	0.051	0.078		
Jul-22	6	163	3	117			0.049	0.039	0.078		
Aug-22	4	269	2	106			0.044	0.048	0.078		
Sep-22	3	410	3	168	0.01		0.050	0.048	0.078		
Oct-22	4	164	7	73			0.067	0.054	0.079		
Nov-22	4	232	24	365			0.089	0.069	0.079		
Dec-22	7	441	10	83	0.09		0.104	0.087	0.078	0.128	0.125
Jan-23	6	157	50	282			0.119	0.104	0.078		
Feb-23	8	242	22	176			0.128	0.117	0.077		
Mar-23	4	190	10	127	0.01		0.127	0.125	0.077		
Apr-23	4	201	16	124			0.083	0.113	0.077		
May-23	8	40	23	39			0.036	0.082	0.079		
Jun-23	4	30	11	8			0.045	0.055	0.078		
Jul-23	6	144	6	113			0.032	0.038	0.077		
Aug-23	7	214	4	180			0.039	0.039	0.077		
Sep-23	3	138	12	50			0.039	0.037	0.076		
Oct-23	2	125	15	178			0.059	0.046	0.075		
Nov-23	2	306	52	187			0.059	0.052	0.073		
Dec-23	2	422	82	214			0.087	0.068	0.071	0.125	
Jan-24	7	563	136	192			0.125	0.090	0.072		
Feb-24	2	365	16	47			0.124	0.112	0.071		
Mar-24	19	241	30	124	0.03		0.124	0.124	0.071		
Apr-24	6	392	19	180			0.079	0.109	0.071		

Date	Eff BOD5 (mg/l)	Inf BOD5 (mg/l)	Eff TSS (mg/l)	Inf TSS (mg/l)	N (mg/l)	Max Day Flow (MGD)	Flow (MGD)	TMADF (MGD)	AADF (MGD)	Max Month (MGD)	Peak 3month (MGD)
May-24	5	252	3	58			0.045	0.083	0.071		
Jun-24	7	224	7	1030	0.03		0.055	0.060	0.072		0.12433
Jul-24	7	132	13	1090			0.042	0.047	0.073		0.12433
Aug-24	3	182	2	88			0.064	0.054	0.075		0.12433
Sep-24	7	141	1	222	0.06		0.034	0.047	0.075		0.12433
Oct-24	2	287	4	206			0.064	0.054	0.075		0.05400
Nov-24	8	219	5	179			0.079	0.059	0.077		0.12433
Dec-24	7	332	1	352	0.01		0.090	0.078	0.077	0.126	0.12433
Jan-25	7	264	2	187			0.114	0.094	0.076		0.12433
Feb-25	8	662	5	291			0.126	0.110	0.076		0.12433
Mar-25	8	317	4	213	0.11		0.126	0.122	0.077		0.12200
Apr-25	7	306	1	244			0.101	0.118	0.078		0.12200
May-25	5	147	2	52			0.045	0.091	0.078		0.12200
Jun-25	4	236	3	98	0.02		0.043	0.063	0.077		0.12200
	EFF BOD	INF BOD	EFF TSS	INF TSS	N		AVG Flow	MAX TMADF	AVG TMADF	BOD REMOVAL	TSS REMOVAL
Past year avg	6.075	268.750	3.600	268.500			0.07733	0.122	0.07800	97.7%	98.7%
3 year Avg.	5.636	254.167	17.103	206.741			0.07600	0.125	0.07589	97.8%	91.7%
5 year Avg.	5.641	212.800	13.137	189.003	9.066		0.07632	0.126	0.07819	97.3%	93.0%



FLORIDA DEPARTMENT OF Environmental Protection

South District
PO Box 2549
Fort Myers FL 33902-2549
SouthDistrict@FloridaDEP.gov

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

February 2, 2024

Ivory Mitchell Gilbert
15275 Collier BLVD
Naples, FL 34119-6750
Email: mitchgilbert@floridautilitysolutions.com

Re: Warning Letter
Citrus Park WWTP
Facility ID No. FLA014477
Lee County - DW

Dear Mr. Gilbert:

A Compliance Evaluation Inspection and a Sanitary Sewer Overflow Preventive Inspection were conducted at your facility on January 8, 2024. During these inspections, possible violations of Chapter 403, Florida Statutes, and Chapters 62-160, 62-520, 62-600, 62-602, 62-604, 62-610, 62-620 and 62-640 of the Florida Administrative Code, were observed.

During these inspections, Department personnel noted the following:

- The Facility diverted wastewater from the headworks without Department approval.
- The calibration/verification log did not provide acceptance criteria for the pH buffers.
- The Facility failed to collect and analyze samples as required.
- The Facility did not provide their Chain of Custody.
- The facility did not have an O&M Manual.
- The Facility did not have the most recent hauling receipts.
- The Facility did not have a Collections System O&M Manual.
- The Facility did not have a Sanitary Sewer Overflow Response Plan.
- A review of the DMR revealed deficiencies transcription and calculation issues.
- The Facility failed to submit the annual Reclaimed Water and/or Effluent Analysis Report.
- The Facility failed to report an SSO.
- There are missing and late DMR submissions.

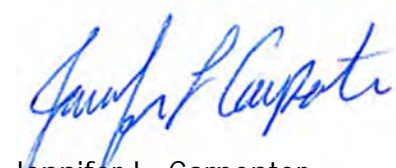
- There was excessive corrosion in the headworks.
- There was evidence of an overflow at the headworks.
- The bar screen was bypassed and out of operation.
- The container for screenings and grit had holes in it.
- There were solids discharging over the weir in the clarifier.
- The diffusers throughout the plant were severely corroded and many were inoperable.
- The RAS line and the return line box were causing excessive splashing.
- There were leaks in the air lines to the aeration basins.
- Only three of the Facility's seven blowers were operational at the time of the inspection.
- The Facility did not have adequate spare parts to make repairs.
- One digester was offline, and the other digester had a hole in the wall allowing it to mix with the aeration basin next to it.
- The surge tank did not have two working pumps.
- The chlorine contact chamber (CCC) effluent was turbid and brown.
- The chlorine injection point was not providing adequate chlorine to all portions of the CCC.
- The stilling wells contained excessive sludge, rags, and vegetation.
- There are multiple cracks in the tank walls.
- The cover for Lift Station #1 was not locked.
- Lift Station #1 only had one functional pump.
- There were rags and other debris tangled around the diffusers in the aeration basins.
- The influent line from the splitter box to the aeration basins was sagging.
- The waste activated sludge (WAS) line is not properly located.
- The Facility did not provide the flow meter calibration.
- The Facility Failed to replace malfunctioning equipment.
- One of the sets of steps at the Facility was unsafe.
- The fencing around the disposal site had a damaged gate and was not providing adequate access control.
- There were missing and late groundwater monitoring reports.
- A review of the DMR revealed groundwater monitoring exceedances.
- The groundwater monitoring wells did not meet DEP requirements.

Violations of Florida Statutes or administrative rules may result in liability for damages and restoration, and the judicial imposition of civil penalties, pursuant to sections 403.121, Florida Statutes.

Please contact Alex McSurley, at (239) 344-5679, within **15 days** of receipt of this Warning Letter to arrange a meeting. The Department is interested in receiving any facts you may have that will assist in determining whether any violations have occurred. Any document submittals can be made to our email mailbox at SD-WWinspect@FloridaDEP.gov or may be mailed to the above address. You may bring anyone with you to the meeting that you feel could help resolve this matter.

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

Sincerely,



Jennifer L. Carpenter
Director of District Management
South District Office
Florida Department of Environmental Protection

Enclosure: Inspection Report

ec: Gregor St. John (gregor@wti.services)
Allen Slater (Allen.Slater@frwa.net)



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION WASTEWATER COMPLIANCE INSPECTION REPORT

Facility Details

Facility Name	Citrus Park WWTP			WAFR ID	FLA014477	
Physical Address	25501 Trost Blvd			City, State, Zip	Bonita Springs, FL 34135-6422	
County	Lee			Facility Phone #	(239) 513-0445	
Permit Issued:	5/4/2021			Permit Expiration:	7/13/2026	
Facility Type	Domestic Wastewater			Is the Facility NPDES (Y/N)		No
Latitude	Degrees °	26	Minutes '	22	Seconds "	20.10
Longitude	Degrees °	-81	Minutes '	45	Seconds "	15.84

Inspection Details

Inspection Type	Entry Date		Exit Date		
CEI	1/8/2024		1/8/2024		
SSOP	Entry Time (HH:MM AM/PM)		Exit Time (HH:MM AM/PM)		
	9:30 AM		11:30 AM		
Sampling Taken (Y/N)	No	RQ#	NA	QA Conducted (Y/N)	No
Name(s) and Title of Field Representatives(s)		Operator Certification		Email	Phone Number
Gregor St. John		WW Class A - 0008069		gregor@wti.services	(239) 872-4981
Name(s) and address of Permittee / Designated Rep.		Title		Email	Phone Number
Ivory Mitchell Gilbert 15275 Collier Blvd. Naples, FL 24119-6750		President		mitchgilbert@floridautilitysolutions.com	(239) 513-0445

Inspector Information

Name(s) and Signature(s) of Inspectors(s)	District Office/Phone Number	Date
Alex McSurley	SD / (239) 344-5679	1/31/2024
Name and Signature of Reviewer	District Office/Phone Number	Date
Deanna Newburg	SD / (239) 344-5677	2/1/2024

Facility Compliance Eval Areas

<i>IC = In Compliance; MC = Minor Out of Compliance; NC = Out of Compliance; SC = Significant Out of Compliance; NA = Not Applicable; NE = Not Evaluated Significant Non-Compliance Criteria Should be Reviewed when Out of Compliance Ratings Are Given in Areas Marked by a "X"</i>							
Overall Compliance Determination				Significant Out of Compliance			
NC	*Permit	IC	Laboratory	NC	Facility Site Review	NC	*Effluent Quality
IC	*Compliance Schedules	NC	Sampling	NC	Flow Measurement	NC	*Effluent Disposal
SC	*Records & Reports	NC	Biosolids	NC	*Operation & Maintenance	NC	*Groundwater
SC	SSO Survey	NE	Other	NA	Nutrient Management Plan	NA	Access Control
NA	Site Restrictions & Setbacks	NA	Odor/Nuisance	NA	Site Monitoring	NA	MLPW Disposal
NA	Manure Solids						

Clear Report	Hide/Unhide Placeholders	Generate Blank Rows (for field paper setup)	Generate Deficiency & Observation Rows	Finish Inspection Report Form
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Single Event Violations (“SEV” SNC SEVs)

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

Permit

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
*Is the permit current?	Yes			
Is a copy of the permit available onsite?	Yes			
Is the facility operated in accordance with the permit?	Yes			
*Was the facility constructed or modified with an appropriate or valid permit issued by the Department?	N/A			
Has the facility submitted the permit renewal application 180 days prior to the expiration date?	N/A			
If the permittee for the facility has changed did the department receive notification of this change?	N/A			
If the permit is accompanied by a Consent Order or Administrative Order, re, they abiding by the conditions of the order?	N/A			
Is wastewater from a portion of the treatment process diverted with Department approval?	No			
*Is the facility discharging to waters of the state with an appropriate FDEP permit?	N/A			
*Was the facility free from unpermitted discharge, bypass, collection system, or residuals with a high potential for water quality or health impacts?	Yes			
Is the facility free from any Permit violation not listed above that needs to be addressed?	Yes			
<ul style="list-style-type: none"> • Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a "X" • Questions with "No" responses indicate deficiencies • Questions with "N/A" responses do not apply to the facility 				
Deficiencies & Corrective Actions:				
Wastewater was diverted from a portion of the treatment process without department approval. [62-620.300 (2) F.A.C., UNBY]	Deficiency: (Narrative) At the time of the inspection, it was noted that the plant headworks (the bar screen and the surge tanks) were offline and wastewater had been diverted to the flow splitter box.			
	Corrective Action(s): (Narrative) Please divert wastewater back to the permit approved process flow and submit documentation to the Department demonstrating this has been completed. If the headworks remain inoperable, a permit modification may be necessary.			
Observations:				
Department records indicate that the current operating permit will expire on July 13, 2026. F.A.C. Rule 62-620.335 (1) states that a permittee shall submit an application to renew the existing permit at least 180 days before the expiration date of the existing permit. Timely and sufficient submittal of the renewal application and permit processing is important (and in your best interest) as it automatically extends the expiration date on the existing permit until the Department takes final action on the renewal application. A tardy application could result in non-compliance. Your renewal application and permit processing fee must be submitted no later than January 14, 2026.				

Compliance Schedule

Compliance Rating	In Compliance			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
If the facility has a compliance schedule in a permit, Administrative Order or Enforcement Action are they in compliance with the schedule?	Yes			
*Are the Compliance Date(s), Construction Milestone(s), Enforcement Order Schedule(s) or Final Compliance Date started/completed within 90 days of the due date?	Yes			

Has the facility completed construction and submitted a Notification of Completion of Construction for Wastewater Facilities or Activities (Form 62-620.910(12)), if required?	Yes
Has the Notification of Availability of Record Drawings and Final Operation and Maintenance Manuals (Form 62-620.910(13)) been submitted as required?	Yes
If the facility is under a Toxicity Corrective Action Plan, are they in compliance with the plan?	N/A
Is the facility free from any Compliance Schedule violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • <i>Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*”</i> • <i>Questions with “No” responses indicate deficiencies</i> • <i>Questions with “N/A” responses do not apply to the facility</i> 	
Observations:	
Please refer to Table A in the Appendix for additional details regarding the Facility’s compliance schedule.	

Laboratory

Compliance Rating	In Compliance			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
Is there a current copy of the laboratory certification onsite?	Yes			
If the facility has an onsite laboratory does it have a Florida Department of Health Environmental Laboratory Certification Program certification?	N/A			
Facility DOH Certification #	N/A N/A			
Contract Lab Name and DOH Certification #	Advanced Environmental Laboratories (Fort Myers) – E84492; Sander’s Laboratories, Inc (Nokomis) – E84380 Yes			
Does the onsite laboratory use sample analysis methods prescribed in 40 CFR part 136 or a test method that has gone through the EPA alternative method approval process?	N/A			
Does the facility have standard operating procedures that follow the methods set in 62-620.10 (18) F.A.C. including 40 CFR Part 136; including required instrumentation, glassware cleaning, reagent/standard use, and troubleshooting procedures?	N/A			
Does the facility have a QA/QC program with a written QA/QC manual as required by 40 CFR 122.41 that is up to date and available for review?	N/A			
Does the facility follow the procedures set in the QA/QC manual; including instrument calibration/maintenance, checks on standard solutions, sample analysis precision/accuracy limits on a prescribed bases and QC samples (duplicate, spiked, blank in at least 10%)?	N/A			
Is the detailed record complete and available for review for each set of analyses performed including the order of calibration, QA/QC, bracketing, and samples analyzed?	N/A			
Does the facility have QA/QC records on the reagent preparation, instrument calibration/maintenance, incubator temperature and purchase of laboratory supplies?	N/A			
Does the facility's laboratory documentation of the sample results use qualifier codes when sample QA/QC fall outside acceptable precision and accuracy limits set in the QA/QC manual?	N/A			
Does the facility's laboratory take and record corrective actions or trouble shooting steps when data falls out of the precision and accuracy limits?	N/A			

Are records of standard(s) and reagent(s) preparation maintained at the laboratory?	N/A
Is the laboratory maintaining adequate records for reagent preparation(s)?	N/A
Does the laboratory have a system for uniformly recording, correcting, processing and reporting data; including formulas, significant figures, rounding rules, units, cross-checking calculations?	N/A
Is the facility's laboratory adequate for analyzing samples; including pure water, clean bench space for instrument use/storage free of contamination, necessary equipment, vibration free area, ventilation, humidity and temperature control?	N/A
Does the Laboratory meet NELAC and EPA standards including dry and clean sample storage locations, sample custodian(s) to ensure upon receipt of samples, proper sample storage, preservation and custody documentation?	N/A
Does the facility use appropriate standards that are prepared in volumetric glassware, checked against reliable primary standards, labeled properly, stored in clean containers, and discarded when expired or degraded?	N/A
Does the facility's laboratory analyst(s) demonstrate competency and appropriate training; including ability to follow procedures, ability to meet precision and accuracy limits, knowledge of equipment and analytical methods.	N/A
If the facility test requires temperature measurement, is there a thermometer present that is routinely calibrated against NIST thermometer within calibration date range?	N/A
Is the sample refrigerator temperature correct to meet the preservation requirements for the samples stored within?	N/A
Is the facility free from any Laboratory violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • <i>Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a "*"</i> • <i>Questions with "No" responses indicate deficiencies</i> • <i>Questions with "N/A" responses do not apply to the facility</i> 	
Observations:	
The Facility's laboratory certification will expire on June 30, 2024.	

Sampling

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
In facility logbooks or other documentation, are the daily records appropriately recorded, including composite sampler or other temperatures, and daily calibration of meters.	Yes			
Does the facility maintain records of their daily calibration of their pH meter, Chlorine meter, Dissolved Oxygen meter?	Yes			
Does the facility maintain records of their daily checks of their in-line meter(s) with their field meter(s)?	N/A			
Do field sheets document that the collection and analysis of field tests were analyzed within the 15-minute holding time.	N/A			
Are meters calibrated and sample analysis conducted at the facility done in accordance with DEP SOP and NELAC guidelines? (Calibration frequency and sample bracketing for pH, Total Residual Chlorine (TRC), Turbidity, DO)	No			
Are all the primary and secondary standards used to calibrate and verify meters, used prior to expiration dates and verified against primary standards appropriate for pH, TRC, Turbidity, DO?	Yes			
Are the inline meters reading within established limits compared to the bench meters? (TRC ≤ 20%, Turbidity ≤ 20%, pH 0.2 SU)	N/A			
Were safe access points for obtaining representative influent/effluent samples available?	Yes			

Are influent sampling points put prior to internal facility return lines including supernatant, filter backwash and return activated sludge (RAS)?	Yes
Are samples being collected and analyzed as required by the permit or enforcement action; including location, type (grab/composite), time, and frequency?	No
Are samples being collected in the proper containers, preserved and analyzed in appropriate hold times in accordance with 40 CFR Part 136, Table II?	N/A
If the facility has a composite sampler with cooling system at the influent/effluent sampling location is there a thermometer present in the sampler that is annually checked against NIST thermometers?	N/A
Is composite sampling being conducted appropriately; including purging, sampling velocity at least 2fps, clean tubing, individual sample volume of at least 100 mL, sample storage of <6°C preservation, hold times and representative samples?	No
Did the facility have their Chain of Custody records?	No
If sampling was conducted and observed during the inspection did the sampling follow DEP SOP requirements?	N/A
Did the facility collect and/or analyze routine or follow-up toxicity samples as required by permit or enforcement action?	N/A
Is the facility free from any Sampling violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a "*" • Questions with "No" responses indicate deficiencies • Questions with "N/A" responses do not apply to the facility 	
Deficiencies & Corrective Actions:	
Are meters calibrated and sample analysis conducted at the facility done in accordance with DEP SOP and NELAC guidelines? (Calibration frequency and sample bracketing for pH, Total Residual Chlorine (TRC), Turbidity, DO) [62-160.210 (1) F.A.C., 62-160.800 (1)(a) F.A.C., DEP SOP FT 1000]	<p>Deficiency: (Narrative) A review of the calibration/verification log revealed that the log did not include acceptance criteria for the pH buffers that are used.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the calibration/verification log has been updated to include acceptance criteria for all buffers or standards used.</p>
The facility failed to collect and/or analyze samples as required by permit or enforcement action. [62-600.650 (1) F.A.C., 62-620.610 (18) F.A.C., 62-160.210 (1) F.A.C., 62-600.660 (1) F.A.C., DEP SOP FS 2400, ANCV]	<p>Deficiency: (Narrative) The Facility failed to collect bi-weekly samples at the required frequency. Additionally, the facility is not collecting composite samples for CBOD (influent and effluent), and TSS (influent and effluent)</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department detailing how the Facility will ensure that sampling is conducted according to the permit requirements.</p>
Is composite sampling being conducted appropriately;	<p>Deficiency: (Narrative) The Facility is not collecting composite samples as required by the permit for CBOD (influent and effluent), and TSS (influent and effluent).</p>

including purging, sampling velocity at least 2fps, clean tubing, individual sample volume of at least 100 mL, sample storage of =6°C preservation, hold times and representative samples? [62-160.210 (1) F.A.C., 62-160.800 (1)(a) F.A.C., DEP SOP FS 2400, 62-160.300 F.A.C., 40 C.F.R. 136 Table II]	<p>Corrective Action(s): (Narrative) Please submit documentation to the Department detailing how the Facility will ensure that sampling is conducted according to the permit requirements.</p>
Did the facility have their Chain of Custody records? [62-160.210 (1) F.A.C.]	<p>Deficiency: (Narrative) The Facility failed to provide their Chain of Custody records.</p>
	<p>Corrective Action(s): (Narrative) Please submit the Facility's Chain of Custody records for the months of December 2023 and October 2023 to the Department for review.</p>
Observations:	
No additional observations or deficiencies were noted.	

