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February 17, 2005

Blanca S. Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Docket No. 010503-WU

Dear Ms. Bayo:

Enclosed for filing, on behalf of the Petitioners, are the original and 15 copies of the Rebuttal Testimony of Dr. V. Abraham Kurien in Docket No. 010503-WU.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

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Sincerely,

Charles Bock

Charles J. Beck Deputy Public Counsel

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

1		BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
2		ALOHA UTILITIES, INC.
3		DOCKET NO 010503-WU
4		
5		REBUTTAL TESTIMONY
6		OF
7		V. ABRAHAM KURIEN, M.D.
8		
9	IN	RESPONSE TO TESTIMONIALS BY DR. AUDREY D. LEVINE PH.D
10		AND MR. DAVID W. PORTER. P.E.
11		
12		
13	Q.	COULD YOU PLEASE EXPLAIN WHY YOU DECIDED TO
14		INTERVENE AND FILE DIRECT TESTIMONY IN THIS
15		PROCEEDING?
16		
17	A.	As someone who experienced poor quality of water in his domestic plumbing,
18		I was forced to take upon myself the burden of attempting to find ways of
19		getting Aloha Utility involved in addressing whether its processing methods
20		were adequate to create a product such that its quality did not deteriorate
21		within domestic plumbing under reasonable and nationally recognized
22		conditions of material structure and appropriateness of daily use of water. As
23		part of my effort, I unearthed a great deal of evidence that was not previously

1		available to the customers or was unknown to regulatory agencies. While
2		doing so, I discovered that the reasons for the poor quality of water in the
3		domestic plumbing of some areas of Aloha's territory was not adequately
4		investigated and appropriate interventions had not been instituted to improve
5		the quality of water for over ten years after being brought to the attention of
6		regulatory agencies.
7		
8	Q.	COULD YOU PLEASE INDICATE WHETHER YOU HAVE ANY
9		EDUCATIONAL BACKGROUND OR EXPERIENCE THAT
10		ENABLES YOU TO ADDRESS THIS ISSUE AND WHICH MAY
11		CONTRIBUTE TO THE RESOLUTION OF THE PROBLEMS?
12		
13	A.	First of all, I like to indicate that I have no educational background in
14		engineering of any kind, and specifically in water engineering.
15		However, the aspects that I have chosen to comment about in this