Records and Reports

Compliance Rating	Significant Out of Compliance			
Does this section apply to the facility?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
Are the entries in the operator logbook clear, concise, informative and relevant?				Yes
Was copy of the current O&M manual available at the time of the inspection?				No
Is there a current operator license?				Yes
Is there a current RPZ certification?				N/A
Is there a copy of the current Operating Protocol for Part 3 Reuse?				N/A
Does the facility have and maintain their Spill Prevention Control and Counter measurement (SPCC) Plan?				N/A
Are all required documents and reports available at the plant well organized and complete?				No
Does the facility maintain the records onsite for the required retention period?				No
Discharge Monitoring Reports (DMRs) Review Period				1/1/2021 – 12/31/2023 Yes
Are the discharge monitoring reports completed properly?				No
Are the DMRs submitted on the proper form?				Yes
Is an authorized representative signing the DMRs?				Yes
Has the permittee submitted an annual Reclaimed Water and/or Effluent Analysis Report?				No
Does the facility submit their monitoring results for Giardia and Cryptosporidium in a timely manner?				N/A
A review of the last toxicity test did not reveal any deficiencies?				N/A
Has the facility submitted all report(s) during the review period that are required by rule, permit, enforcement action or inspection activity, other than DMRs?				No

*Has the facility timely submitted DMRs as required by rule, permit, or enforcement action? (If either reports are >30 days late meets SNC criteria)	No
Has the facility submitted all final compliance schedule reports as required by rule, permit, or enforcement action?	N/A
Has the permittee notified the Department of any event or activity that requires notification as required by permit or rule?	No
*Are records or reports free from falsified data?	Yes
Is the facility free from any Records and Reports violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • <i>Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*”</i> • <i>Questions with “No” responses indicate deficiencies</i> • <i>Questions with “N/A” responses do not apply to the facility</i> 	
Deficiencies & Corrective Actions:	
Was copy of the current O&M manual available at the time of the inspection? [62-600.720 F.A.C., 62-620.350 F.A.C.]	<p>Deficiency: (Narrative) The Facility did not have a copy of the current O&M Manual onsite.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the Facility has created an O&M Manual and that it is available at the Facility.</p>
Are all required documents and reports available at the plant well organized and complete? [62-4.160 F.A.C., 62-160.240 F.A.C., 62-160.340 F.A.C., 62-620.350 F.A.C.]	<p>Deficiency: (Narrative) At the time of the inspection, the following documents were not available:</p> <ul style="list-style-type: none"> • The Facility O&M Manual. • The most recent sludge hauling receipts. • The Collections System O&M Manual. • The Facility’s Sanitary Sewer Overflow Response Plan. • Copies of the Facility’s Chains of Custody for both effluent sampling and groundwater sampling. • Lab report. <p>Corrective Action(s): (Narrative) Please ensure that the noted missing documents have been made available at the Facility and submit copies to the Department for review.</p>
The facility failed to maintain records for the required retention period. [62-620.350 (2) F.A.C., FMRR]	<p>Deficiency: (Narrative) At the time of the inspection, the following documents were not available:</p> <ul style="list-style-type: none"> • The Facility O&M Manual. • The most recent sludge hauling receipts. • The Collections System O&M Manual. • The Facility’s Sanitary Sewer Overflow Response Plan. • Copies of the Facility’s Chains of Custody for both effluent sampling and groundwater sampling. • Lab report. <p>Corrective Action(s): (Narrative) Please ensure that the noted missing documents have been made available at the Facility and submit copies to the Department for review.</p>
Are the discharge monitoring reports completed properly? [403.161(1)(b) F.S., 62-600.680 F.A.C.]	<p>Deficiency: (Narrative) A review of the DMRs revealed deficiencies. Please refer to Table D in the Appendix for additional details.</p> <p>Corrective Action(s): (Narrative) Please correct and resubmit the noted calculation and transcription errors.</p>
	Deficiency: (Narrative)

Has the permittee submitted an annual Reclaimed Water and/or Effluent Analysis Report? [403.161(1)(b) F.S., 62-600.680 F.A.C.]	A records review revealed the Facility has not submitted the annual Reclaimed Water/ or Effluent Analysis Report for 2022 or 2023.
	<p>Corrective Action(s): (Narrative)</p> <p>Please submit the missing reports as soon as possible and ensure that all reports required by the permit are submitted by the permit required due date going forward.</p>
The facility failed to submit any report required by rule, permit, enforcement action or inspection activity except for DMRs. [62-610.870 (3) F.A.C., 62-610.865 (11) F.A.C., 62-600.405 F.A.C., 403.161(1)(b) F.S., FRPT]	<p>Deficiency: (Narrative)</p> <p>At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p>
	<p>Corrective Action(s): (Narrative)</p> <p>Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
The permittee failed to submit any DMR required by rule, permit, or enforcement action in a timely manner. [403.161(1)(b) F.S., 62-600.680 F.A.C., 62-620.610 (18)(a) F.A.C., FDMR]	<p>Deficiency: (Narrative)</p> <p>A review of the DMRs revealed missing and late DMRs. Please refer to Table F in the Appendix for additional details.</p>
	<p>Corrective Action(s): (Narrative)</p> <p>Please submit all noted missing DMRs and ensure that all reports are submitted by the permit required due date in the future.</p>
The permittee failed to notify the department of any event or activity that requires notification as required by permit or rule. [403.161(1)(b) F.S., 62-4.130 F.A.C., RSWP]	<p>Deficiency: (Narrative)</p> <p>At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p>
	<p>Corrective Action(s): (Narrative)</p> <p>Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
Observations:	
Please refer to Table B of the Appendix for additional details regarding operator licenses for the new operations company.	

Facility Site Review

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
The headworks was free from excessive corrosion.	No			
The headwork is free from evidence of recent overflows.	No			
Is the odor control system operational at the headworks?	N/A			
Is the comminutor operational at the headworks?	N/A			

Is the grit separator operational at the headworks?	N/A
Is the bar screen cleaned on a routine basis?	N/A
Is the mechanical bar screen functioning as intended?	No
Are screenings and grit being collected from the headworks in suitable containers?	No
Rags, grit and/or screening are being disposed of properly.	N/A
Are screenings and grit from the headworks being disposed at a Class I Landfill?	N/A
Are records of the disposal of the screenings and grit collected at the headworks available?	N/A
The leachate from the screening dumpster(s) is piped to the headworks and not onto the ground.	No
Is the clarifier free from solids discharging over the weir(s)?	No
Is the clarifier free from excessive sand and/or grit accumulation?	N/A
Is the clarifier free from excessive scum, algae and/or trash overflowing the weir?	No
Does the skimmer appear to be functional in the clarifier?	Yes
Is the sludge collector and pump functional in the clarifier?	Yes
Are the clarifier weir(s) level?	Yes
Is the clarifier free from short circuiting with loss over the weir?	Yes
Are the aeration basins diffusers free from clogs and providing adequate mixing?	No
Was the time clock or manual controls for the aeration system operational at the time of the inspection?	Yes
Is the RAS line properly located?	Yes
The RAS line was free from excessive splashing that could cause solids to be discharged outside the tank.	No
The mixed liquor (MLSS) in the oxidation ditch was appropriately colored with no black coloring.	N/A
Is even distribution of air observed in the aeration basin?	No
Are the air line(s) to the aeration basin(s) free from leaks?	No
The brushes and paddles in the oxidation ditch were all in good working order.	N/A
Is the velocity in the oxidation ditch sufficient to prevent settling of solids?	N/A
Are dual blower motors present as required by rule?	Yes
Are the blower motors equipped with belt guards?	Yes
The blower motors are free from excessive noise.	Yes
Are all the blower motors present and operational at the time of the inspection?	No
Are spare parts and a second standby blower motors stored onsite?	No
Is the electrical box wiring for the blower motors adequately protected?	Yes
Were the tank contents in the aerobic digester(s) well mixed?	No
Are the digester(s) free from excessive odors and/or foaming?	Yes
Is the digester at the appropriate operational capacity?	Yes
Are there two functioning pumps in the surge tank(s)?	No
What was the biomass color of the trickling filter at the time of the inspection?	N/A N/A
Is trickling filter media free from excessive ponding?	N/A
Are center columns and distribution arms of the trickling filter free from leaks?	N/A
Are the distribution arm orifices free from clogs, trash and/or scum resulting in uneven distribution of flow on the trickling filter media?	N/A
Is the RBC free from black biomass indicating solids and/or BOD loading?	N/A
Is the RBC free from white biomass indicating the presence of bacteria, which feed on sulfur compounds?	N/A
Is the RBC free from excessive grinding/whining noise(s) from the motor, drive shaft, and bearings?	N/A
Are all RBC rotating disks and/or paddles present and in good working?	N/A

Is the RBC unit drive shaft free from excessive vibration?	N/A
Are all the aerators in the lagoon operational at the time of the inspection?	N/A
Is the base of the lagoon free from lateral seepage at the time of the inspection?	N/A
Does the treatment lagoon have adequate freeboard space?	N/A
Is the treatment lagoon properly secured to prevent unauthorized access?	N/A
Is the treatment lagoon free from excessive foaming?	N/A
Are the treatment lagoon berms properly stabilized?	N/A
Is the Chlorine Contact Chamber (CCC) effluent clear and free from scum, solids accumulation and debris?	No
Are the baffles in the CCC functioning as intended?	Yes
Does the chlorine injection point provide optimal mixing to occur in the CCC?	No
Is the CCC chlorine pump operational, providing adequate chlorine supply for disinfection and at the permitted location?	No
Is the chlorine storage area protected from the elements?	Yes
Is the alarm indicator for the chlorine system operational?	N/A
Is the chlorine supply covered in frost indicating an issue with the system?	N/A
Is the fan inside the chlorine room operational?	N/A
Are the chlorine scales operational?	N/A
Is an operational Self-Contained Breathing Apparatus (SCBA) available for the chlorine room?	N/A
Are the chlorine gas cylinders properly secured?	N/A
Is a fresh supply of ammonia available to test for leaks in the gas chlorination system?	N/A
Do the UV ballast control boxes have adequate ventilation?	N/A
Does the plant staff have access to UV protective eyeglasses?	N/A
Is the facility maintaining adequate records of UV lamp operating hours?	N/A
Are the UV lamps and ballast being cleaned in accordance with the manufacturer's recommendation?	N/A
Does the facility have an adequate inventory of spare parts for the UV system?	N/A
Is the facility conducting routine performance checks on the UV system?	N/A
Is the UV intensity monitoring equipment operational?	N/A
Is the stilling well free from a thick layer of sludge and/or trash?	No
Is the chlorine contact chamber providing a minimum contact time of 15 minutes?	Yes
Chlorine and SO2 cylinders marked with empty/full tags?	N/A
Is the automatic SO2 feed operational within de-chlorination process?	N/A
Is the SO2 system free from frost within de-chlorination process?	N/A
Are the bisulfite (SO2) gas cylinders properly secured for de-chlorination?	N/A
Was there adequate ventilation in the SO2 room?	N/A
Is the filter media free from solids that could cause plugging and/or overflow?	N/A
Is the land application system being maintained?	Yes
If an injection well was plugged or abandoned, was it completed appropriately with DEP approval?	N/A
If a well was constructed, was it permitted prior to beginning construction and constructed as required by permit?	N/A
Is the injection well Operation and Maintenance done satisfactorily?	N/A
Is there adequate access to all monitoring locations?	Yes
Is the exterior of the tanks, wall, and/or pipes of the facility free from leaks?	No
Are the facility grounds clean and well maintained?	Yes
Is the required signage adequate?	Yes
The facility was free from odors emanating from the facility.	Yes

The facility was free from excessive noise which could be heard beyond the boundaries of the facility.	Yes
Is the facility providing safety measures at all times including adequate lighting?	Yes
The facility is disposing of sludge appropriately, with no sludge being disposed of on the facility grounds.	Yes
Was an alternative power source available at the facility?	N/A
Is the onsite generator tested under load on a monthly basis?	N/A
Are records available for the testing of the generator?	N/A
Is the area around the lift station(s) maintained?	Yes
Are there warning signs with emergency contact information on and/or around the lift station(s)?	Yes
Does the facility have a fence around their lift station(s)?	N/A
Is the gate around the lift station and the cover to the lift station locked?	No
Is the cover to the lift station(s) free from safety hazards?	Yes
Are there two functioning pumps that alternate?	No
Is the electrical panel in good working order and free from needed repair and/or replacement?	Yes
Was the collection system or lift station free from offsite objectionable odors?	Yes
The lift station visual and audio alarm operating satisfactory?	Yes
Are the potable water supply lines and the facility free from cross connections?	N/A
Is an RPZ in place and free of leaks on all potable water supply lines?	N/A
Is there a record of testing available on the RPZ?	N/A
Is the facility free from any Facility Site Review violation not listed above that needs to be addressed?	No
<ul style="list-style-type: none"> • Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*” • Questions with “No” responses indicate deficiencies • Questions with “N/A” responses do not apply to the facility 	
Deficiencies & Corrective Actions:	
The headworks was free from excessive corrosion. [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that the diffusers in the Facility’s surge tanks were severely corroded and inoperable.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the diffusers for the surge tank have been replaced.
The headwork is free from evidence of recent overflows. [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.
	Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.
Is the mechanical bar screen functioning as intended? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that the bar screen at the headworks was not operational, and flow had been diverted around it.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the necessary repairs have been made to bring the bar screen back online.
	Deficiency: (Narrative)

<p>Are screenings and grit being collected from the headworks in suitable containers? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>At the time of the inspection, the container for collecting screenings and grit at the headworks was severely corroded and, as a result, had several holes that would allow leachate to drain to the ground if it were in use.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that a new container for collecting screenings and grit has been provided.</p>
<p>The leachate from the screening dumpster(s) is piped to the headworks and not onto the ground. [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, the container for collecting screenings and grit at the headworks was severely corroded and, as a result, had several holes that would allow leachate to drain to the ground if it were in use.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that a new container for collecting screenings and grit has been provided.</p>
<p>Is the clarifier free from solids discharging over the weir(s)? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that the clarifier was not achieving proper settling, and solids were noted discharging over the weir.</p> <p>Corrective Action(s): (Narrative) Please submit photos to the Department that demonstrate that the clarifier is operating as intended with no solids discharging over the weir.</p>
<p>Is the clarifier free from excessive scum, algae and/or trash overflowing the weir? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, the clarifier contained excessive scum that was noted discharging over the weir.</p> <p>Corrective Action(s): (Narrative) Please submit photos to the Department that demonstrate that the clarifier is operating as intended with no solids discharging over the weir.</p>
<p>Are the aeration basins diffusers free from clogs and providing adequate mixing? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that several of the aeration basin diffusers were inoperable. The remaining diffusers were not providing adequate mixing for the aeration basins.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the inoperable diffusers have been replaced and that the aeration basins are receiving adequate mixing.</p>
<p>The RAS line was free from excessive splashing that could cause solids to be discharged outside the tank. [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, the return line and the RAS line were noted to cause excessive splashing.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department explaining how excessive splashing will be prevented at both the return line box, and the RAS line.</p>
<p>Is even distribution of air observed in the aeration basin? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that several of the aeration basin diffusers were inoperable. The remaining diffusers were not providing adequate mixing for the aeration basins.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the inoperable diffusers have been replaced and that the aeration basins are receiving adequate mixing.</p>
<p>Are the air line(s) to the aeration basin(s) free from leaks? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that several of the aeration basin diffusers were severely corroded and inoperable. The remaining diffusers were not providing adequate mixing for the aeration basins.</p> <p>Corrective Action(s): (Narrative)</p>

	Please submit documentation to the Department demonstrating that all the inoperable diffusers have been replaced and that the aeration basins are receiving adequate mixing
Are all the blower motors present and operational at the time of the inspection? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, there was only one operational blower on the north plant, and two operational blowers on the south plant.
	Corrective Action(s): (Narrative) Please repair or replace the inoperable blower motors as necessary and submit documentation demonstrating the blower's functionality to the Department.
Are spare parts and a second standby blower motors stored onsite? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, several blowers were inoperable and had not been repaired.
	Corrective Action(s): (Narrative) Please demonstrate what spare parts will be maintained by the Facility so that repairs can be made immediately for inoperable components in the future.
Were the tank contents in the aerobic digester(s) well mixed? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that only one of the plant's digesters was operational. The operating digester had a significant hole in the tank wall allowing the contents of the digester and the aeration basin to mix. This was preventing the proper operation of the digester.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the hole between the digester and the aeration basin has been repaired, and that all of the Facility's digesters are operational.
Are there two functioning pumps in the surge tank(s)? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the surge tank only had one operational pump.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the inoperable surge tank pump has been repaired, and that the surge tanks are functioning as designed.
Is the Chlorine Contact Chamber (CCC) effluent clear and free from scum, solids accumulation and debris? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the effluent in the CCC was very turbid and brown in color.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the CCC has been cleaned and that the effluent is clear and free from scum and solids accumulation.
Does the chlorine injection point provide optimal mixing to occur in the CCC? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that the Facility has two CCCs that run parallel to each other. The chlorine injection point was only serving one of the two tanks.
	Corrective Action(s): (Narrative) The Facility hired a new operator who began operations on 1/1/2024. The new operator has brought a temporary second chlorine pump to supply chlorine to the second CCC. Please submit documentation to the Department explaining what the Facility will do to permanently remediate this issue and ensure that both CCC tanks are receiving adequate chlorine.
Is the CCC chlorine pump operational, providing adequate chlorine supply for disinfection and at the permitted location? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that the Facility has two CCCs that run parallel to each other. The chlorine injection point was only serving one of the two tanks.
	Corrective Action(s): (Narrative) The Facility hired a new operator who began operations on 1/1/2024. The new operator has brought a temporary second chlorine pump to supply chlorine to the second CCC. Please submit documentation to the Department explaining what the Facility will do to permanently remediate this issue and ensure that both CCC tanks are receiving adequate chlorine.
	Deficiency: (Narrative)

<p>Is the stilling well free from a thick layer of sludge and/or trash? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>At the time of the inspection, it was noted that the stilling well contained a thick layer of sludge with rags visible on the airline. Additionally, there were plants noted growing in the stilling well.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the stilling wells have been cleaned and are free from a thick layer of sludge.</p>
<p>Is the exterior of the tanks, wall, and/or pipes of the facility free from leaks? [62-600.410 F.A.C., 62-620.300 (5) F.A.C., 62-620.610 (7) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, there were several cracks and leaks noted on the tank walls.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the cracks on the tank walls have been repaired.</p>
<p>Is the gate around the lift station and the cover to the lift station locked? [62-604.400 (2)(d) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection the cover to Lift Station #1 was not locked.</p> <p>Corrective Action(s): (Narrative) Please submit photos demonstrating that a lock has been provided for the lift station cover.</p>
<p>Are there two functioning pumps that alternate? [62-604.500 (3) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, Lift Station #1 only had one operational pump.</p> <p>Corrective Action(s): (Narrative) Please submit documentation demonstrating that the inoperable pump has been repaired.</p>
<p>Is the facility free from any Facility Site Review violation not listed above that needs to be addressed? [See Deficiency Narrative for Specific Rule Violated]</p>	<p>Deficiency: (Narrative) At the time of the inspection the following Facility related issues were noted: Rags and other debris were tangled around the remaining functioning diffusers in the aeration basins.</p> <p>The influent line coming from the splitter box and going to the aeration basins was not properly supported. The line was sagging and some joints connecting pipe sections were showing small cracks.</p> <p>The Waste Activated Sludge (WAS) line was not properly located. The north plant wastes into aeration basin #3, and the south plant sends half of the WAS to the digester, but the other half goes back into aeration basin #1. [Rules 62-600.410 and 62-620.300 (5), F.A.C.]</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the rags and debris have been cleaned from the aeration basins.</p> <p>Please indicate how the facility will ensure the influent line is properly supported to reduce the risk of SSOs.</p> <p>Please provide documentation indicating how the Facility will address the WAS line being improperly located.</p>
<p>Observations:</p>	
<p>At the time of the inspection, Department personnel was unable to determine the following:</p> <ul style="list-style-type: none"> • if the bar screen is cleaned on a routine basis due to the bar screen being offline. • if the bar screen is cleaned on a routine basis due to the bar screen being offline. • if the clarifier is free from excessive sand and/or grit accumulation due to the state of the clarifier. 	

Flow Measurement

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
Is there easy access to flow meter?	Yes			
Is the flow meter in the correct location?	Yes			
Is the flow measuring device installed properly?	Yes			
Is the flow meter calibrated at least annually and is it current?	No			
When was the flow meter last calibrated?	Unknown No			
Is the flow measurement device operating within +/- 10% of the actual flow?	N/A			
Is the flow meter operating properly at the time of the inspection?	Yes			
The chart recorder and/or totalizer for the flow meter was operational at the time of the inspection.	Yes			
The elapsed time meters on the lift station pumps were functioning.	Yes			
The flow entering the convergence section of the Parshall Flume was free of excessive turbulence.	N/A			
Is the facility free from any Flow Measurement violation not listed above that needs to be addressed?	Yes			
<ul style="list-style-type: none"> • Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*” • Questions with “No” responses indicate deficiencies • Questions with “N/A” responses do not apply to the facility 				
Deficiencies & Corrective Actions:				
Is the flow meter calibrated at least annually and is it current? [62-600.200 (25) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the Facility did not provide the most recent flow calibration report.			
	Corrective Action(s): (Narrative) Please submit documentation demonstrating that the flow meter has been calibrated within the past 12 months.			
When was the flow meter last calibrated?	Deficiency: (Narrative) At the time of the inspection, the Facility did not provide the most recent flow calibration report. [Rule 62-600, F.A.C.]			
	Corrective Action(s): (Narrative) Please submit documentation demonstrating that the flow meter has been calibrated within the past 12 months.			
Observations:				
No additional observations or deficiencies were noted.				

Operations and Maintenance

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
Does the facility have adequate plant staffing?	Yes			
Is a certified operator operating the wastewater treatment facility with the appropriate license level for the size of the plant?	Yes			

Is the operator performing treatment plant operation and maintenance duties in a responsible and professional manner?	No
Is the plant O&M log maintained in a hard-bound book with consecutive page numbering, or another approved format?	No
Does the facility have an O&M manual, and does the facility's O&M manual reflect the current configuration of the facility?	No
*Is the facility operated in accordance with the O & M Manual? (If there is a high potential for water quality or health impacts meets SNC criteria)	N/A
Is the facility maintaining a log that documents routine equipment maintenance?	Yes
Is the plant free of any treatment components that are in disrepair that would provide for unsafe operation?	Yes
Is the facility without an inflow and infiltration problem which would cause collection system and/or operational issues?	Yes
*Does the facility replace malfunctioning equipment, which can result in a high potential for water supply quality or health impacts?	No
Dike berms appeared to be in satisfactory condition.	Yes
Handrails/catwalks/ladders were in good working order providing for safe conditions.	No
The liner(s) in the containment pond(s) appeared to be functioning as intended.	N/A
The plant operator is fulfilling the minimum site requirements as required by the Permit.	Yes
Preventative maintenance is being performed in the accordance with the manufacturer's recommendations.	No
The facility maintains an adequate spare parts inventory.	No
Swales were being maintained.	N/A
Is the facility free from any Operations and Maintenance violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • <i>Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a "*"</i> • <i>Questions with "No" responses indicate deficiencies</i> • <i>Questions with "N/A" responses do not apply to the facility</i> 	
Deficiencies & Corrective Actions:	
Is the operator performing treatment plant operation and maintenance duties in a responsible and professional manner? [62-602.650 (1) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, there were signs of a previous overflow at the facility which, based on available records, was not reported. Additionally, many of the Facility's treatment components were in disrepair indicating that operation and maintenance has been neglected.
	Corrective Action(s): (Narrative) On January 1, 2024, a new company took over operations of the Facility to work on correcting the items noted in the other sections of the report. No further action required.
Is the plant O&M log maintained in a hard-bound book with consecutive page numbering, or another approved format? [62-602.650 (4) F.A.C.]	Deficiency: (Narrative) The Facility did not have an O&M Manual available onsite.
	Corrective Action(s): (Narrative) Please submit documentation demonstrating that the Facility has developed an O&M Manual and that a copy of it is available at the Facility.
Does the facility have an O&M manual, and does the facility's O&M manual reflect the current configuration of the facility? [62-	Deficiency: (Narrative) The Facility did not have an O&M Manual available onsite.
	Corrective Action(s): (Narrative) Please submit documentation demonstrating that the Facility has developed an O&M Manual and that a copy of it is available at the Facility.

620.350 (6) F.A.C., 62-600.720 (1) F.A.C.]	
*Does the facility replace malfunctioning equipment, which can result in a high potential for water supply quality or health impacts? [62-600.410 (3) F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) Several necessary treatment components were inoperable at the time of the inspection. In particular, several blowers were not functional, and many of the Facility's diffusers were not functional.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the inoperable treatment components have been repaired or replaced.
Handrails/catwalks/ladders were in good working order providing for safe conditions. [62-600.410 (3) F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that one of the sets of stairs at the Facility had a rotted and broken step. Please refer to photo number ## in the photo log.
	Corrective Action(s): (Narrative) Please submit photos to the Department demonstrating that the broken step has been repaired.
Preventative maintenance is being performed in the accordance with the manufacturer's recommendations. [62-600.410 (3) F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) Many of the Facility's treatment components were in disrepair indicating that preventative maintenance was not being conducted.
	Corrective Action(s): (Narrative) Please submit documentation to the Department explaining how the Facility intends to ensure preventative maintenance is conducted appropriately going forward.
The facility maintains an adequate spare parts inventory. [62-600.720 (1)(b) F.A.C.]	Deficiency: (Narrative) Many of the Facility's treatment components were in disrepair indicating that adequate spare parts were not available to conduct the necessary repairs.
	Corrective Action(s): (Narrative) Please submit documentation to the Department explaining how the Facility intends to ensure adequate spare parts are available going forward.
Observations:	
No additional observations or deficiencies were noted.	

Effluent Quality

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
DMR review period:	1/1/2021 – 12/31/2023 Yes			
A review of the Discharge Monitoring Reports revealed the following effluent exceedance(s).	Please refer to Table E in the Appendix for additional details. No			
*Did the effluent limits exceed the Technical Review Criteria less than two times in six months?	N/A			
*Are the effluent limits without exceedances four out of six months (chronic criteria)?	Yes			

*Did the total residual chlorine levels meet disinfection limits? (If below required minimum 10% or more of the time in a rolling 6-month period, meets SNC criteria)	Yes
Was the facility free of a discharge of wastewater that resulted in a fish kill?	Yes
*Is persistent acute toxicity documented through follow-up tests?	N/A
*Is persistent chronic toxicity documented through follow-up tests?	N/A
*Is persistent acute or chronic toxicity documented in the effluent through the use of routine and follow-up tests?	N/A
Does the facility meet the permit or enforcement narrative effluent limitation(s)? (Non-DMR visible sheen defined as iridescence present so as to cause taste or odor, or otherwise interfere with the beneficial use of the receiving water)	N/A
Is the effluent free from excessive (suspended solids, foam, grease, scum) in the discharge stream?	Yes
*Was the facility free from any other violation with a high potential for water quality or health impacts?	Yes
Is the facility free from any Effluent Quality violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*” • Questions with “No” responses indicate deficiencies • Questions with “N/A” responses do not apply to the facility 	
Deficiencies & Corrective Actions:	
A review of the Discharge Monitoring Reports revealed the following effluent exceedance(s).	Deficiency: (Narrative) A review of the DMR revealed effluent exceedances. Please refer to Table G in the Appendix for additional details. [Rule 62-600 and 62-610, F.A.C.] Corrective Action(s): (Narrative) Please submit documentation to the department indicating how the Facility will ensure compliance with the permitted effluent limitations going forward.
Observations:	
At the time of the inspection the Total Residual Chlorine levels, as read with the Facility’s chlorine meter, were: <ol style="list-style-type: none"> 1. 3.6 mg/L (CCC Tank 1) 2. >8.8 mg/L (CCC Tank 2) 	

Effluent Disposal

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
Are discharge location(s) as per permit?	Yes			
What type of reuse is the facility approved for?	Part 4 Rapid Infiltration Basins Yes			
Has a cross connection control program been implemented within the areas where reclaimed water is provided for use (Part III, VII)?	N/A			
Is all reclaimed water piping and equipment color-coded Pantone purple (522C)?	N/A			
Hose bibbs met access restrictions and other requirements.	N/A			
Reclaimed water valves and outlets were appropriately tagged and /or labeled.	N/A			
Are advisory signs posted in English and Spanish in areas where non-potable Public Access Reuse water is being applied (Part III, VII)?	N/A			
Is the reclaimed water retained on the application site?	N/A			

No significant ponding was observed on the reclaimed water application site.	N/A
There was no aerosol mist leaving the boundaries of the land application?	N/A
There was no evidence of solids loss in the treatment process or from the plant?	Yes
The RIBs and/or percolation ponds were free from excessive vegetation and sludge?	Yes
The percolation ponds were free from accumulated sludge.	Yes
Does the percolation ponds have at least 3 ft of freeboard?	Yes
The absorption field was free from excessive vegetation.	N/A
Do the reclaimed water storage ponds have adequate freeboard?	N/A
Are RIBs well maintained and free from excessive vegetation?	Yes
There was no evidence of a bypass or failure at the effluent storage and/or disposal site(s)?	Yes
Are all effluent disposal areas such as RIBs, ponds, and sprayfields being loaded and rested per permit conditions?	Yes
The disposal pond berms were free from excessive growth or vegetation.	Yes
There was no evidence of a bypass or failure from the storage ponds observed during the inspection.	Yes
No unauthorized discharge to waters of the state was observed during the inspection.	Yes
Are the sprinklers functioning as intended for the absorption field(s) or sprayfield(s)?	N/A
The facility is meeting the minimum setback distances.	Yes
Does the facility maintain a supply of spare parts for the absorption field(s) or sprayfield(s)?	N/A
The effluent disposal and/or storage area was free from sinkholes.	Yes
Are the sprayfields free from grazing dairy cattle?	N/A
The sprayfield was free from ponding.	N/A
The sprayfield was free from excessive vegetation.	N/A
Edible food crops were being properly irrigated with reclaimed water.	N/A
What cover crop and/or vegetation is planted on the reclaimed water area(s)?	N/A N/A
*The disposal system was being operated as designed with a low potential for water quality or health impacts.	Yes
*There was no unauthorized operation or modification of the disposal system.	Yes
Fencing around the effluent disposal site for access control was complete and in good repair.	No
There were no dead animals observed in the discharge stream.	Yes
Is the facility free from any Effluent Disposal violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*” • Questions with “No” responses indicate deficiencies • Questions with “N/A” responses do not apply to the facility 	
Deficiencies & Corrective Actions:	
Fencing around the effluent disposal site for access control was complete and in good repair. [62-610.518 (10) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that one of the gates in the fence surrounding the Facility’s disposal site was damaged.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the damaged gate has been repaired.
Observations:	
No additional observations or deficiencies were noted.	

Biosolids

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
Does the facility's method of biosolids use or disposal match what is allowed in the facility permit (i.e., landfill, land application, distribution and marketing, transfer to another facility, biofuel/bioenergy)?	Yes			
Does the permittee keep records of biosolids quantities for five years, as applicable (quantities generated, received from source facilities, treated, distributed and marketed, land applied, used as a biofuel or for bioenergy, transferred to another facility, or landfilled)?	No			
Are biosolids quantities reported on the facility RMP-Q DMR?	Yes			
Are the biosolids quantities reported on the RMP - Q DMRs correct and accurate?	N/A			
The facility's treatment, management, transportation, use, land application, or disposal of biosolids does not result in objectionable odors, i.e., does not result in a violation of the odor prohibition in subsection 62-296.320 (2).	N/A			
If there is an objectionable odor, please describe the odors characteristics, frequency, duration, and migration, etc.	N/A N/A			
Is the storage of biosolids or other solids at this facility in accordance with the Facility Biosolids Storage Plan?	N/A			
Does the treatment facility ensure no biosolids are spilled from or tracked off the treatment facility property by the hauling vehicle?	N/A			
The biosolids for this facility are classified as _____: (AA, A, and/or B)	N/A N/A			
Does the class of biosolids produced for beneficial use match the authorized class in the facility permit (Class AA, A, or B)?	N/A			
Does the facility use the biosolids pathogen reduction alternative option identified in the permit?	N/A			
Are all the operational and process parameters monitored to demonstrate compliance for pathogen reduction?	N/A			
Do the biosolids meet the treatment requirements for pathogen reduction option used?	N/A			
Does the facility use the biosolids vector attraction reduction option identified in the permit?	N/A			
Are all the operational and process parameters monitored to demonstrate compliance for vector attraction reduction?	N/A			
Do the biosolids satisfactorily meet the treatment requirements for vector attraction reduction?	N/A			
If the Specific Oxygen Uptake Rate (SOUR) test is used for vector attraction reduction, is it conducted within 15 minutes of sample collection by a certified laboratory or under the direction of an operator certified in accordance with Chapter 62-602, F.A.C?	N/A			
Does treatment of biosolids or septage for the purpose of meeting pathogen reduction or vector attraction reduction requirements take place at the permitted facility (e.g., not in the tank of a hauling vehicle)?	N/A			
Are the biosolids monitored at the frequency required by the permit?	N/A			
Are the biosolids monitoring results reported on the facility DMR (RMP-AA, RMP-A, or RMP-B)?	N/A			
Are the biosolids monitored for all the required parameters for the class of biosolids?	N/A			
Do the Class AA, A, or B biosolids comply with the ceiling pollutant limits?	N/A			
Are the correct analysis methods used for biosolids?	N/A			
Is a certified laboratory used for the analysis of the biosolids?	N/A			
Are all biosolids samples representative and taken after final treatment of the biosolids but before land application or distribution and marketing, unless otherwise approved?	N/A			

Are all biosolids samples taken at the location specified in the facility permit?	N/A
Are the correct sample types properly taken for the type of biosolids (POTW Sludge Sampling Manual)?	N/A
Are the Class AA biosolids monitored monthly?	N/A
Do the Class AA biosolids meet the Class AA parameter limits?	N/A
Are Class AA biosolids that are stored for more than 45 days re-sampled for fecal coliform or Salmonella sp. at the frequency specified in the permit, if required?	N/A
For distribution and marketing, does the facility have a fertilizer license, sell or given-away to someone with a fertilizer license, or is enrolled in the US Composting Council's Seal to Testing Assurance program (USCC STA program does not apply in the Lake Okeechobee, St. Lucie River, and Caloosahatchee River watersheds)?	N/A
If the facility discovered that distributed and marketed biosolids did not meet Class AA standards, did the facility notify, within 24 hours, the Department and all persons to whom they delivered or distributed and marketed the Class AA biosolids?	N/A
Does the facility make available to users by product labels or other means the following information - fertilizer label or equivalent information; name and address of the facility; statement that the biosolids meet subsection 62-640.700 (5), F.A.C.; recommend application rates; and recommendations for storage (including the more than one dry ton/seven-day provision)?	N/A
Are all the sites where biosolids are land applied listed on the Treatment Facility Biosolids Plan form (DEP Form 62-640.219 (2)(a))?	N/A
If a permitted site not listed in the Treatment Facility Biosolids Plan was used, did the permittee notify DEP at least 24 hours prior to land application at the site and submit a revised form within 30 days after using the site?	N/A
Did the facility only used permitted sites - i.e., no unpermitted sites were used for land application (i.e., the site did not have a valid DEP permit)?	N/A
Does the permittee maintain hauling records for shipments to land application sites and do they contain the required information?	N/A
Does the permittee provide a copy of the hauling records to the biosolids site manager, were records free of any discrepancies regarding the quantities delivered, and any discrepancies were reported to DEP within 24 hours of discovery?	N/A
Did all biosolids sent to sites meet pathogen reduction, vector attraction reduction, and pollutant limits?	N/A
If biosolids not meeting standards were sent to a site, did the permittee notify DEP, the site manager, the site permittee within 24 hours of discovery?	N/A
Does the permittee maintain copies for each site used of the Biosolids Application Site Annual Summary forms received from the site permittees indefinitely?	N/A
Has the permittee submitted Treatment Facility Biosolids Annual Summary reports to DEP by February 19 each year?	N/A
Was the information in the Treatment Facility Biosolids Annual Summary accurate?	N/A
Is any incineration or use of biosolids as a biofuel or for bioenergy in accordance with DEP's air regulations and RCRA?	N/A
Does the permittee keep the required hauling records to track transport of biosolids between facilities?	N/A
If the facility receives biosolids from a source facility, did the permittee report any discrepancies in the quantities of biosolids to DEP within 24 hours of discovery?	N/A
If the facility is a source facility and sends biosolids to another facility, does the permittee provide a copy of their hauling records for each shipment to the receiving facility?	N/A
If the facility receives biosolids from a source facility, does the receiving facility permit allow receipt of biosolids from other facilities?	N/A

Does the facility have copies of the required written agreement(s) between the receiving and source facility?	N/A
Did the permittee (source or receiving facility) submit all new written agreements to DEP within 30 days before transporting biosolids (unless approval given otherwise)?	N/A
Is operator staffing requirements met?	N/A
Are the biosolids receiving and handling operations satisfactory?	N/A
Are grit and screenings, etc., from the headworks properly disposed of in a landfill?	N/A
Is the facility free from any Biosolids violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a "*" • Questions with "No" responses indicate deficiencies • Questions with "N/A" responses do not apply to the facility 	
Deficiencies & Corrective Actions:	
Does the permittee keep records of biosolids quantities for five years, as applicable (quantities generated, received from source facilities, treated, distributed and marketed, land applied, used as a biofuel or for bioenergy, transferred to another facility, or landfilled? [62-640.650 (4)(a) F.A.C.]	<p>Deficiency: (Narrative) At the time of the inspection, the latest sludge hauling receipts were not provided.</p> <p>Corrective Action(s): (Narrative) Going forward, please ensure that records are kept and available for five years.</p>
Observations:	
<p>The latest sludge hauling receipt was not provided; however, per the Facility's DMRs, the Facility most recently hauled 1000 dry tons of biosolids in November 2023. The biosolids quantities reported on the RMP - Q DMRs could not verify due to missing records.</p> <p>Biosolids generated by this facility may be transferred to Karle Enviro-Organic Recycling, Inc. or disposed of in a Class I solid waste landfill.</p>	

Groundwater

Compliance Rating	Out of Compliance			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
DMRs review period	1/1/2023 – 12/31/2023 Yes			
Are the groundwater monitoring results sent to the Department on Discharge Monitoring Report, Form 62-620.910 (10), F.A.C. and submitted by the DMR due date?	No			
After a review of the Discharge Monitoring Reports, are the compliance well parameters meeting the groundwater standards in the time period reviewed (12 months or greater)?	No			
A review of the Discharge Monitoring Reports revealed the following effluent exceedance(s).	Please refer to Table F in the Appendix			

	for additional details. No
Do the facilities purging logs on DEP Form FD 9000-24 indicate that purging was done properly; including sufficient volume, purge rate, depth to water, and stability criteria (pH, Temperature, Conductivity, Dissolved Oxygen, Turbidity)?	N/A
Is the groundwater monitoring report complete and accurate, including analysis method, laboratory method detection limits, static water level, purging logs, sample collection procedures and treatment?	Yes
Do the groundwater monitoring wells meet DEP requirements including tamper-proof locks, unique well label(s), concrete well pad with protective bumpers not containing numerous cracks, and is free of clutter for sampling purposes?	No
If or when new well construction was completed did the facility plug and properly abandoned the existing well and submit Monitoring well completion Report, Form 62-520.900 (3) to DEP within 60 days?	N/A
If a monitoring well became damaged or inoperable was maintenance conducted and notification sent to DEP within 2 days of discovery?	N/A
Is the well(s) that the facility is sampling at part of the approved groundwater monitoring plan?	Yes
Are the monitoring wells operable to the extent that sampling is possible?	Yes
Are groundwater samples being collected and analyzed as required by the permit or enforcement action; including location, well type, sample type (grab/composite), time, and frequency?	No
If sampling was observed were the sample collection activities being performed in accordance with DEP SOP FS 2200?	N/A
If sampling was observed was equipment in satisfactory condition?	N/A
If sampling was not observed is the description of sample collection activities being performed in accordance with DEP SOP FS 2200?	N/A
Is the facility free from any Groundwater violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • <i>Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*”</i> • <i>Questions with “No” responses indicate deficiencies</i> • <i>Questions with “N/A” responses do not apply to the facility</i> 	
Deficiencies & Corrective Actions:	
Are the groundwater monitoring results sent to the Department on Discharge Monitoring Report, Form 62-620.910 (10), F.A.C. and submitted by the DMR due date? [403.161(1)(b) F.S., 62-600.680 F.A.C.]	Deficiency: (Narrative) A review of the DMRs revealed missing and late submissions. Please refer to Table F in the appendix for additional details.
	Corrective Action(s): (Narrative) Please submit the noted missing DMRs and ensure that all DMRs are submitted by the permit required due dates going forward.
After a review of the Discharge Monitoring Reports, are the compliance well parameters meeting the groundwater standards in the time period reviewed (12	Deficiency: (Narrative) A review of the groundwater DMRs revealed exceedances. Please refer to Table H in the appendix for additional details.
	Corrective Action(s): (Narrative) Please submit documentation to the Department indicating how the Facility will address the groundwater exceedances and prevent them going forward.

months or greater)? [62-520.420 F.A.C.]	
Do the groundwater monitoring wells meet DEP requirements including tamper-proof locks, unique well label(s), concrete well pad with protective bumpers not containing numerous cracks, and is free of clutter for sampling purposes? [62-520.600 (6)(e) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the groundwater wells did not meet DEP requirements. Please refer to Table E in the Appendix for additional details.
	Corrective Action(s): (Narrative) Please submit photos to the Department demonstrating that the noted groundwater monitoring well deficiencies have been corrected.
Are groundwater samples being collected and analyzed as required by the permit or enforcement action, including location, well type, sample type (grab/composite), time, and frequency? [62-600.670 (1) F.A.C., 62-610.412 (2)(a) F.A.C.]	Deficiency: (Narrative) A review of the DMRs revealed missing and late submissions. Please refer to Table F in the appendix for additional details.
	Corrective Action(s): (Narrative) Please submit the noted missing DMRs and ensure that all DMRs are submitted by the permit required due dates going forward.
Observations:	
The sample collection activities being performed in accordance with DEP SOP FS 2200 were not verified due to no purging logs or COCs at the site.	

SSO Survey

Compliance Rating	Significant Out of Compliance			
Does this section apply to the facility?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
Does the facility have an Operation and Maintenance Manual for their collection system?	No			
How often is the Operation and Maintenance Manual updated?	Unknown N/A			
Does the O&M manual reflect the current collection system configuration?	N/A			
Are procedures available for minimizing spills in either the Operation and Maintenance Manual or in a separate document?	N/A			
Does the facility have a Sewer Overflow Response Plan/procedures for minimizing spills?	No			
Did the facility collect and/or analyze bacteriological samples as outlined in their SORP?	N/A			
Does the facility have a map of its collection system?	No			
Are the SORP and collection system maps immediately available to SSO response staff, including during power failures?	N/A			
Did the facility collect and/or analyze bacteriological samples for sewage spills that reached surface waters?	N/A			

Does the facility perform routine preventative maintenance to keep the collection/transmission system in good working order?	No
Does the facility maintain a ready-to-use supply of equipment, tools and materials for responding to SSOs?	No
How many lift stations have permanent emergency back-up power generators?	N/A N/A
In the last 12 months, was the facility free from sewage spills or abnormal event from any part of a collection/transmission system or treatment plant that discharged to the ground or did not make it to surface waters, i.e., stormwater collection system, drainage ditch, stream, pond, or lake?	No
Does the facility report the spill(s) to the Department within 24 hours of discovery?	No
Does the facility follow up on spills?	No
Does the facility keep routine documentation and reporting records of spills, and/or operation and maintenance activities on the collection/transmission system(s)?	No
In the last 12 months, was the facility free from sewage spills or abnormal events from any components of a collection/transmission system or from a treatment plant that reached surface waters including stormwater conveyance system or drainage ditch?	Yes
Is the facility free from any SSO violation not listed above that needs to be addressed?	Yes
<ul style="list-style-type: none"> • <i>Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*”</i> • <i>Questions with “No” responses indicate deficiencies</i> • <i>Questions with “N/A” responses do not apply to the facility</i> 	
Deficiencies & Corrective Actions:	
Does the facility have an Operation and Maintenance Manual for their collection system? [62-604.500 (4) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the Facility did not have a Collections System O&M Manual or map.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the Facility has implemented a Collections System O&M Manual.
Does the facility have a Sewer Overflow Response Plan/procedures for minimizing spills? [62-604.500 (4)(b) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the Facility did not have a Sewer Overflow Response Plan (SORP)/Emergency Response Plan.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the Facility has implemented a SORP/Emergency Response Plan.
Does the facility have a map of its collection system? [62-604.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the Facility did not have a Collections System O&M Manual or map.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the Facility has implemented a Collections System O&M Manual.
The facility failed to perform routine preventative maintenance to keep the collection /transmission system in good working order. [62-604.500 (2) F.A.C., 62-604.500 (3) F.A.C., SSO5]	Deficiency: (Narrative) At the time of the inspection, it was noted that Lift Station #1 only had one operable pump.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the inoperable pump in Lift Station #1 has been repaired.

<p>Does the facility maintain a ready-to-use supply of equipment, tools and materials for responding to SSOs? [62-604.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating how the Facility will be prepared to respond to SSOs going forward.</p>
<p>A sewage spill from any part of a collection/transmission system or treatment plant that did not make it to surface waters, i.e., stormwater collection system, drainage ditch, stream, pond, or lake. [62-604.130 (1) F.A.C., SSO6]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p> <p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
<p>The facility failed to report a sewage spill within 24 hours of discovery. [62-604.550 (2) F.A.C., SSO4]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p> <p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
<p>Does the facility follow up on spills? [62-604.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p> <p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
<p>The facility failed to keep routine documentation and reporting records of spills, and/or operation and maintenance activities on the collection/transmission system. [62-604.300 (5) F.A.C., SSO2]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p> <p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
<p>Observations:</p>	
<p>No additional observations or deficiencies were noted.</p>	

Other

Compliance Rating	Not Evaluated			
Does this section apply to the facility?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Questions				
*Is the facility free from any violation not listed above, or pattern of noncompliance, resulting in a high potential for water quality or health impacts <i>(Any violations considered significant by the Secretary, Deputy Secretary, Director of District Management, or the Division Director meet SNC criteria)</i>	N/A			
Please describe any potential non-wastewater violations (i.e. Hazardous Waste, Stormwater, SLERP, Air and Storage Tanks) that were referred.	N/A N/A			
<ul style="list-style-type: none"> • <i>Significant Non-Compliance Criteria per Program Guidance Memo OWM-00-01 Should be Reviewed when Checklist Items Deficiencies are Noted and Marked by a “*”</i> • <i>Questions with “No” responses indicate deficiencies</i> • <i>Questions with “N/A” responses do not apply to the facility</i> 				
Observations:				
Not Evaluated.				

Deficiencies Summary

Evaluation Area: Permit	
<p>Wastewater was diverted from a portion of the treatment process without department approval. [62-620.300 (2) F.A.C., UBNY]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that the plant headworks (the bar screen and the surge tanks) were offline and wastewater had been diverted to the flow splitter box.</p>
	<p>Corrective Action(s): (Narrative) Please divert wastewater back to the permit approved process flow and submit documentation to the Department demonstrating this has been completed. If the headworks remain inoperable, a permit modification may be necessary.</p>
Evaluation Area: Sampling	
<p>Are meters calibrated and sample analysis conducted at the facility done in accordance with DEP SOP and NELAC guidelines? (Calibration frequency and sample bracketing for pH, Total Residual Chlorine (TRC), Turbidity, DO) [62-160.210 (1) F.A.C., 62-160.800 (1)(a) F.A.C., DEP SOP FT 1000]</p>	<p>Deficiency: (Narrative) A review of the calibration/verification log revealed that the log did not include acceptance criteria for the pH buffers that are used.</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the calibration/verification log has been updated to include acceptance criteria for all buffers or standards used.</p>
<p>The facility failed to collect and/or analyze samples as required by permit or enforcement action. [62-600.650 (1) F.A.C., 62-620.610 (18) F.A.C., 62-160.210 (1) F.A.C., 62-600.660 (1) F.A.C., DEP SOP FS 2400, ANCV]</p>	<p>Deficiency: (Narrative) The Facility failed to collect bi-weekly samples at the required frequency. Additionally, the facility is not collecting composite samples for CBOD (influent and effluent), and TSS (influent and effluent)</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation to the Department detailing how the Facility will ensure that sampling is conducted according to the permit requirements.</p>
<p>Is composite sampling being conducted appropriately; including purging, sampling velocity at least 2fps, clean tubing, individual sample volume of at least 100 mL, sample storage of =6°C preservation, hold times and</p>	<p>Deficiency: (Narrative) The Facility is not collecting composite samples as required by the permit for CBOD (influent and effluent), and TSS (influent and effluent).</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation to the Department detailing how the Facility will ensure that sampling is conducted according to the permit requirements.</p>

representative samples? [62-160.210 (1) F.A.C., 62-160.800 (1)(a) F.A.C., DEP SOP FS 2400, 62-160.300 F.A.C., 40 C.F.R. 136 Table II]	
Did the facility have their Chain of Custody records? [62-160.210 (1) F.A.C.]	<p>Deficiency: (Narrative) The Facility failed to provide their Chain of Custody records.</p> <p>Corrective Action(s): (Narrative) Please submit the Facility's Chain of Custody records for the months of December 2023 and October 2023 to the Department for review.</p>

Evaluation Area: Records and Reports	
Was copy of the current O&M manual available at the time of the inspection? [62-600.720 F.A.C., 62-620.350 F.A.C.]	<p>Deficiency: (Narrative) The Facility did not have a copy of the current O&M Manual onsite.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the Facility has created an O&M Manual and that it is available at the Facility.</p>
Are all required documents and reports available at the plant well organized and complete? [62-4.160 F.A.C., 62-160.240 F.A.C., 62-160.340 F.A.C., 62-620.350 F.A.C.]	<p>Deficiency: (Narrative) At the time of the inspection, the following documents were not available:</p> <ul style="list-style-type: none"> • The Facility O&M Manual. • The most recent sludge hauling receipts. • The Collections System O&M Manual. • The Facility's Sanitary Sewer Overflow Response Plan. • Copies of the Facility's Chains of Custody for both effluent sampling and groundwater sampling. • Lab report. <p>Corrective Action(s): (Narrative) Please ensure that the noted missing documents have been made available at the Facility and submit copies to the Department for review.</p>
The facility failed to maintain records for the required retention period. [62-620.350 (2) F.A.C., FMRR]	<p>Deficiency: (Narrative) At the time of the inspection, the following documents were not available:</p> <ul style="list-style-type: none"> • The Facility O&M Manual. • The most recent sludge hauling receipts. • The Collections System O&M Manual. • The Facility's Sanitary Sewer Overflow Response Plan. • Copies of the Facility's Chains of Custody for both effluent sampling and groundwater sampling. • Lab report. <p>Corrective Action(s): (Narrative) Please ensure that the noted missing documents have been made available at the Facility and submit copies to the Department for review.</p>
Are the discharge monitoring reports completed properly? [403.161(1)(b) F.S., 62-600.680 F.A.C.]	<p>Deficiency: (Narrative) A review of the DMRs revealed deficiencies. Please refer to Table D in the Appendix for additional details.</p> <p>Corrective Action(s): (Narrative) Please correct and resubmit the noted calculation and transcription errors.</p>
	Deficiency: (Narrative)

<p>Has the permittee submitted an annual Reclaimed Water and/or Effluent Analysis Report? [403.161(1)(b) F.S., 62-600.680 F.A.C.]</p>	<p>A records review revealed the Facility has not submitted the annual Reclaimed Water/ or Effluent Analysis Report for 2022 or 2023.</p>
	<p>Corrective Action(s): (Narrative) Please submit the missing reports as soon as possible and ensure that all reports required by the permit are submitted by the permit required due date going forward.</p>
<p>The facility failed to submit any report required by rule, permit, enforcement action or inspection activity except for DMRs. [62-610.870 (3) F.A.C., 62-610.865 (11) F.A.C., 62-600.405 F.A.C., 403.161(1)(b) F.S., FRPT]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p>
	<p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
<p>The permittee failed to submit any DMR required by rule, permit, or enforcement action in a timely manner. [403.161(1)(b) F.S., 62-600.680 F.A.C., 62-620.610 (18)(a) F.A.C., FDMR]</p>	<p>Deficiency: (Narrative) A review of the DMRs revealed missing and late DMRs. Please refer to Table F in the Appendix for additional details.</p>
	<p>Corrective Action(s): (Narrative) Please submit all noted missing DMRs and ensure that all reports are submitted by the permit required due date in the future.</p>
<p>The permittee failed to notify the department of any event or activity that requires notification as required by permit or rule. [403.161(1)(b) F.S., 62-4.130 F.A.C., RSWP]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p>
	<p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>

Evaluation Area: Facility Site Review

<p>The headworks was free from excessive corrosion. [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that the diffusers in the Facility's surge tanks were severely corroded and inoperable.</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the diffusers for the surge tank have been replaced.</p>
<p>The headwork is free from evidence of recent overflows. [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p>
	<p>Corrective Action(s): (Narrative)</p>

	Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.
Is the mechanical bar screen functioning as intended? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that the bar screen at the headworks was not operational, and flow had been diverted around it.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the necessary repairs have been made to bring the bar screen back online.
Are screenings and grit being collected from the headworks in suitable containers? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the container for collecting screenings and grit at the headworks was severely corroded and, as a result, had several holes that would allow leachate to drain to the ground if it were in use.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that a new container for collecting screenings and grit has been provided.
The leachate from the screening dumpster(s) is piped to the headworks and not onto the ground. [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the container for collecting screenings and grit at the headworks was severely corroded and, as a result, had several holes that would allow leachate to drain to the ground if it were in use.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that a new container for collecting screenings and grit has been provided.
Is the clarifier free from solids discharging over the weir(s)? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that the clarifier was not achieving proper settling, and solids were noted discharging over the weir.
	Corrective Action(s): (Narrative) Please submit photos to the Department that demonstrate that the clarifier is operating as intended with no solids discharging over the weir.
Is the clarifier free from excessive scum, algae and/or trash overflowing the weir? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the clarifier contained excessive scum that was noted discharging over the weir.
	Corrective Action(s): (Narrative) Please submit photos to the Department that demonstrate that the clarifier is operating as intended with no solids discharging over the weir.
Are the aeration basins diffusers free from clogs and providing adequate mixing? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that several of the aeration basin diffusers were inoperable. The remaining diffusers were not providing adequate mixing for the aeration basins.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the inoperable diffusers have been replaced and that the aeration basins are receiving adequate mixing.
The RAS line was free from excessive splashing that could cause solids to be discharged outside the tank. [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the return line and the RAS line were noted to cause excessive splashing.
	Corrective Action(s): (Narrative) Please submit documentation to the Department explaining how excessive splashing will be prevented at both the return line box, and the RAS line.
	Deficiency: (Narrative)

<p>Is even distribution of air observed in the aeration basin? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>At the time of the inspection, it was noted that several of the aeration basin diffusers were inoperable. The remaining diffusers were not providing adequate mixing for the aeration basins.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the inoperable diffusers have been replaced and that the aeration basins are receiving adequate mixing.</p>
<p>Are the air line(s) to the aeration basin(s) free from leaks? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that several of the aeration basin diffusers were severely corroded and inoperable. The remaining diffusers were not providing adequate mixing for the aeration basins.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the inoperable diffusers have been replaced and that the aeration basins are receiving adequate mixing</p>
<p>Are all the blower motors present and operational at the time of the inspection? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, there was only one operational blower on the north plant, and two operational blowers on the south plant.</p> <p>Corrective Action(s): (Narrative) Please repair or replace the inoperable blower motors as necessary and submit documentation demonstrating the blower's functionality to the Department.</p>
<p>Are spare parts and a second standby blower motors stored onsite? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, several blowers were inoperable and had not been repaired.</p> <p>Corrective Action(s): (Narrative) Please demonstrate what spare parts will be maintained by the Facility so that repairs can be made immediately for inoperable components in the future.</p>
<p>Were the tank contents in the aerobic digester(s) well mixed? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that only one of the plant's digesters was operational. The operating digester had a significant hole in the tank wall allowing the contents of the digester and the aeration basin to mix. This was preventing the proper operation of the digester.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the hole between the digester and the aeration basin has been repaired, and that all of the Facility's digesters are operational.</p>
<p>Are there two functioning pumps in the surge tank(s)? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, the surge tank only had one operational pump.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the inoperable surge tank pump has been repaired, and that the surge tanks are functioning as designed.</p>
<p>Is the Chlorine Contact Chamber (CCC) effluent clear and free from scum, solids accumulation and debris? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, the effluent in the CCC was very turbid and brown in color.</p> <p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the CCC has been cleaned and that the effluent is clear and free from scum and solids accumulation.</p>
<p>Does the chlorine injection point provide optimal mixing to occur in the CCC? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that the Facility has two CCCs that run parallel to each other. The chlorine injection point was only serving one of the two tanks.</p> <p>Corrective Action(s): (Narrative) The Facility hired a new operator who began operations on 1/1/2024. The new operator has brought a temporary second chlorine pump to supply chlorine to the second CCC. Please</p>

	submit documentation to the Department explaining what the Facility will do to permanently remediate this issue and ensure that both CCC tanks are receiving adequate chlorine.
Is the CCC chlorine pump operational, providing adequate chlorine supply for disinfection and at the permitted location? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that the Facility has two CCCs that run parallel to each other. The chlorine injection point was only serving one of the two tanks.
	Corrective Action(s): (Narrative) The Facility hired a new operator who began operations on 1/1/2024. The new operator has brought a temporary second chlorine pump to supply chlorine to the second CCC. Please submit documentation to the Department explaining what the Facility will do to permanently remediate this issue and ensure that both CCC tanks are receiving adequate chlorine.
Is the stilling well free from a thick layer of sludge and/or trash? [62-600.410 F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that the stilling well contained a thick layer of sludge with rags visible on the airline. Additionally, there were plants noted growing in the stilling well.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the stilling wells have been cleaned and are free from a thick layer of sludge.
Is the exterior of the tanks, wall, and/or pipes of the facility free from leaks? [62-600.410 F.A.C., 62-620.300 (5) F.A.C., 62-620.610 (7) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, there were several cracks and leaks noted on the tank walls.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the cracks on the tank walls have been repaired.
Is the gate around the lift station and the cover to the lift station locked? [62-604.400 (2)(d) F.A.C.]	Deficiency: (Narrative) At the time of the inspection the cover to Lift Station #1 was not locked.
	Corrective Action(s): (Narrative) Please submit photos demonstrating that a lock has been provided for the lift station cover.
Are there two functioning pumps that alternate? [62-604.500 (3) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, Lift Station #1 only had one operational pump.
	Corrective Action(s): (Narrative) Please submit documentation demonstrating that the inoperable pump has been repaired.
Is the facility free from any Facility Site Review violation not listed above that needs to be addressed? [See Deficiency Narrative for Specific Rule Violated]	Deficiency: (Narrative) At the time of the inspection the following Facility related issues were noted: Rags and other debris were tangled around the remaining functioning diffusers in the aeration basins.
	The influent line coming from the splitter box and going to the aeration basins was not properly supported. The line was sagging and some joints connecting pipe sections were showing small cracks.
	The Waste Activated Sludge (WAS) line was not properly located. The north plant wastes into aeration basin #3, and the south plant sends half of the WAS to the digester, but the other half goes back into aeration basin #1. [Rules 62-600.410 and 62-620.300 (5), F.A.C.]
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the rags and debris have been cleaned from the aeration basins.

	<p>Please indicate how the facility will ensure the influent line is properly supported to reduce the risk of SSOs.</p> <p>Please provide documentation indicating how the Facility will address the WAS line being improperly located.</p>
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Evaluation Area: Flow Measurement

<p>Is the flow meter calibrated at least annually and is it current? [62-600.200 (25) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, the Facility did not provide the most recent flow calibration report.</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation demonstrating that the flow meter has been calibrated within the past 12 months.</p>
<p>When was the flow meter last calibrated?</p>	<p>Deficiency: (Narrative) At the time of the inspection, the Facility did not provide the most recent flow calibration report. [Rule 62-600, F.A.C.]</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation demonstrating that the flow meter has been calibrated within the past 12 months.</p>

Evaluation Area: Operations and Maintenance

<p>Is the operator performing treatment plant operation and maintenance duties in a responsible and professional manner? [62-602.650 (1) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, there were signs of a previous overflow at the facility which, based on available records, was not reported. Additionally, many of the Facility's treatment components were in disrepair indicating that operation and maintenance has been neglected.</p>
	<p>Corrective Action(s): (Narrative) On January 1, 2024, a new company took over operations of the Facility to work on correcting the items noted in the other sections of the report. No further action required.</p>
<p>Is the plant O&M log maintained in a hard-bound book with consecutive page numbering, or another approved format? [62-602.650 (4) F.A.C.]</p>	<p>Deficiency: (Narrative) The Facility did not have an O&M Manual available onsite.</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation demonstrating that the Facility has developed an O&M Manual and that a copy of it is available at the Facility.</p>
<p>Does the facility have an O&M manual, and does the facility's O&M manual reflect the current configuration of the facility? [62-620.350 (6) F.A.C., 62-600.720 (1) F.A.C.]</p>	<p>Deficiency: (Narrative) The Facility did not have an O&M Manual available onsite.</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation demonstrating that the Facility has developed an O&M Manual and that a copy of it is available at the Facility.</p>
<p>*Does the facility replace malfunctioning equipment, which can result in a high potential for water supply quality or health impacts?</p>	<p>Deficiency: (Narrative) Several necessary treatment components were inoperable at the time of the inspection. In particular, several blowers were not functional, and many of the Facility's diffusers were not functional.</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that all the inoperable treatment components have been repaired or replaced.</p>

[62-600.410 (3) F.A.C., 62-620.300 (5) F.A.C.]	
Handrails/catwalks/ladders were in good working order providing for safe conditions. [62-600.410 (3) F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that one of the sets of stairs at the Facility had a rotted and broken step. Please refer to photo number ## in the photo log.
	Corrective Action(s): (Narrative) Please submit photos to the Department demonstrating that the broken step has been repaired.
Preventative maintenance is being performed in the accordance with the manufacturer's recommendations. [62-600.410 (3) F.A.C., 62-620.300 (5) F.A.C.]	Deficiency: (Narrative) Many of the Facility's treatment components were in disrepair indicating that preventative maintenance was not being conducted.
	Corrective Action(s): (Narrative) Please submit documentation to the Department explaining how the Facility intends to ensure preventative maintenance is conducted appropriately going forward.
The facility maintains an adequate spare parts inventory. [62-600.720 (1)(b) F.A.C.]	Deficiency: (Narrative) Many of the Facility's treatment components were in disrepair indicating that adequate spare parts were not available to conduct the necessary repairs.
	Corrective Action(s): (Narrative) Please submit documentation to the Department explaining how the Facility intends to ensure adequate spare parts are available going forward.

Evaluation Area: Effluent Quality

A review of the Discharge Monitoring Reports revealed the following effluent exceedance(s).	Deficiency: (Narrative) A review of the DMR revealed effluent exceedances. Please refer to Table G in the Appendix for additional details. [Rule 62-600 and 62-610, F.A.C.]
	Corrective Action(s): (Narrative) Please submit documentation to the department indicating how the Facility will ensure compliance with the permitted effluent limitations going forward.

Evaluation Area: Effluent Disposal

Fencing around the effluent disposal site for access control was complete and in good repair. [62-610.518 (10) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that one of the gates in the fence surrounding the Facility's disposal site was damaged.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the damaged gate has been repaired.

Evaluation Area: Biosolids

Does the permittee keep records of biosolids quantities for five years, as applicable (quantities generated, received from source facilities, treated, distributed and marketed, land	Deficiency: (Narrative) At the time of the inspection, the latest sludge hauling receipts were not provided.
	Corrective Action(s): (Narrative) Going forward, please ensure that records are kept and available for five years.

<p>applied, used as a biofuel or for bioenergy, transferred to another facility, or landfilled? [62-640.650 (4)(a) F.A.C.]</p>	
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Evaluation Area: Groundwater	
<p>Are the groundwater monitoring results sent to the Department on Discharge Monitoring Report, Form 62-620.910 (10), F.A.C. and submitted by the DMR due date? [403.161(1)(b) F.S., 62-600.680 F.A.C.]</p>	<p>Deficiency: (Narrative) A review of the DMRs revealed missing and late submissions. Please refer to Table F in the appendix for additional details.</p>
	<p>Corrective Action(s): (Narrative) Please submit the noted missing DMRs and ensure that all DMRs are submitted by the permit required due dates going forward.</p>
<p>After a review of the Discharge Monitoring Reports, are the compliance well parameters meeting the groundwater standards in the time period reviewed (12 months or greater)? [62-520.420 F.A.C.]</p>	<p>Deficiency: (Narrative) A review of the groundwater DMRs revealed exceedances. Please refer to Table H in the appendix for additional details.</p>
	<p>Corrective Action(s): (Narrative) Please submit documentation to the Department indicating how the Facility will address the groundwater exceedances and prevent them going forward.</p>
<p>Do the groundwater monitoring wells meet DEP requirements including tamper-proof locks, unique well label(s), concrete well pad with protective bumpers not containing numerous cracks, and is free of clutter for sampling purposes? [62-520.600 (6)(e) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, the groundwater wells did not meet DEP requirements. Please refer to Table E in the Appendix for additional details.</p>
	<p>Corrective Action(s): (Narrative) Please submit photos to the Department demonstrating that the noted groundwater monitoring well deficiencies have been corrected.</p>
<p>Are groundwater samples being collected and analyzed as required by the permit or enforcement action, including location, well type, sample type</p>	<p>Deficiency: (Narrative) A review of the DMRs revealed missing and late submissions. Please refer to Table F in the appendix for additional details.</p>
	<p>Corrective Action(s): (Narrative) Please submit the noted missing DMRs and ensure that all DMRs are submitted by the permit required due dates going forward.</p>

(grab/composite), time, and frequency? [62-600.670 (1) F.A.C., 62-610.412 (2)(a) F.A.C.]	
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Evaluation Area: SSO Survey	
Does the facility have an Operation and Maintenance Manual for their collection system? [62-604.500 (4) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the Facility did not have a Collections System O&M Manual or map.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the Facility has implemented a Collections System O&M Manual.
Does the facility have a Sewer Overflow Response Plan/procedures for minimizing spills? [62-604.500 (4)(b) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the Facility did not have a Sewer Overflow Response Plan (SORP)/Emergency Response Plan.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the Facility has implemented a SORP/Emergency Response Plan.
Does the facility have a map of its collection system? [62-604.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, the Facility did not have a Collections System O&M Manual or map.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the Facility has implemented a Collections System O&M Manual.
The facility failed to perform routine preventative maintenance to keep the collection/transmission system in good working order. [62-604.500 (2) F.A.C., 62-604.500 (3) F.A.C., SSO5]	Deficiency: (Narrative) At the time of the inspection, it was noted that Lift Station #1 only had one operable pump.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating that the inoperable pump in Lift Station #1 has been repaired.
Does the facility maintain a ready-to-use supply of equipment, tools and materials for responding to SSOs? [62-604.300 (5) F.A.C.]	Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.
	Corrective Action(s): (Narrative) Please submit documentation to the Department demonstrating how the Facility will be prepared to respond to SSOs going forward.
A sewage spill from any part of a collection/transmission system or treatment plant that did not make it to surface waters, i.e., stormwater collection	Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.
	Corrective Action(s): (Narrative)

<p>system, drainage ditch, stream, pond, or lake. [62-604.130 (1) F.A.C., SSO6]</p>	<p>Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
<p>The facility failed to report a sewage spill within 24 hours of discovery. [62-604.550 (2) F.A.C., SSO4]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p>
	<p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
<p>Does the facility follow up on spills? [62-604.300 (5) F.A.C.]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p>
	<p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>
<p>The facility failed to keep routine documentation and reporting records of spills, and/or operation and maintenance activities on the collection/transmission system. [62-604.300 (5) F.A.C., SSO2]</p>	<p>Deficiency: (Narrative) At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.</p>
	<p>Corrective Action(s): (Narrative) Any abnormal event must be reported to the Department for review. Please indicate to the Department why this SSO was not followed up on and how this incident will be avoided in the future.</p>

Inspection Appendix for Citrus Park WWTP (FLA014477)

Table A – Improvement Schedules

Improvement Schedule		
Improvement Action	Due Date	Completed?
1. Repair broken audio alarm at the south station	August 30, 2021	Yes
2. Remove excess vegetation from percolation ponds.	August 30, 2021	Yes

Table B – Buffer, Reagent, and Standard Lot Numbers and Expiration Dates

Standard/Buffer	Lot No.	Expiration Date
DPD Reagent	A3205	July 2028
Chlorine Standards	A3243	September 2025
pH 4.00 s.u.	3GF1085	June 2025
pH 7.00 s.u.	3GG1121	July 2025
pH 10.00 s.u.	3GF	June 2025

Table C – Operator Names and License Numbers

Operator Name	License Class and Number	Expiration Date
Gregor R. St. John	WW Class A - 0008069	4/30/2025

*Table D – Discharge Monitoring Report Deficiencies
01/01/2023 – 12/31/2023*

Monitoring Period	DMR (R-001) Deficiencies
December 2023	<ul style="list-style-type: none"> • There is a calculation error for the monthly Flow average. • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average. • There is a calculation error for the Percent Capacity.
November 2023	<ul style="list-style-type: none"> • There is a calculation error for the monthly Flow average. • There is a calculation error for the three-month Flow average. • There is a calculation error for the annual CBOD (EFA-01) average. • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average. • There is a calculation error for the Percent Capacity.
October 2023	<ul style="list-style-type: none"> • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average.
September 2023	<ul style="list-style-type: none"> • There is a calculation error for the monthly Flow average. • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average. • Data was not reported for the following parameters: <ul style="list-style-type: none"> ○ Fecal Coliform (Maximum, Monthly Geometric Mean and 90th Percentile)
August 2023	<ul style="list-style-type: none"> • There is a calculation error for the three-month Flow average. • There is a calculation error for the annual CBOD (EFA-01) average. • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average. • There is a transcription error for the maximum TSS (INF-01)
July 2023	<ul style="list-style-type: none"> • There is a calculation error for the three-month Flow average. • There is a calculation error for the annual CBOD (EFA-01) average. • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average. • There is a calculation error for the Percent Capacity. • Data was not reported for the following parameters:

Inspection Appendix for Citrus Park WWTP (FLA014477)

	<ul style="list-style-type: none"> o Biosolids (Transferred) o Biosolids (Landfilled)
June 2023	<ul style="list-style-type: none"> • There is a calculation error for the three-month Flow average. • There is a calculation error for the annual CBOD (EFA-01) average. • There is a calculation error for the monthly CBOD (EFA-01) average. • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average. • There is a calculation error for the Percent Capacity.
May 2023	<ul style="list-style-type: none"> • There is a calculation error for the three-month Flow average. • There is a calculation error for the annual CBOD (EFA-01) average. • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average. • There is a calculation error for the monthly geometric mean of Fecal Coliform. • There is a calculation error for the Percent Capacity. • There is a reporting error for Biosolids (Transferred) • There is a reporting error for Biosolids (Landfilled)
April 2023	<ul style="list-style-type: none"> • There is a calculation error for the monthly Flow average. • There is a calculation error for the three-month Flow average. • There is a calculation error for the annual CBOD (EFA-01) average. • There is a calculation error for the monthly CBOD (EFA-01) average. • There is a calculation error for the annual TSS (EFA-01) average. • There is a calculation error for the annual Fecal Coliform average. • There is a calculation error for the monthly geometric mean of Fecal Coliform. • There is a calculation error for the Percent Capacity. • There is a reporting error for Biosolids (Transferred) • There is a reporting error for Biosolids (Landfilled)
March 2023	<ul style="list-style-type: none"> • There is a calculation error for the monthly Flow average. • There is a calculation error for the three-month Flow average. • There is a calculation error for the monthly geometric mean of Fecal Coliform. • There is a transcription error for the maximum CBOD (INF-01) • Data was not reported for the following parameters: <ul style="list-style-type: none"> o CBOD (Annual Average) o TSS (Annual Average) o Fecal Coliform (Annual Average and 90th Percentile) o Percent Capacity o Biosolids (Transferred) o Biosolids (Landfilled)
February 2023	<ul style="list-style-type: none"> • There is a calculation error for the three-month Flow average. • There is a calculation error for the monthly average of CBOD. • Data was not reported for the following parameters: <ul style="list-style-type: none"> o CBOD (Annual Average) o Fecal Coliform (Annual Average and 90th Percentile) o Biosolids (Transferred) o Biosolids (Landfilled)
January 2023	<ul style="list-style-type: none"> • There is a calculation error for the three-month Flow average. • Data was not reported for the following parameters: <ul style="list-style-type: none"> o CBOD o Total Suspended Solids o Fecal Coliform o Percent Capacity o Biosolids (Transferred) o Biosolids (Landfilled)

Table E - Groundwater Monitoring Deficiencies

Well Description	GW Monitoring Wells Deficiencies
MW01	<ul style="list-style-type: none"> • The label on the monitoring well does not match the Monitoring Well ID, or the Alternate Name identified on the permit. • The monitoring well was not locked.
MW02	<ul style="list-style-type: none"> • The label on the monitoring well does not match the Monitoring Well ID, or the Alternate Name identified on the permit. • There is excess vegetation on the well pad. • The monitoring well was not locked.

Inspection Appendix for Citrus Park WWTP (FLA014477)

MW03	<ul style="list-style-type: none"> • The label on the monitoring well does not match the Monitoring Well ID, or the Alternate Name identified on the permit. • There is an ant hill on and around one side of the well pad. • The monitoring well was not locked.
------	--

*Table F – Late or Missing DMRs
12/1/2020 – 12/31/2023*

Monitoring Period	Date Due	Date Received	Days Late
Annual: January – December 2023	1/28/2024	NA	2 (as of the date this report was completed)
Quarterly: October – December 2023 GW	1/28/2024	NA	2 (as of the date this report was completed)
September 2023	10/28/2023	11/28/2023	>30
Quarterly: July – September 2023 GW	10/28/2023	NA	>30
Quarterly: April - June 2023 GW	7/28/2023	NA	>30
Quarterly: January – March 2023 GW	4/28/2023	5/18/2023	18
February 2023	3/28/2023	5/12/2023	>30
January 2023	2/28/2023	5/12/2023	>30
Annual: January – December 2022 GW	1/28/2023	NA	>30
Quarterly: October – December 2022	1/28/2023	6/29/2023	>30
December 2022	1/28/2023	5/12/2023	>30
November 2022	12/28/2022	5/11/2023	>30
October 2022	11/28/2022	12/6/2022	8
Quarterly: July – September 2022 GW	10/28/2022	6/29/2023	>30
September 2022	10/28/2022	12/6/2022	>30
August 2022	9/28/2022	12/6/2022	>30
July 2022	8/28/2022	6/28/2023	>30
Quarterly: April - June 2022 GW	7/28/2022	NA	>30
May 2022	6/28/2022	6/28/2023	>30
April 2022	5/28/2022	6/21/2022	24

*Table G – Effluent Exceedances
12/01/2020 – 12/31/2023*

Date	Monitoring Group	Monitoring Location	Parameter	Parameter Description	Result	Limit	Units	Statistical Base	Explanation
12/31/2023	R-001	EFA-01	P 00530	Solids, Total Suspended	20.52	20.0	mg/L	AB - Annual Average	Repairs need to be made.
12/31/2023	R-001	EFA-01	P 00530	Solids, Total Suspended	81.8	30.0	mg/L	MK - Monthly Average	
12/31/2023	R-001	EFA-01	P 00530	Solids, Total Suspended	81.8	45.0	mg/L	WA - Weekly Average	
12/31/2023	R-001	EFA-01	P 00530	Solids, Total Suspended	81.8	60.0	mg/L	MB - Maximum	

Inspection Appendix for Citrus Park WWTP (FLA014477)

12/31/2023	R-001	EFA-01	P 74055	Coliform, Fecal	342.67	200.0	#/100mL	AB - Annual Average	
11/30/2023	R-001	EFA-01	P 00530	Solids, Total Suspended	62	45.0	mg/L	WA - Weekly Average	None Provided
11/30/2023	R-001	EFA-01	P 00530	Solids, Total Suspended	62	30.0	mg/L	MK - Monthly Average	None Provided
11/30/2023	R-001	EFA-01	P 00530	Solids, Total Suspended	62	60.0	mg/L	MB - Maximum	None Provided
11/30/2023	R-001	EFA-01	P 74055	Coliform, Fecal	339.13	200.0	#/100mL	AB - Annual Average	None Provided
11/30/2023	R-001	EFA-01	P 74055	Coliform, Fecal	2420	800.0	#/100mL	MB - Maximum	None Provided
11/30/2023	R-001	EFA-01	P 74055	Coliform, Fecal	2420	200.0	#/100mL	MM - Monthly Geometric Mean	None Provided
11/30/2023	R-001	EFA-01	P 74055	Coliform, Fecal	2420	400.0	#/100mL	9A - 90th Percentile	None Provided
3/31/2023	R-001	EFA-01	P 74055	Coliform, Fecal	205	200.0	#/100mL	MM - Monthly Geometric Mean	None Provided

*Table H – Groundwater Monitoring Exceedances
12/01/2020 – 12/31/2023*

Date	Parameter	Parameter Description	<Compliance Well(s)>	<Background Well(s) Limit> MWB-21302	Permit Limit(s)	DMR Comments
3/31/2023	P 70295	Solids, Total Dissolved (TDS)	800	780	500.0	None Provided
12/31/2022	P 70295	Solids, Total Dissolved (TDS)	710	660	500.0	
9/30/2022	P 00400	pH	719	7.04	6.5-8.5	
3/31/2022	P 00978	Arsenic, Total Recoverable	10.3	1.11	10.0	
12/31/2021	P 70295	Solids, Total Dissolved (TDS)	1016	724	500.0	
12/31/2021	P 00978	Arsenic, Total Recoverable	18.7	1.33	10.0	
9/30/2021	P 00620	Nitrogen, Nitrate, Total (as N)	85.6	1.17	10.0	
9/30/2021	P 70295	Solids, Total Dissolved (TDS)	1270	444	500.0	Heavy Rain
6/30/2021	P 01113	Cadmium, Total Recoverable	6.6	6.1	5.0	None Provided
3/31/2021	P 70295	Solids, Total Dissolved (TDS)	752	716	500.0	
3/31/2021	P 00978	Arsenic, Total Recoverable	11.7	0.689	10.0	

Inspection Appendix for Citrus Park WWTP (FLA014477)

12/31/2020	P 00620	Nitrogen, Nitrate, Total (as N)	56.6	0.02	10.0	
12/31/2020	P 70295	Solids, Total Dissolved (TDS)	1936	736	500.0	

Alex McSurley



1. Lift Station #1 Control Panel



2. Lift Station #1 Wet Well



3. Lift Station #2 Control Panel



4. Lift Station #2 Wet Well

Alex McSurley



5. Headworks Screen



6. Surge Tank



7. Surge Tank



8. Surge Tank

Alex McSurley



9. Splitter Box



10. Sagging Influent Pipe



11. Aeration Basin and WAS Line



12. Aeration Basin

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13. Aeration Basin



14. Clarifier



15. Stilling Well



16. Clarifier Weir

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17. Clarifier



18. Stilling Well with Vegetation



19. Chlorine Contact Chamber



20. Digester

Alex McSurley



21. Digester with Hole in Wall



22. Digester



23. Rapid Infiltration Basin



24. Rapid Infiltration Basin



25. Rapid Infiltration Basin



26. Rapid Infiltration Basin



27. MW02



28. MW03



29. MW01



30. Broken Gate on Disposal Site Fence



31. Blowers



32. Blowers



33. Blowers



34. Signs of Headworks Overflow



35. Signs of Headworks Overflow (Detritus)



36. Leaking Crack between Digester and Surge



37. Steps with Broken Tread



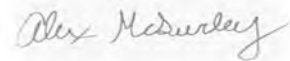
38. Splashing RAS



39. Severely Splashing Return Box

Cirtus Park WWTP (FLA014477)
Photos by Alex McSurley on 1/8/23

I certify that these photos represent the true
on-site conditions observed and have not been
altered in any way.

A handwritten signature in cursive script that reads "Alex McSurley". The signature is written in a dark ink and is centered below the certification text.



SOURCE, INC.
Engineers - Planners
FL Eng. Business #34338

James P. Elliott, P.E., President
Timothy E. Pugh, P.E., Vice President

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Fax (239) 549-6779

E-mail address: Mail@source-inc.com

DRAFT

August 28, 2024

Ms. Alexandria McSurley, Environmental Specialist II
Florida Department of Environmental Protection
2295 Victoria AVE, Suite 364
Fort. Myers, FL 33901

Re: Final Items of Formal Response to Warning Letter Meeting Notes –
Citrus Park WWTP - FLA014477
Source, Inc. Project No. 872-01-23

Dear Alex:

I performed a site inspection last Friday, 8/23/24, to verify completion of three remaining items stipulated in the referenced facility "Formal Response to Warning letter Meeting Notes". Item B3 relates to bi-weekly samples of influent and effluent that require flow paced refrigerated sampling units. This item required purchase and installation of a flow meter, electrical power and control wiring extension – see Photos 1, 2 & 3. Item D23 related to relocating process piping with splitter box to the top of the pre-cast concrete plant structure of proper support. This work to relocate the splitter box and piping has not been completed such that we request a time extension of 6 weeks from the date of this letter to complete Item D23. Item D24 relates to waste activated sludge (WAS) not properly located. The process wasting was corrected utilizing temporary piping and pumping. Permanent WAS piping and pumping systems will be installed, completed within 6 weeks from the date of this letter. During the inspection I again confirmed all air blower units were operational – see Photo 4 blowers serving Plant 2 (North plant). I also noted the new plant access gate – see Photo 5.

We trust the extension of time to address Items D23 and D24 is acceptable to the Department. Should you have any questions do not hesitate to contact us.

Very truly yours,
SOURCE, INC.

James P. Elliott, P.E.
FL License No. 21022

JPE/jbd*

cc: Mark Nicklas
Greg St. John
Eric Zimmerman



PHOTO 1
REFRIGERATED COMPOSITE SAMPLER



PHOTO 2
EFFLUENT FLOW METER



PHOTO 3
EFFLUENT FLOW METER
OUTPUT CONTROL MONITOR



PHOTO 4
BLOWER UNITS FOR AIR SUPPLY TO PLANT 2

CITRUS PARK WWTP
AUGUST 23, 2024



PHOTO 5
NEW PLANT ACCESS GATE



FLORIDA DEPARTMENT OF Environmental Protection

South District
Post Office Box 2549
Fort Myers, FL 33902-2549
SouthDistrict@FloridaDEP.gov

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

Memorandum

TO: File
THROUGH: Landon Reigelman, Environmental Manager
FROM: Alex McSurley, Environmental Specialist II
Deanna Newburg, Environmental Consultant
DATE: April 25, 2024
SUBJECT: Citrus Park WWTP – FLA014477 WL Meeting Notes

Date of Meeting: March 26, 2024
In Attendance: DEP: Alex McSurley, Landon Reigelman, Kaylee Turke
Citrus Park: Gregory St. John, Jim Elliot, Mark Nicklas, Erick Zimmerman

An enforcement meeting was held on Microsoft Teams with Citrus Park representatives on March 26, 2024, based on the Compliance Evaluation Inspection that found the Facility to be out of compliance. The non-compliance issues documented in the inspection report were addressed during the meeting.

A formal response relative to the meeting will be due Friday May 10, 2024. Corrective actions taken by the Facility since the January 8th, 2024, inspection are listed below and include notes from the meeting and the Department's response.

Evaluation Area: Permit

Deficiency:

At the time of the inspection, it was noted that the plant headworks (the bar screen and the surge tanks) were offline and wastewater had been diverted to the flow splitter box.

Response:

The Facility reported that the headworks and all tanks that were previously bypassed are now back online. Additionally, all the piping and valves for the surge tank have been replaced to ensure its functionality and 3 new pumps were added for the surge tank. Photos of the repairs were submitted during the meeting. **No further action is required at this time.**

Corrective Action Documentation:

[https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Evaluation Area: Sampling

Deficiency:

A review of the calibration/verification log revealed that the log did not include acceptance criteria for the pH buffers that are used.

Response:

The Facility will update the logs and submit a copy to DEP with the formal response.

Deficiency:

The Facility failed to collect bi-weekly samples at the required frequency. Additionally, the facility is not collecting composite samples for CBOD (influent and effluent), and TSS (influent and effluent).

Response:

The Facility's operator and engineer have recommended a composite sampler to the Facility. The Facility is in the process of project proposal. A status update will be provided in the formal response.

Deficiency:

The Facility failed to provide their Chain of Custody records.

Response:

The Facility now has a new operations company. During the meeting, they indicated that all records will be kept per permit requirements going forward. Copies of the most recent lab reports and COCs will be submitted with the formal response.

Evaluation Area: Records and Reports

Deficiency:

The Facility did not have a copy of the current O&M Manual onsite.

Response:

The Facility has created a new O&M Manual. A copy of the cover page and table of contents was submitted during the warning letter meeting. **No further action required at this time.**

Corrective Action Documentation:

[https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Deficiency:

At the time of the inspection, the following documents were not available:

- The Facility O&M Manual.
- The most recent sludge hauling receipts.
- The Collections System O&M Manual.
- The Facility's Sanitary Sewer Overflow Response Plan.
- Copies of the Facility's Chains of Custody for both effluent sampling and groundwater sampling.
- Lab report.

Response:

The Facility has created new O&M manuals and SSORP. The Facility will call Karle Enviro-Organic Recycling for records of hauling. A copy of the cover page and table of contents for the new O&M manuals was submitted during the warning letter meeting. A copy of the hauling

records, SSORP, and most recent lab reports and COCs will be submitted with the formal response.

Deficiency:

A review of the DMRs revealed deficiencies. Please refer to Table D in the Appendix for additional details.

Response:

The noted DMR deficiencies occurred under the previous operator. The Facility's current operator will correct and resubmit the deficient DMRs to the best of his ability. An update will be provided in the formal response.

Deficiency:

A records review revealed the Facility has not submitted the annual Reclaimed Water/ or Effluent Analysis Report for 2022 or 2023.

Response:

The Facility reports that they did not have any new non-domestic dischargers during 2022 or 2023. The missing Reclaimed Water/ or Effluent Analysis Reports will be submitted with the box checked for no new non-domestic dischargers. An update will be provided in the formal response. Please be advised that this sampling must be completed during a permit renewal year.

Deficiency:

At the time of the inspection, it was noted that there was evidence of an overflow including dried toilet paper and detritus around the surge tanks. The Department did not receive notification or a report regarding this incident. It was also evident that appropriate cleanup actions were not taken.

Response:

The Facility reports that the surge tank pumps have been replaced, telemetry has been added to surge tank and an SSORP has been created. Documentation of these updates will be submitted with the formal response.

Deficiency:

A review of the DMRs revealed missing and late DMRs.

Response:

The Facility will ensure that all reports are submitted in a timely manner going forward.

Evaluation Area: Facility Site Review

Deficiency:

At the time of the inspection, it was noted that the diffusers in the Facility's surge tanks were severely corroded and inoperable.

Response:

During the meeting, the Facility reported that all diffusers are being replaced. Half have been installed already and the other half are onsite. Photos of the progress on this project were submitted during the meeting. A status update for this project will be provided in the formal response.

If the project is complete, please submit photos in the formal response to demonstrate this.

Deficiency:

At the time of the inspection, the container for collecting screenings and grit at the headworks was severely corroded and, as a result, had several holes that would allow leachate to drain to the ground if it were in use.

Response:

The Facility reported that the dumpster for collecting the screenings has been replaced. A photo of the new dumpster was submitted during the warning letter meeting. **No further action is required at this time.**

Corrective Action Documentation:

[https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Deficiency:

At the time of the inspection, it was noted that the clarifier was not achieving proper settling, and solids were noted discharging over the weir.

Response:

The Facility reported that the clarifiers have been cleaned out and are now functioning as designed. Photos of the cleaned clarifiers were submitted during the meeting. **No further action is required at this time.**

Corrective Action Documentation:

[https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Deficiency:

At the time of the inspection, it was noted that several of the aeration basin diffusers were inoperable. The remaining diffusers were not providing adequate mixing for the aeration basins.

Response:

The aeration basins have been cleaned and the diffusers for half the plant have been replaced. The other half are onsite and will be installed soon. A status update for this project will be submitted with the formal response.

If the project is complete, please submit photos in the formal response to demonstrate this.

Deficiency:

At the time of the inspection, the return line and the RAS line were noted to cause excessive splashing.

Response:

The Facility reported that the box that is splashing will be modified to prevent splashing. The Facility anticipates more remodeling of plant piping, but a splash plate will be put in as a temporary fix until then. A status update for this project will be submitted with the formal response.

If the project is complete, please submit photos in the formal response to demonstrate this.

Deficiency:

At the time of the inspection, there was only one operational blower on the north plant, and two operational blowers on the south plant.

Response:

The Facility reports that they currently have seven blowers. Five are operational. A proposal for the final two will be sent to the Facility soon and may be completed within 30 days. An update will be provided in the formal response.

Additionally, the blowers are being serviced regularly now, and Operations company stocks spare parts for ongoing repairs.

Deficiency:

At the time of the inspection, it was noted that only one of the plant's digesters was operational. The operating digester had a significant hole in the tank wall allowing the contents of the digester and the aeration basin to mix. This was preventing the proper operation of the digester.

Response:

The south plant digester has been cleaned and is back online. The hole in the north plant digester has been repaired. Photos of these repairs were submitted during the warning letter meeting. **No further action is required at this time.**

Corrective Action Documentation:

[https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Deficiency:

At the time of the inspection, it was noted that the Facility has two CCCs that run parallel to each other. The chlorine injection point was only serving one of the two tanks.

Response:

The Facility reported that two pumps will be used going forward. They are still using an extension cord to supply electricity for the second chlorine pump, but a permanent electric hookup will be added. This is expected to be completed in about two months. An update on this project will be provided in the formal response.

Deficiency:

At the time of the inspection, it was noted that the stilling well contained a thick layer of sludge with rags visible on the airline. Additionally, there were plants noted growing in the stilling well.

Response:

During the meeting, the Facility reported that the stilling wells have been cleaned out. Photos were submitted at the meeting. **No further action is required at this time.**

Corrective Action Documentation:

[https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Deficiency:

At the time of the inspection, there were several cracks and leaks noted on the tank walls.

Response:

During the meeting, the Facility reported that all the cracks on the tank walls have been repaired. Photos were provided during the meeting to demonstrate this. **No further action is required at this time.**

Corrective Action Documentation:

[https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depedms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Deficiency:

At the time of the inspection the cover to Lift Station #6 was not locked.

Response:

The Facility reported that upon further investigation, the hinges to this lift station cover were broken. The cover will be repaired, and a lock will be provided for the lift station. Photos of the repairs will be submitted in the formal response.

Deficiency:

At the time of the inspection, Lift Station #6 only had one operational pump.

Response:

During the meeting, the Facility reported that a second pump has been installed at the LS. Please submit documentation of this repair with the formal response.

Deficiency:

The influent line coming from the splitter box and going to the aeration basins was not properly supported. The line was sagging and some joints connecting pipe sections were showing small cracks.

Response:

The Facility indicated that all of the piping needs to be put on top of the Facility. This will, however, likely be a longer term project. The facility will provide an update and proposed timeline for this project in the formal response. DEP will review the proposed timeline to determine if more formal enforcement is needed to complete this project.

Deficiency:

The Waste Activated Sludge (WAS) line was not properly located. The north plant wastes into aeration basin #3, and the south plant sends half of the WAS to the digester, but the other half goes back into aeration basin #1.

Response:

The Facility is wasting correctly now using pumps and independent lines. This is a temporary solution. The problem will be permanently fixed with the other piping issues. An update will be provided in the formal response.

Evaluation Area: Flow Measurement

Deficiency:

At the time of the inspection, the Facility did not provide the most recent flow calibration report.

Response:

The Facility reported that the flow meter will be calibrated soon. They are also going to verify the flow meter is compatible for flow proportionate composite sampling. If not it will be replaced. An update will be provided in the formal response.

Evaluation Area: Operation and Maintenance

Deficiency:

At the time of the inspection, it was noted that one of the sets of stairs at the Facility had a rotted and broken step

Response:

The Facility submitted photos during the warning letter meeting demonstrating that the stairs have been repaired. **No further action is required at this time.**

Corrective Action Documentation:

[https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Deficiency:

Many of the Facility's treatment components were in disrepair indicating that adequate spare parts were not available to conduct the necessary repairs.

Response:

The Facility's new operator will have routine preventive maintenance scheduled for the Facility going forward. Details will be provided in the formal response.

Evaluation Area: Effluent Quality

Deficiency:

A review of the DMR revealed effluent exceedances.

Response:

The Facility reports that TSS is slowly getting back to normal. The operator believes that this will meet requirements going forward. Previous exceedances were due to facility malfunctions that are currently being repaired. An update on the Facility's current effluent quality will be provided in the formal response for Department review.

Evaluation Area: Effluent Disposal

Deficiency:

At the time of the inspection, it was noted that one of the gates in the fence surrounding the Facility's disposal site was damaged.

Response:

The Facility reports that repairs to the gate are planned and will be completed within a month. An update will be provided in the formal response.

Evaluation Area: Biosolids

Deficiency:

At the time of the inspection, the latest sludge hauling receipts were not provided.

Response:

The Facility will call KarIE for records of hauling. An update will be provided in the formal response.

Evaluation Area: Groundwater

Deficiency:

A review of the DMRs revealed missing and late submissions.

Response:

The Facility will reach out to the lab to see if they can get copies of the lab reports for the missing DMRs. If they can, the DMRs will be submitted. Going forward, all reports will be submitted in a timely manner. An update will be provided in the formal response.

Deficiency:

A review of the groundwater DMRs revealed exceedances.

Response:

The Facility indicated that the obvious problems with the wells will be corrected and they are hopeful this will improve the groundwater results. An update will be provided in the formal response.

Deficiency:

At the time of the inspection, the groundwater wells did not meet DEP requirements.

Response:

The Facility reported that the sanitary seals and missing locks have been replaced. An update will be provided in the formal response regarding the other groundwater monitoring well deficiencies that were noted.

Evaluation Area: SSO Survey

Deficiency:

At the time of the inspection, the Facility did not have a Collections System O&M Manual or map.

Response:

The Facility has created new O&M manuals and SSORP. A copy of the O&M Manuals cover page and table of contents was provided during the meeting. **No further action is required at this time.**

Corrective Action Documentation:

[https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=38.1283783.1\]&\[profile=Enforcement_Legal\]](https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=38.1283783.1]&[profile=Enforcement_Legal])

Deficiency:

At the time of the inspection, the Facility did not have a Sewer Overflow Response Plan (SORP)/Emergency Response Plan.

Response:

The Facility has created new O&M manuals and SSORP. A copy of the SSORP will be submitted with the formal response.

The facility will submit their formal response by **Friday, May 10, 2024.**



SOURCE, INC.
Engineers - Planners
FL Eng. Business #34338

James P. Elliott, P.E., President
Timothy E. Pugh, P.E., Vice President

1334 Lafayette Street
Cape Coral, FL 33904-9770
(239) 549-2345
Fax (239) 549-6779
E-mail address: Mail@source-inc.com

October 22, 2024

Ms. Alexandria McSurley, Environmental Specialist II
Florida Department of Environmental Protection
2295 Victoria AVE, Suite 364
Fort. Myers, FL 33901

Re: Final Items of Formal Response to Warning Letter Meeting Notes –
Citrus Park WWTP - FLA014477
Source, Inc. Project No. 872-01-23

Dear Alex:

I performed a site inspection on Monday, 10/21/24, to verify completion of two remaining items stipulated in the referenced facility "Formal Response to Warning Letter Meeting Notes". Item D23 related to relocating process piping with flow splitter box to the top of the pre-cast concrete plant structure for proper support has been completed – see photos 2, 3, 5, 6, 7, 8, 10 and 11. Also above ground process piping between treatment tanks is supported by welded aluminum material – see photos 3 and 13. Item D24 related to waste activated sludge (WAS) piping and pumping systems (replacing temporary piping) has been completed – see photos 2, 4, 9 and 12. We confirmed that all items of the May 9, 2024 Formal Response Letter are complete.

Should you have any questions do not hesitate to contact us.

Very truly yours,
SOURCE, INC.
James P. Elliott, P.E.
FL License No. 21022

JPE/jbd*
Attachments
cc: Mark Nicklas
Gregor St. John
Eric Zimmerman

Printed copies of this document are not considered signed and sealed and the signature must be verified on any electronic copies.

CITRUS PARK WWTP
OCTOBER 21, 2024



PHOTO 1: CLARIFIER RAS AIR LIFT PIPING NORTH PLANT



PHOTO 2: FOREGROUND WAS PIPING
BACKGROUND NORTH PLANT INFLUENT PIPE

CITRUS PARK WWTP
OCTOBER 21, 2024



PHOTO 3: NORTH PLANT INFLUENT PIPING WITH SUPPORT



PHOTO 4: WAS PIPING FROM NORTH PLANT



PHOTO 5: INFLUENT PIPING TO NORTH PLANT



PHOTO 6: PROCESS PIPING SUPPORTED ON TANK TOP
OF WALL SOUTH PLANT



PHOTO 7: SOUTH PLANT INFLUENT PIPE



PHOTO 8: INFLUENT PIPING SUPPORTED
ON TOP OF TANK WALLS



PHOTO 9: WAS PIPING AT DIGESTER

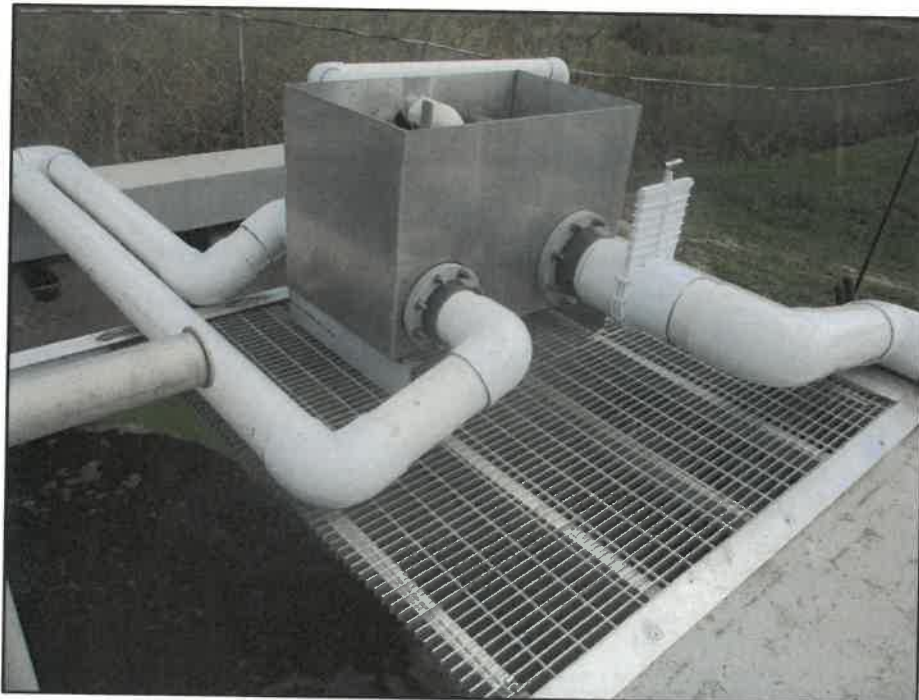


PHOTO 10: RELOCATED FLOW SPLITTER
BOX WITH PIPING CONNECTIONS



PHOTO 11: FLOW SPLITTER BOX



PHOTO 12: WAS PIPING TO SOUTH DIGESTER



PHOTO 13: INFLUENT PIPE FROM
SURGE TANK WITH SUPPORTS



FLORIDA DEPARTMENT OF Environmental Protection

South District
PO Box 2549
Fort Myers FL 33902-2549
SouthDistrict@FloridaDEP.gov

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

April 19, 2023

CPI Citrus Park Owner, LLC
1000 Pennsylvania Ave NW
Washington, DC 20004

Re: Compliance Assistance Offer
Citrus Park RV Resort
Facility ID 5360048
Lee County - PW

Dear CPI Citrus Park Owner, LLC:

A Sanitary Survey Inspection was conducted at your site on February 7, 2023. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving these matters.

Specifically, potential non-compliance with the requirements of Chapters 373 and 403, Florida Statutes, and Chapters 62-550 and 62-555, Florida Administrative Code, was observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the item(s) of concern noted and respond within **30 days** of receipt of this Compliance Assistance Offer. Your response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed.
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the items of concern.

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

CPI Citrus Park Owner, LLC
Compliance Assistance Offer
Citrus Park RV Resort; Facility ID: 5360048
Page 2 of 2

Please address your response and any questions to Vanessa Kraft of the South District Office at (239) 344-5678 or via e-mail at Vanessa.Kraft@FloridaDEP.gov. We look forward to your cooperation with this matter.

Sincerely,



Elizabeth Sweigert
Assistant Director of District Management
South District Office
Florida Department of Environmental Protection

Enclosures: Inspection Report

cc: Keith Madden, General Manager, kmadden@murexproperties.com
Krista Brechel, Controller, kbrechel@murexproperties.com
Eric Zimmerman, ezimmerman@murexproperties.com
Kevin Serrano, Operator, teiwaterservices@gmail.com

Florida Department of Environmental Protection

South District Public Water System Sanitary Survey Inspection Report

Water system: Citrus Park RV Resort / Bonita Terra		System PWS #: 5360048		Survey date: 02/07/2023	
Facility type class: Community - (2C)		Source type: Ground		4-Log approved: No	
Facility address: 25501 Trost Blvd, Bonita Springs, FL 34135					
Facility phone(s): 239-992-3030			Facility email/fax: dswan@citrusparkrv.net		
Facility contact: Keith Madden			Facility contact phone(s): 239-280-8905		
Facility contact email/fax: kmadden@murexproperties.com					
Owner name: CPI Citrus Park Owner, LLC			Company name: CPI Citrus Park Owner, LLC		
Owner/Corp address: 1000 Pennsylvania Ave NW		City: Washington		State: DC	Zip: 20004
Owner/Corp phone(s):			Owner e-contact(s):		
Operator name: Kevin Serrano			Certification: C 24898		
Operator phone(s): 239-249-9033			Operator email/fax: teiwaterservices@gmail.com		
On-site Rep: Operator		Immediate Action Required? Yes		Inspection recap given? Yes	

GENERAL INFORMATION

Number of Service Connections 1,653
 Population Served 3,282
 Plant Design Capacity 540,000 GPD
 Average Day (from MORs) 176,062 GPD
 Max. Day (from MORs) 462,170 GPD
 Total Storage Capacity 294,000 GPD
 Comments:

OPERATION & MAINTENANCE

Certified Operator: Yes No Not required
 Plant visits conducted by: Operator
 O&M Log: Yes No O&M Manual: Yes No
 Visitation Frequency
 Hrs/day: *Required* 6 *Actual* 6
 Hrs/wk: *Required* _____ *Actual* _____
 Days/wk: *Required* 6 *Actual* 6
 Non-consecutive Days? Yes No N/A
 MORs submitted regularly? Yes No N/A
 Data missing from MORs? Yes No N/A

CHLORINATION (Disinfection)

Type: Hypo-Chlorination
 Capacity 1000 x 2 Unit Total Each
 Chlorine Feed Rate 10 on pump
 Avg. Amount of Cl₂ gas used _____
 Chlorine Residuals: Plant 2.9 Remote .2
 Remote tap location Womens Restroom
 Injection Points top of clearwell
 Booster Pump Info _____
 Comments:

POE: 11:43am, Remote: 11:51 am
 Department recommends to flush system to maintain continuous minimum combined chlorine residual of 0.6 mg/L.

AERATION (Gases, Fe, & Mn Removal)

Type Forced Draft Capacity UNK
 Aerator Condition Good
 Visible Algae Growth Yes No
 Protective Screen Condition Good
 Comments:

Unknown when whiffle balls were last cleaned/replaced.

RAW WATER SOURCE

GROUND; Number of Wells 3
 SURFACE/UDI; Source _____
 PURCHASED from PWS ID # _____
 Emergency Water Source _____
 Emergency Water Capacity _____

AUXILIARY POWER SOURCE

Yes None Not Required
 Source Generator
 Capacity of Standby (kW) 150
 Switchover: Automatic Manual
 Standby Plan: Yes No
 Hrs Operated Under Load 3 hrs a month
 What equipment does it operate?
 Well pumps _____
 High Service Pumps _____
 Treatment Equipment _____
 Satisfy 1/2 max-day demand? Yes No Unk
 Comments:

No Standby Plan onsite.

DISTRIBUTION SYSTEM

Flow Measuring Device Flow Meter
 Meter Size & Type Tek-FLUX 1400 A
 Meter tested w/i 5 yrs? Yes No Unk N/A
 Backflow Prevention: Yes No
 Cross-connections _____
 Cross-connection Control Program: Yes No N/A
 Coliform Sampling Plan: Yes No
 Stage 2 DBPs Sampling Plan: Yes No N/A
 Lead & Copper Sampling Plan: Yes No N/A
 Comments:

Flow Meter calibrated in 2020,

SERVICE AREA CHARACTERISTICS:

Mobile Home Park

Food Service: Yes No N/A

OTHER TASTE/ODOR CONTROL PROCESSES

Explain:

AMMONIATION

Capacity 500 (gal) Injection Points Storage Tank

Comments:

3.5 feed rate

CORROSION CONTROL

Capacity _____ (gal) Injection Points _____

Chemicals Used _____

Comments:

COAGULATION (Turbidity Removal)

Chemicals Used _____

Is settling OK? Yes No

Comments:

SOFTENING (Ca/Mg Hardness Removal)

Chemical Precipitation Process:

Chemicals Used:

Is settling OK? Yes No

Excessive carry-over? Yes No

Secondary Precipitation Yes No

Recarbonation Type _____

Sludge Recirculation Used Yes No

Comments:

Ion Exchange Process:

Capacity _____ (gal)

Grade of Salt for Regeneration _____

Backwash Effluent Destination _____

Comments:

STABILIZATION

Effluent S.I. _____

Is pH control done? Yes No

Chemical Used Anti Scalent

Injection Point Injected into RO

pH Range of Effluent _____

Comments: 50 gal tank, pump set at 15.

SUBPART H/UDI TURBIDITY METERS

Each filter has a turbidity meter Yes No

Combined turbidity meter probe Point(s):

Last time calibrated _____

Comments:

FILTRATION (Suspended Solids Removal)

Type _____

Size _____ No. of Units _____

Length of Filter Runs _____

Type of Filter Media _____

Is media visible? Yes No

Clean after BW? Yes No

Filter Rate _____ BW Rate _____

Filter Capacity _____

Cracks/Cementation/Channeling Yes No

Effluent Stability _____

Algae Growth Yes No

Turbidity in clearwell? Yes No

Comments:

REVERSE OSMOSIS (Dissolved Solids Removal)

Pressure 20 (psi)

No. of Modules 4 Permeate Cap. _____

Blend Rate (GPM) _____

Chemicals Used Anti Scalant

Waste-to-product Ratio 70/30

Pre-treatment _____

Effluent Quality: TDS (mg/L) _____

Waste Disposal Site UNK

IW Permit # & Expir. Date _____

Comments:

RO System not working at time of inspection. The RO has been having intermittent issues, the repairs of this have already been scheduled. Unknown what type of filter is being used.

FLUORIDATION

Chemical Used _____ Strength _____

Corrosion Noted Yes No

Plugging Noted Yes No

High Level Ventilation (acid) Yes No

Acid carboys/day tank vented outside Yes No

Designated Electrical Outlet (acid) Yes No

Analytical Testing Equipment Yes No

Anti-siphon Valves Yes No

Residual Range _____

Point of Application _____

Emergency Eyewash Yes No

Comments:

STORAGE FACILITIES

Tank Type	Ground	Clearwell							
Capacity	294,000	UNK							
Material	Steel	Concrete							
By-pass Piping	No	No							
Gravity Drain	Yes	No							
PRV/ARV	None	None							
Protected Openings	Yes	Yes							
Pressure Gauge	Yes	No							
Sight Glass or Level Indicator	N/A	N/A							
Fittings for Sight Glass	N/A	N/A							
Access Padlocked	Yes	Yes							
Last Inspection Date (for tanks with access manholes)	2021	N/A							
On/Off Pressure	N/A	N/A							
Height to Bottom of Elevated Tank	N/A	N/A							
Height to Max. Water Level	21-23 ft	N/A							

Comments:

Ground Storage Tank was cleaned and inspected in 2021.

HIGH SERVICE (HSP), BACKWASH (BWP), TRANSFER (TP) and OTHER (OP) PUMPS

Pump Purpose	High Service	Transfer							
Pump Number	X3	X2							
Type	Centrifugal	Centrifugal							
Capacity (gpm)	400	UNK							
Motor HP	15	5							
Date Installed	2016	UNK							

Comments:

Transfer Pumps are alternated.

GROUND WATER SOURCE

Well Name (System Identification)		Well 3 (well 1)	Well 5 (well 2)	Well 4 (well 3)	
Florida Well ID		AAC4170	AAC4171	AAC4172	
Year Drilled		1989	1991	1989	
Depth Drilled		117	110	112	
Length (outside casing)		UNK	UNK	UNK	
Diameter (outside casing)		UNK	UNK	UNK	
Is inundation of well possible?		<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input checked="" type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
6' X 6' X 4" Concrete Pad		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
PUMP	Type	Submersible	Submersible	Submersible	
	Rated Capacity (gpm)	200	200	200	
	Motor Horsepower	7.5	7.5	7.5	
Well casing 12" above grade?		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
Well Casing Sanitary Seal		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
Raw Water Sampling Tap		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
Above Ground Check Valve		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
Fence/Housing		<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
Well Vent Protection		<input type="radio"/> Yes <input checked="" type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No

COMMENTS:

Well 3 (Well 1) is missing well vent.

TREATMENT PROCESSES IN USE:


Chlorination, Ammonia, Reverse Osmosis

Is additional treatment needed? Yes No
 If so, for control of what deficiencies?

MONITORING VIOLATIONS	MCL VIOLATIONS
------------------------------	-----------------------

MONITORING COMMENTS:

DEFICIENCIES:

Deficiency	Rule Reference	Corrective Action	Severity	Corrected
What operator called Well 1 was missing a well vent. See photo 2.	62-555.320(8)(c) F.A.C.	Provide a well vent that is at least 12 inches above well pad in a down turned position above the top of the casing and covered by a 24 mesh, corrosion-resistant screen.	Minor	
Only paperwork on site was the log book, O&M Manual and log book, and site map.	62-555.350 F.A.C.	Please add Operation & Maintenance Manual (including valve and flushing exercising in manual), Tank Inspection Report, Cross Connection Control Plan, Lead and Copper Sample Plan, Bacteriological Sample Plan, Disinfection By-Products Plan, Standby Plan for Generator, Flow Meter Calibration Records, and Emergency Response Plan. Received Lead & Copper Sample Plan, Disinfection By-Products Plan, Flow Meter Calibration Records, and Tank inspection records but without engineer seal on February 5, 2023. 	Minor	
All 3 wells on site did not have a Well ID Tag on the casing and Operator could not tell me which one was Well 3 (AAC4170), Well 5 (AAC4171) and Well 4 (AAC4172).	62-555.350 F.A.C.	Please properly identify wells.	Minor	
Fence and barbed wire by ground storage tank needs repair. See Photo 14 & 15.	62-555.315(1) F.A.C.	Please enclose the wellhead(s), treatment facilities, storage tanks, and pumping facilities within a security fence with a locking access gate.	Minor	
It is unknown when the aerator and wiffle balls in degasifer were last cleaned.	62-555.320(2) F.A.C.	Accumulated sludge and biogrowths shall be cleaned routinely (i.e., at least annually) from all treatment facilities that are in contact with raw, partially treated, or finished drinking water and that are not specifically designed to collect sludge or support a biogrowth.	Minor	
RO was not functional at the time of the inspection. System is not functioning as designed.	62-555.320(2) F.A.C.	Please get the treatment process/plant function as designed. Response: The RO has been having intermittent issues, the repairs of this have already been scheduled.	Minor	

Any deficiency marked with an asterisk (*) is a repeat violation.

ADDITIONAL COMMENTS:

Inspector: Vanessa Kraft
Digitally signed by Vanessa Kraft
 Date: 2023.03.29 13:14:18 -04'00'

Approved by: Dessy Owiti
Digitally signed by Dessy Owiti
 Date: 2023.04.03 05:47:32 -04'00'

I certify that these photos represent the true on-site conditions observed and have not been altered in any way.

Vanessa Kraft

Citrus Park RV Park (5360048)
Photos by Vanessa Kraft on 02/07/2023



Photo 1: View of Well.



Photo 2: View of Well missing well vent.



Photo 3: View of Well.



Photo 4: View of Well.



Photo 5: View of Forced Draft Aerator.



Photo 6: View of chemical containers.



Photo 7: View of Ammonia Tank.



Photo 8: View of Chlorine Tanks.



Photo 9: View of RO Trains and System.



Photo 10: Continued view of RO trains.



Photo 11: View of Transfer Pumps.



Photo 12: View of High Service Pumps.



Photo 13: View of Ground Storage Tank.



Photo 14: View of broken fence.



Photo 15: Continued view of broken fence.



April 26th, 2023

Florida Dept. of Environmental Protection
Vanessa Kraft – South District
PO Box 2549
Ft. Myers, FL 33902-2549

Re: Sanitary Survey
Citrus Park RV Resort (dba Bonita Terra)
Facility ID # 5360048

Dear Vanessa,

In reference to your letter dated April 19th, 2023, below are responses to your inquiries and requests located in the “deficiencies” portion of your report:

- **“Well 1 missing a well vent.”**

Operator will install a well vent which will meet specifications listed on report on or before 5/31/2023.

- **“The only paperwork located on site was a log book, O&M Manual and site map.”**

Operator will update O&M Manual and include all missing paperwork specified in report on or before 5/31/2023.

- **“The 3 wells on site did not have “Well ID Tags” on their casing. Operator could not determine which was Well 3,4 & 5.”**

We have obtained a site map and will use it properly to identify and tag each well on or before 5/31/2023.

- **“Fence and barbed wire by ground storage tank needs repair.”**

Fencing and barbed wire have been repaired by Bonita Terra Management.

- **“It is unknown when the aerator and wiffle balls in degasifier were last cleaned.”**

Operator will clean aerator and wiffle balls and in the future, include maintenance information to the O&M Manual. This will be completed by 5/31/2023.

- **“RO was not functional at the time of the inspection. System is not functioning as designed.”**

Repairs have been scheduled and will be completed by 5/31/2023.

Upon completion, photo documentation will be sent to you at the following email address: Vanessa.kraft@floridadep.gov. Please let me know if you have any questions or concerns relating to this matter.

Sincerely,

Catherine Tracy
Thompson Environmental
(239) 898-5626
teiwaterservices@gmail.com

X 
Catherine Tracy

CC: Mark Nicklas General Manager of Bonita Terra
CC: Eric Zimmerman COO of Murex Properties





FLORIDA DEPARTMENT OF Environmental Protection

South District
PO Box 2549
Fort Myers FL 33902-2549
SouthDistrict@FloridaDEP.gov

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Shawn Hamilton
Secretary

August 15, 2023

Eric Zimmerman
CPI Citrus Park Owner, LLC
555 Mission Street, Suite 3300
San Francisco, CA 24105
ezimmerman@murexproperties.com

Re: Warning Letter – Lead Exceedance
Citrus Park RV Resort
PWS-ID No. 5360048
Lee County – PW

Dear Mr. Zimmerman:

A file review of lead and copper tap sample results submitted on October 12, 2022, shows the above referenced water system exceeded the action level for lead at the 90th percentile. According to the Environmental Protection Agency's rule for Control of Lead and Copper, Title 40 CFR 141, Subpart I, the above referenced water system must perform additional water quality parameter sampling, implement corrosion control treatment in the distribution system and educate customers about lead levels detected in the water system. If you have performed follow-up actions to address the exceedance, please submit any documentation to the Department.

The system is on an increased monitoring schedule and must perform lead and copper tap sampling every six months. The next six-month monitoring period runs from July 1, 2023, to December 31, 2023.

Please contact George Ugartemendia at George.Ugartemendia@FloridaDEP.gov 239-344-5623 within **15 days** of receipt of this Warning Letter to arrange a meeting to discuss this matter. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Sweigert".

Elizabeth Sweigert
Assistant Director of District Management
South District Office
Department of Environmental Protection

Eric Zimmerman
Warning Letter
Citrus Park RV Resort; PWS-ID No. 5360048
Page 2 of 2
August 15, 2023

Cc: Mark Nicklas mnicklas@murexproperties.com
Krista Brechel kbrechel@murexproperties.com
Thompson Environmental, Inc. TEIWaterServices@gmail.com



PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

See page 6 for instructions.

I. General Information			
Public Water System (PWS) Name:			
PWS Identification Number:		PWS Type: <input type="checkbox"/> Community <input type="checkbox"/> Non-Transient Non-Community	
PWS Size: <input type="checkbox"/> Small <input type="checkbox"/> Medium <input type="checkbox"/> Large		Total Population Served:	
Population Interval:* <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input type="checkbox"/> F <input type="checkbox"/> G			
PWS Owner:			
Contact Person:		Contact Person's Title:	
Contact Person's Mailing Address:			
City:		State:	Zip Code:
Contact Person's Telephone Number:		Contact Person's Fax Number:	
Contact Person's E-Mail Address:			

* The minimum number of tap sample sites for lead and copper (LC) and water quality parameter (WQP) distribution system sample sites is based on a system's population interval, which is selected from the table below. For the purposes of this form, the population served is the sum of the number of permanent residents and the number of additional non-transient persons to whom the system is available, such as school children, office and commercial employees, and seasonal residents.

Total Population Served	Population Interval	LC Sites	WQP Sites
<i>greater than 100,000</i>	<i>A</i>	<i>100</i>	<i>25</i>
<i>50,001 to 100,000</i>	<i>B</i>	<i>60</i>	<i>10</i>
<i>10,001 to 50,000</i>	<i>C</i>	<i>60</i>	<i>10</i>
<i>3,301 to 10,000</i>	<i>D</i>	<i>40</i>	<i>3</i>
<i>501 to 3,300</i>	<i>E</i>	<i>20</i>	<i>2</i>
<i>101 to 500</i>	<i>F</i>	<i>10</i>	<i>1</i>
<i>less than 101</i>	<i>G</i>	<i>5</i>	<i>1</i>

II. Records Review

Locate and review existing plans, drawings, and reports of the water system and also those kept by county or municipal building departments or code enforcement offices to identify available sampling sites and the total number of lead service lines in the distribution system.

A. Identification of Interior Plumbing Material Types

Identify single-family and multiple-family residences and buildings that have interior plumbing containing lead pipe, copper pipe with lead solder installed after December 31, 1982, or copper pipe with lead solder installed before January 1, 1983; and identify structures with brass faucets and those with point-of-entry or point-of-use devices.

Required sources of review (check after review):

- Plumbing or building codes.
- Plumbing or building permits.
- Contacts within the building department, municipal clerk's office, or State regulatory agencies for historical documentation of the service area development.
- Review of drinking water sampling results, such as those from lead testing in schools.

Optional sources of review (check those utilized):

- Interviews with building inspectors.
- Survey of service area plumbers about when and where lead solder was used from 1983 to the present.
- Survey of residents in the sections of the service area where lead pipe and/or copper pipe with lead solder is suspected to exist.
- Interview of local contractors and developers.

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

PWS Identification Number: _____

B. Identification of Lead Service Lines and Components with Lead Content

Identify the number and location of lead service lines and identify the location of water distribution system components that contain lead.

Required sources of review (check after review):

- Distribution system maps and record drawings.
- Information collected on the presence of lead and copper as required under 40 CFR 141.42, Special Monitoring for Corrosivity Characteristics.
- Capital improvement plans or master plans for distribution system development.
- Current and historical standard operating procedures or operation and maintenance manuals for the type of materials used to install service connections.
- Utility records, including meter installation records, customer complaint investigations, and other historical documents, that indicate or confirm the location of lead service connections.
- Drinking water sampling results that indicate that a structure is susceptible to lead in drinking water.

Optional sources of review (check those utilized):

- Interviews with utility employees familiar with past construction practices.
- Service line sampling where lead service lines are suspected to exist but their presence is not otherwise confirmed.
- Review of permit files.
- A community survey.
- Interview of local pipe suppliers, contractors, and developers.

III. Materials Survey

Fill out the following Materials Survey Summary Table to summarize the results of the records review performed under Part II of this form to identify a sampling pool of lead and copper tap sampling sites.

Materials Survey Summary	Type of Structure Being Served		
	SFRs	MFRs	BLDGs
	Number of Service Connections		
A. Interior Plumbing Material Sites			
Lead Pipe			
Copper Pipe With Lead Solder Installed After 1982			
Copper Pipe With Lead Solder Installed Before 1983			
Brass Faucets			
Point-of-Use or Point-of-Entry Treatment Devices			
Lead-Lined Water Coolers			
Other Lead Plumbing Components			
B. Lead Service Line Sites			
Total Initial Number of Lines that Are Entirely Lead and Subject to Replacement			
Partial Lead Lines	Goosenecks		
	Pigtails		
C. Lead Distribution System Component Sites			
Service Connections Within 100 feet of Distribution System Components Containing Lead			
D. Total No. of Service Connections to Available Sampling Sites			
E. Total Number of Service Connections in Distribution System			

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

PWS Identification Number: _____

VI. Certification

A. Site Selection Criteria

Whenever possible, lead and copper tap sample plans must include tier 1 sites exclusively. Explain the selection of other than tier 1 sites; and if sites were changed from one monitoring period to another, explain why the sites were changed (attach additional pages if necessary).

B. Lead Service Line Sites

When lead service line sites are identified, they must comprise at least 50 percent of the selected samples. Explain why the percentage of lead service line sites is not at least 50 percent of the required number of sampling sites (attach additional pages if necessary).

C. Water Quality Parameter Sampling Plan

If any WQP distribution system sampling sites are not also microbiological sampling sites, explain how the selected WQP distribution system sampling sites represent water quality throughout the distribution system based on the distribution of population, the different sources of water and treatment methods, and an even distribution of sampling throughout the six-month sampling period (attach additional sheets as necessary).

I am duly authorized to sign this form on behalf of the PWS identified in Part I of this form. I certify that the information provided on this form is true and accurate to the best of my knowledge and belief. I certify that the information listed and checked in Part II of this form was used to perform the materials survey in order to identify the total number of lead service lines in the PWS and to establish the sampling pool and sampling plans. I also certify that the number of lead service lines reported in Part III of this form is the total known number of lead service lines in the PWS and that the selected sampling sites in Part IV of this form are the highest risk sites available.

Signature and Date

Printed or Typed Name

Title

PWS SAMPLING PLAN FOR LEAD AND COPPER TAP SAMPLES AND WATER QUALITY PARAMETERS

INSTRUCTIONS: This form shall be completed and submitted by community water systems (CWSs) and by non-transient non-community water systems (NTNCWSs). Complete all parts of this form, attach any maps and written narrative describing the sampling plan, and submit the completed form and any attachments to the appropriate Department of Environmental Protection (DEP) District Office or Approved County Health Department (ACHD) 30 DAYS PRIOR TO THE BEGINNING OF A SIX-MONTH MONITORING PERIOD FOR LEAD AND COPPER IN DRINKING WATER. All information provided on this form shall be typed or printed in ink. The DEP District Office or ACHD will notify a system of approval of a Sampling Plan in writing, which will provide the system notice to proceed. Submit a revised Sampling Plan using this form if any changes in the selection of sampling sites must be made. When no changes have been made, no resubmission is necessary prior to sampling during the next six-month sampling period.

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

In A and B, show, by type of structure being served (i.e., single-family residences [SFR], multiple-family residences [MFR], or other buildings [BLDG]), the number of service connections to sites having the listed interior plumbing material characteristics or the listed service line characteristics. In C, show, by type of structure being served, the number of service connections within 100 feet of distribution system components containing lead. In D, show, by type of structure being served, the total number of service connections to available sampling sites. In E, show, by type of structure being served, the total number of service connections in the distribution system.

The following specific instructions are for the table in Part IV of this form.

ID. Enter a site identification number of up to three digits.

TIER. Enter the tier number of each site. Lead and copper tap sampling sites are categorized as tier 1, for the highest risk, to tier 2, 3, or 4 for successively lower risks. The tier categories are different for CWSs and NTNCWSs. For CWSs, tier 1 sites are single-family residences or child care facilities that contain either: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. Multiple-family residences are tier 1 when they comprise at least 20 percent of the structures served by the system. For CWSs, tier 2 sites include buildings and multiple-family residences that contain: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. For CWSs, tier 3 sites consist of single-family residences that contain copper pipe with lead solder installed before January 1, 1983. For CWSs, tier 4 sites are those that are identified as susceptible to lead or copper contamination but not belonging to one of the other tiers. For NTNCWSs, tier 1 sites are buildings that contain: copper pipe with lead solder installed after December 31, 1982, lead pipe, or a lead service line. For NTNCWSs, tier 2 sites are buildings that contain copper pipe with lead solder installed before January 1, 1983. For NTNCWSs, tier 3 sites are those identified as susceptible to lead or copper contamination and are the same as CWS tier 4 sites. When too few tier 1 sites are identified, tier 2 sites must be located to develop the sampling plan and so on through tiers 3 and 4.

TYPE, LOCATION, and CONTACT PERSON. Enter the type of structure in the Type column. Site types are identified as a single-family residence (SFR), a multiple-family residence (MFR), or a building (BLDG). Enter the street address of the site in the Location column and the name and phone number of the building or residence owner in the Contact Person column.

LSL and HOME PLUMBING MATERIAL. Enter a "Y" in the LSL column to identify a site with a lead service line. The plumbing material must be identified for each site in the Home Plumbing Material column. Enter one of the following:

- "Pb1" to identify a site with lead solder installed after December 31, 1982;
- "Pb2" to identify a site with lead solder installed before January 1, 1983;
- "LP" to identify a site with lead pipe;
- "BF" to identify tier 4 sites (tier 3 for NTNCWSs) that have brass faucets;
- "WC" to identify tier 4 sites that have water coolers with lead content;
- "POE" or "POU" to identify tier 4 sites that have a point-of-entry or point-of-use treatment device, respectively; or
- "LC" to identify a tier 4 site within 100 feet of a lead component in the distribution system.

FIELD VERIFIED, SITE STATUS, and TRAINING STATUS. Show if the site's home plumbing or service line material has been field verified by a "Y" in the Field Verified column. Sites selected for sampling should be indicated by entering an "S" in the Site Status column. Optional sites are identified by an "O." To be a selected site, there must be an agreement with the site building owner to sample himself or to have the site sampled by the system. All homeowners who will sample at the selected sites must receive training in sampling procedures. Indicate which homeowners have received training by a "Y" in the Training Status column.

The following specific instructions are for the table in Part V of this form.

ID NUMBER. Use a two-digit number as an identification number.

LOCATION. The street address should be given as the site location.

TARGET DATES. List target sampling dates for the two required sampling rounds to demonstrate how sampling will evaluate seasonal water quality differences.

Stage 2 D/DBPR Monitoring Plan

System Name:		PWSID:
Contact Name:	Contact E-Mail:	Contact Phone:

Stage 2 Compliance Monitoring Location ID	Location Type	Justification	Projected Sampling Date(s) (day, week, or month)			
			Calendar Quarter 1 (Jan 1 – Mar 31)	Calendar Quarter 2 (Apr 1 – Jun 30)	Calendar Quarter 3 (Jul 1 – Sep 30)	Calendar Quarter-4 (Oct 1 – Dec 31)
	<input type="checkbox"/> Highest TTHM <input type="checkbox"/> Highest HAA5 <input type="checkbox"/> Stage 1 D/DBPR <input type="checkbox"/> Other					
	<input type="checkbox"/> Highest TTHM <input type="checkbox"/> Highest HAA5 <input type="checkbox"/> Stage 1 D/DBPR <input type="checkbox"/> Other					

Instructions: Add rows as necessary to list all Stage 2 compliance monitoring locations. For each location, provide an ID number and/or address. For each location, check the location type and provide justification for selection of the location. For each location, provide the projected sampling date (day, week, or month) within the monitoring period(s) required for your system; e.g., provide one date within Calendar Quarter 3 if your system is required to monitor yearly or provide one date within each of the four calendar quarters if your system is required to monitor quarterly.

Compliance Calculation Procedures

- This system is monitoring yearly or less frequently. Compliance is calculated as follows: If sample result for each monitoring location is \leq the maximum contaminant level (MCL), the system is in compliance. If sample result for any monitoring location is $>$ MCL, system is placed on quarterly monitoring starting with the current quarter.
- This system is monitoring quarterly. Compliance is calculated as follows: for each monitoring location, calculate the locational running annual average (LRAA)—the average of results for samples taken at the monitoring location during the previous four calendar quarters $([Q1+Q2+Q3+Q4]/4)$ —and determine if each LRAA is \leq the MCL.
- This system is monitoring more frequently than quarterly. Compliance is calculated as follows: for each monitoring location, average all samples taken in a quarter at the monitoring location to determine a quarterly average and then calculate the LRAA—the average of quarterly averages at the monitoring location during the previous four calendar quarters $([Q1+Q2+Q3+Q4]/4)$ —and determine if each LRAA is \leq the MCL.

Combined Distribution System Information

- This PWS is part of a combined distribution system.

CITRUS PARK RV RESORT PWS ID# 5360048

2024 ANNUAL DRINKING WATER QUALITY REPORT

Este informe continene información muy importante sobre su agua beber. Tradúscalo ó hable con un amigo quien lo entienda bien.

We're pleased to present to you this year's Annual Drinking Water Quality Report. This report is designed to inform you about the quality water and services we deliver 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. We are committed to ensuring the quality of your water. If you have any questions or concerns about the information provided in this report, please feel free to call any of the numbers listed.

WHERE YOUR WATER COMES FROM

The water source for Citrus Park RV Resort is ground water which is withdrawn from two wells in the Lower Tamiami Aquifer, and one Surficial Aquifer. The water is treated by reverse osmosis, aeration, and chloramine to destroy microbes prior to delivery to customers.

HOW WE ENSURE YOUR DRINKING WATER IS SAFE

The Citrus Park RV Resort routinely monitors for contaminants in your drinking water according to Federal and State laws, rules, and regulations. Except where indicated otherwise, this report is based on the results of our monitoring for the period of January 1 to December 31, 2024. The state allows us to monitor for some contaminants less than once per year because the concentrations of these contaminants do not change frequently. Some of our data, though representative, are more than one year old. Data obtained before January 1, 2024 and presented in this report is from the most recent testing done in accordance with laws, rules, and regulations.

ADDITIONAL HEALTH INFORMATION

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 or 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 operations, 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, the EPA prescribes regulations, which limit the amounts of certain contaminants in water provided by public water systems. The Food and Drug Administration (FDA) 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 some 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 Environmental Protection Agency's Safe Drinking Water Hotline at 1-800-426-4791.

FOR CUSTOMERS WITH SPECIAL HEALTH CONCERNS

Some people may be more vulnerable to contaminants in drinking water than the general population. Immunocompromised 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. EPA/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).

HOW TO REACH US

If you have any questions about this report concerning your water utility, please contact Water Technology, Inc. at 888-834-2905. Citrus Park RV Resort can be reached by contacting 239-992-3030; Fax no. 239-992-4130. We want our valued customers to be informed about their water utility.

SOURCE WATER ASSESSMENT PLAN

The Florida Department of Environmental Protection (FDEP) performed a Source Water Assessment on our system in 2024 and a search of the data sources indicated no potential sources of contamination near our wells. The assessment results are available on the FDEP Source Water Assessment and Protection Program website at <https://prodapps.dep.state.fl.us/swapp/>; or they can be obtained from Citrus Park RV Resort.

HOW TO READ THE TABLE

The terms used in the water quality summary table and in other parts of this report are defined below.

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

Maximum contaminant level or MCL – the highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology.

Maximum contaminant level goal or MCLG – the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs 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.

N/A – not applicable,

ND – means not detected and indicates that the substance was not found by laboratory analysis.

ppm – parts per million or milligrams per liter is one part by weight of analyte to one million parts by weight of the water sample.

ppb – parts per billion or micrograms per liter is one part by weight of analyte to one billion parts by weight of the water sample.

pCi/l – picocuries per liter is a measure of the radioactivity in water

Treatment technique (TT) – a required process intended to reduce the level of a contaminant in drinking water.

**2024 WATER QUALITY SUMMARY
NON-SECONDARY CONTAMINANTS TABLE - PWS ID NO. 5360048**

5360048

Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	MCL Violation Y/N	Level Detected ^B	Range of Results	MCLG	MCL	Likely Source of Contamination	
Inorganic Contaminants								
Nitrate as nitrogen (ppm)	12/24	N	0.24	0.1-0.24	10	10	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.	
Barium (ppm)	12/24	N	0.035	N/A	2	2	Discharge of drilling wastes; discharge from metal refineries; erosion of natural deposits	
Fluoride (ppm)	12/24	N	0.59	N/A	4	4.0	Erosion of natural deposits; discharge from fertilizer and aluminum factories. Water additive which promotes strong teeth when at the optimum level of 0.7 ppm	
Sodium (ppm)	12/24	N	72.2	N/A	N/A	160	Saltwater intrusion; Leaching from the soil	
Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	MCL Violation Y/N	Level Detected ^B	Range of Results	MCLG	MCL	Likely Source of Contamination	
Radioactive Contaminants								
GROSS ALPHA INCL RADON AND URANIUM	12/24	N	2.8	N/A	0	15	Erosion of natural deposits	
Radium 226 + 228	12/24	N	2.59	N/A	0	5	Erosion of natural deposits.	
Disinfectant or Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	MCL or MRDL Violation Y/N	Level Detected ^B	Range of Results	MCLG or MRDLG	MCL or MRDL	Likely Source of Contamination	
Stage 1 Disinfectants and Disinfection By-Products								
Chloramines (ppm)	Monthly 2024	N	2.98	0.8-4.5	MRDLG=4.0	MRDL=4.0	Water additive used to control microbes	
Stage 2 Disinfectants and Disinfection By-Products								
Haloacetic acids (HAA5) (ppb)	09/24	N	22.8	N/A	N/A	60	By-product of drinking water disinfection	
Total Trihalomethanes-TTHM (ppb)	09/24	N	37.4	N/A	N/A	80	By-products of drinking water disinfection	
Disinfectant or Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	AL Exceeded Y/N	90 th Percentile Result	No. of Sampling Sites Exceeding	Range of Results	MCLG or MRDLG	AL (Action Level)	Likely Source of Contamination
Lead and Copper (Tap Water) ^A								
Copper (tap water) (ppm)	6/24	N	0.056	0	0.025-0.056	1.3	1.3	Corrosion of household plumbing systems; Erosion of natural deposits; Leaching from wood preservatives
Lead (tap water) (ppb)	6/24	N	5.3	0	3.0-5.3	0	15	Corrosion of household plumbing systems and service lines connecting buildings to water mains; erosion of natural deposits.

TABLE NOTES:

A. If present Lead can cause serious health effects in people of all ages, especially pregnant people, infants (both formula-fed and breastfed), and young children. Lead in drinking water is primarily from materials and parts used in service lines and in home plumbing. Citrus Park is responsible for providing high quality drinking water and removing lead pipes but cannot control the variety of materials used in the plumbing in your home. Because lead levels may vary over time, lead exposure is possible even when your tap sampling results do not detect lead at one point in time. You can help protect yourself and your family by identifying and removing lead materials within your home plumbing and taking steps to reduce your family's risk. Using a filter, certified by an

American National Standards Institute accredited certifier to reduce lead, is effective in reducing lead exposures. Follow the instructions provided with the filter to ensure the filter is used properly. Use only cold water for drinking, cooking, and making baby formula. Boiling water does not remove lead from water. Before using tap water for drinking, cooking, or making baby formula, flush your pipes for several minutes. You can do this by running your tap, taking a shower, doing laundry or a load of dishes. If you have a lead service line or galvanized requiring replacement service line, you may need to flush your pipes for a longer period. If you are concerned about lead in your water and wish to have your water tested, please contact Water Technology, Inc. at 888-834-2905. Citrus Park RV Resort can be reached by contacting 239-992-3030; Fax no. 239-992-4130. Information on lead in drinking water, testing methods, and steps you can take to minimize exposure is available at <https://www.epa.gov/safewater/lead>. Citrus Park RV Resort has completed a Lead Service Line Inventory in 2024 and has found all service lines to be of non-lead pipes. For more information on the inventory contact Water Technology, Inc. at 888-834-2905.

- B. Results in the level detected column for radioactive and inorganic contaminants and haloacetic acids and total trihalomethanes are the highest detected level at any sampling point. The result in the level detected column for chloramines is the highest running annual average, computed quarterly, of the monthly averages of all samples collected. The number reported in the 90th percentile result column for lead and copper is the 90th percentile of all samples for the most recent round of sampling. The range of results is the range of individual sample results (lowest to highest) for all monitoring locations as well as Stage 2 Disinfectants and Disinfection By-Products compliance results.

Secondary Contaminants							
Contaminant and Unit of Measurement	Dates of sampling (mo/yr)	MCL Violation Y/N	Highest Result	Range of Results	MCLG	MCL	Likely Source of Contamination
Total Dissolved Solids (ppm)	12/24	Y	538	N/A	N/A	500	Natural occurrence from soil leaching

Synthetic Organic Contaminants including Pesticides and Herbicides							
Contaminant and Unit of Measurement	Dates of sampling (mo/yr)	MCL Violation Y/N	Level Detected	Range of Results	MCLG	MCL	Likely Source of Contamination
Dalapon (ppm)	12/24	N	0.75	N/A	200	200	Runoff from herbicide use

CITRUS PARK RV RESORT PWS ID# 5360048

2020 ANNUAL DRINKING WATER QUALITY REPORT

Este informe continene información muy importante sobre su agua beber. Tradúscalo ó hable con un amigo quien lo entienda bien.

We're pleased to present to you this year's Annual Drinking Water Quality Report. This report is designed to inform you about the quality water and services we deliver 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. We are committed to ensuring the quality of your water. If you have any questions or concerns about the information provided in this report, please feel free to call any of the numbers listed.

WHERE YOUR WATER COMES FROM

The water source for Citrus Park RV Resort is ground water which is withdrawn from two wells in the Lower Tamiami Aquifer, and one Surficial Aquifer. The water is treated by reverse osmosis, aeration, and chloramine to destroy microbes prior to delivery to customers.

HOW WE ENSURE YOUR DRINKING WATER IS SAFE

The Citrus Park RV Resort routinely monitors for contaminants in your drinking water according to Federal and State laws, rules, and regulations. Except where indicated otherwise, this report is based on the results of our monitoring for the period of January 1 to December 31, 2020. The state allows us to monitor for some contaminants less than once per year because the concentrations of these contaminants do not change frequently. Some of our data, though representative, are more than one year old. Data obtained before January 1, 2020 and presented in this report is from the most recent testing done in accordance with laws, rules, and regulations.

ADDITIONAL HEALTH INFORMATION

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 or 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 operations, 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, the EPA prescribes regulations, which limits the amounts of certain contaminants in water provided by public water systems. The Food and Drug Administration (FDA) 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 some 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 Environmental Protection Agency's Safe Drinking Water Hotline at 1-800-426-4791.

FOR CUSTOMERS WITH SPECIAL HEALTH CONCERNS

Some people may be more vulnerable to contaminants in drinking water than the general population. Immunocompromised 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. EPA/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).

HOW TO REACH US

If you have any questions about this report or concerning your water utility, please contact Florida Utility Solutions at 239-435-0951; Fax no. 888-862-0321. Citrus Park RV Resort can be reached by contacting 239-992-3030; Fax no. 239-992-4130. We want our valued customers to be informed about their water utility.

SOURCE WATER ASSESSMENT PLAN

The Florida Department of Environmental Protection (FDEP) performed a Source Water Assessment on our system in 2020 and a search of the data sources indicated no potential sources of contamination near our wells. The assessment results are available on the FDEP Source Water Assessment and Protection Program website at www.dep.state.fl.us/swapp; or they can be obtained from Citrus Park RV Resort.

HOW TO READ THE TABLE

The terms used in the water quality summary table and in other parts of this report are defined below.

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

Initial Distribution System Evaluation (IDSE) – an important part of the Stage 2 Disinfection Byproducts Rule (DBPR). The IDSE is a one-time study conducted by water systems to identify distribution system locations with high concentrations of trihalomethanes (THMs) and haloacetic acids (HAAs). Water systems will use results from the IDSE, in conjunction with their Stage 1 DBPR compliance monitoring data, to select compliance monitoring locations for the Stage 2 DBPR.

Maximum contaminant level or MCL – the highest level of a contaminant that is allowed in drinking water. MCLs are set as close to the MCLGs as feasible using the best available treatment technology.

Maximum contaminant level goal or MCLG – the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs 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.

N/A – not applicable,

ND – means not detected and indicates that the substance was not found by laboratory analysis.

ppm – parts per million or milligrams per liter is one part by weight of analyte to one million parts by weight of the water sample.

ppb – parts per billion or micrograms per liter is one part by weight of analyte to one billion parts by weight of the water sample.

pCi/l – picocuries per liter is a measure of the radioactivity in water

Treatment technique (TT) – a required process intended to reduce the level of a contaminant in drinking water.

**2020 WATER QUALITY SUMMARY
NON-SECONDARY CONTAMINANTS TABLE - PWS ID NO.
5360048**

Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	MCL Violation Y/N	Level Detected ^B	Range of Results	MCLG	MCL	Likely Source of Contamination
Inorganic Contaminants							
Nitrate as nitrogen (ppm)	06/20	N	0.104	N/A	10	10	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.
Nitrite as nitrogen (ppm)	06/20	N	0.030	N/A	1	1	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.
Barium (ppm)	09/18	N	.002	N/A	2	2	Discharge of drilling wastes; discharge from metal refineries; erosion of natural deposits
Fluoride (ppm)	09/18	N	.038	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 0.7ppm
Sodium (ppm)	09/18	N	13.2	N/A	N/A	160	Saltwater intrusion; Leaching from the soil
Disinfectant or Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	MCL or MRDL Violation Y/N	Level Detected ^B	Range of Results	MCLG or MRDLG	MCL or MRDL	Likely Source of Contamination
Stage 1 Disinfectants and Disinfection By-Products							
Chloramines (ppm)	Monthly	N	1.78	0.9-2.1	MRDLG=4.0	MRDL=4.0	Water additive used to control microbes
Stage 2 Disinfectants and Disinfection By-Products							
Haloacetic acids (HAA5) (ppb)	09/20	N	28.4	27.5-28.4	N/A	60	By-product of drinking water disinfection
Total Trihalomethanes-TTHM (ppb)	09/20	N	55.7	51.9-55.7	N/A	80	By-products of drinking water disinfection
Disinfectant or Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	AL Exceeded Y/N	90 th Percentile Result	No. of Sampling Sites Exceeding AL	MCLG or MRDLG	AL (Action Level)	Likely Source of Contamination
Lead and Copper (Tap Water) ^A							
Copper (tap water) (ppm)	08/19	N	.012	N/A	1.3	1.3	Corrosion of household plumbing systems; Erosion of natural deposits; Leaching from wood preservatives
Lead (tap water) (ppb)	08/19	N	1.0	N/A	0	15	Corrosion of household plumbing systems; Erosion of natural deposits.
Contaminant	Dates of sampling (mo/yr)	Violation Y/N	Total # of Positive Samples for the Year	Range of Results	MCLG	MCL	Likely source of contamination
E. Coli (at the ground water source) ^C	1/20-12/20	N	1	N/A	0	0	Human and animal fecal waste

TABLE NOTES:

- A. 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. The Citrus Park water system 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>.
- B. Results in the level detected column for radioactive and inorganic contaminants and haloacetic acids and total trihalomethanes are the highest detected level at any sampling point. The result in the level detected column for chloramines is the highest running annual average, computed quarterly, of the monthly averages of all samples collected. The number reported in the 90th percentile result column for lead and copper is the 90th percentile of all samples for the most recent round of sampling. The range of results is the range of individual sample results (lowest to highest) for all monitoring locations as well as Stage 2 Disinfectants and Disinfection By-Products compliance results.
- C. **Health Effects:** Fecal coliforms and E. coli are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems

CITRUS PARK RV RESORT PWS ID# 5360048

2021 ANNUAL DRINKING WATER QUALITY REPORT

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We're pleased to present to you this year's Annual Drinking Water Quality Report. This report is designed to inform you about the quality water and services we deliver 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. We are committed to ensuring the quality of your water. If you have any questions or concerns about the information provided in this report, please feel free to call any of the numbers listed.

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Some people may be more vulnerable to contaminants in drinking water than the general population. Immuno-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. U.S. Environmental Protection Agency (EPA)/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 (800-426-4791).

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N/A – not applicable,

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pCi/l – picocuries per liter is a measure of the radioactivity in water

Treatment technique (TT) – a required process intended to reduce the level of a contaminant in drinking water.

**2021 WATER QUALITY SUMMARY
NON-SECONDARY CONTAMINANTS TABLE - PWS ID NO.
5360048**

Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	MCL Violation Y/N	Level Detected ^B	Range of Results	MCLG	MCL	Likely Source of Contamination
Inorganic Contaminants							
Nitrate as nitrogen (ppm)	8/21 & 12/21	N	0.197	0.177-0.197	10	10	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.
Nitrite as nitrogen (ppm)	8/21 & 12/21	N	0.163	0.133-0.163	1	1	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.
Barium (ppm)	12/21	N	0.019	N/A	2	2	Discharge of drilling wastes; discharge from metal refineries; erosion of natural deposits
Selenium (ppb)	12/21	N	1.8	N/A	50	50	Discharge from petroleum and metal refineries; erosion of natural deposits; discharge from mines
Sodium (ppm)	12/21	N	61.1	N/A	N/A	160	Saltwater intrusion; Leaching from the soil
Disinfectant or Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	MCL or MRDL Violation Y/N	Level Detected ^B	Range of Results	MCLG or MRDLG	MCL or MRDL	Likely Source of Contamination
Stage 1 Disinfectants and Disinfection By-Products							
Chloramines (ppm)	Monthly	N	1.51	0.7-3.9	MRDLG=4.0	MRDL=4.0	Water additive used to control microbes
Stage 2 Disinfectants and Disinfection By-Products							
Haloacetic acids (HAA5) (ppb)	09/21	N	39.9	39.4-39.9	N/A	60	By-product of drinking water disinfection
Total Trihalomethanes-TTHM (ppb)	09/21	N	36	29.8-36	N/A	80	By-products of drinking water disinfection
Disinfectant or Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	AL Exceeded Y/N	90 th Percentile Result	No. of Sampling Sites Exceeding AL	MCLG or MRDLG	AL (Action Level)	Likely Source of Contamination
Lead and Copper (Tap Water) ^A							
Copper (tap water) (ppm)	08/19	N	0.012	0	1.3	1.3	Corrosion of household plumbing systems; Erosion of natural deposits; Leaching from wood preservatives
Lead (tap water) (ppb)	08/19	N	1.0	0	0	15	Corrosion of household plumbing systems; Erosion of natural deposits.

TABLE NOTES:

A. 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. The Citrus Park water system 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>.

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5360048**

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Inorganic Contaminants							
Nitrate as nitrogen (ppm)	08/21 & 12/22	N	0.08	0.177-0.197	10	10	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.
Nitrite as nitrogen (ppm)	08/21 & 12/22	N	0.0100	0.133-0.163	1	1	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.
Barium (ppm)	12/21	N	0.019	N/A	2	2	Discharge of drilling wastes; discharge from metal refineries; erosion of natural deposits
Selenium (ppb)	12/21	N	1.8	N/A	50	50	Erosion of natural deposits; discharge from fertilizer and aluminum factories. Water additive which promotes strong teeth when at optimum level of 0.7ppm
Sodium (ppm)	12/21	N	61.1	N/A	N/A	160	Saltwater intrusion; Leaching from the soil
Uranium (pCi/L)	12/21	N	2.7	N/A	0	15	Erosion of natural deposits.
Radium-226 (pCi/L)	12/21	N	0.9	N/A	0	0	Erosion of natural deposits.
Radium-228 (pCi/L)	12/21	N	0.8	N/A	0	0	Erosion of natural deposits.
Disinfectant or Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	MCL or MRDL Violation Y/N	Level Detected ^B	Range of Results	MCLG or MRDLG	MCL or MRDL	Likely Source of Contamination
Stage 1 Disinfectants and Disinfection By-Products							
Chloramines (ppm)	Monthly	N	2.36	0.8 - 4.0	MRDLG=4.0	MRDL=4.0	Water additive used to control microbes
Stage 2 Disinfectants and Disinfection By-Products							
Haloacetic acids (HAA5) (ppb)	09/22	N		0.9 – 26.0	N/A	60	By-product of drinking water disinfection
Total Trihalomethanes-TTHM (ppb)	09/22	N		68.0 – 72.0	N/A	80	By-products of drinking water disinfection
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Lead (tap water) (ppb)	09/22	Y	52.8	N/A	0	15	Corrosion of household plumbing systems; Erosion of natural deposits.

Contaminant	Dates of sampling (mo/yr)	Violation Y/N	Total # of Positive Samples for the Year	Range of Results	MCLG	MCL	Likely source of contamination
E. Coli (at the ground water source) ^c	1/23 - 12/23	N	0	N/A	0	0	Human and animal fecal waste

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Nitrite as nitrogen (ppm)	11/23	N	0.11	N/A	1	1	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits.
Barium (ppm)	12/21	N	0.019	N/A	2	2	Discharge of drilling wastes; discharge from metal refineries; erosion of natural deposits
Selenium (ppb)	12/21	N	1.8	N/A	50	50	Erosion of natural deposits; discharge from fertilizer and aluminum factories. Water additive which promotes strong teeth when at optimum level of 0.7ppm
Sodium (ppm)	12/21	N	61.1	N/A	N/A	160	Saltwater intrusion; Leaching from the soil
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Radium-226 (pCi/L)	12/21	N	0.9	N/A	0	0	Erosion of natural deposits.
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Chloramines (ppm)	Monthly	N	1.85	0.5 - 4.4	MRDLG=4.0	MRDL=4.0	Water additive used to control microbes
Stage 2 Disinfectants and Disinfection By-Products							
Haloacetic acids (HAA5) (ppb)	09/23	N	0.009	0.0009-0.009	N/A	60	By-product of drinking water disinfection
Total Trihalomethanes-TTHM (ppb)	09/23	N	0.0005	0.0005-0.0005	N/A	80	By-products of drinking water disinfection
Disinfectant or Contaminant and Unit of Measurement	Dates of sampling (mo./yr.)	AL Exceeded Y/N	90 th Percentile Result	No. of Sampling Sites Exceeding AL	MCLG or MRDLG	AL (Action Level)	Likely Source of Contamination
Lead and Copper (Tap Water) ^A							
Copper (tap water) (ppm)	10/23	N	0.014	N/A	1.3	1.3	Corrosion of household plumbing systems; Erosion of natural deposits; Leaching from wood preservatives
Lead (tap water) (ppb)	10/23	N	0.9	N/A	0	15	Corrosion of household plumbing systems; Erosion of natural deposits.

TABLE NOTES:

- A. 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. The Citrus Park water system 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>.
- B. Results in the level detected column for radioactive and inorganic contaminants and haloacetic acids and total trihalomethanes are the highest detected level at any sampling point. The result in the level detected column for chloramines is the highest running annual average, computed quarterly, of the monthly averages of all samples collected. The number reported in the 90th percentile result column for lead and copper is the 90th percentile of all samples for the most recent round of sampling. The range of results is the range of individual sample results (lowest to highest) for all monitoring locations as well as Stage 2 Disinfectants and Disinfection By-Products compliance results.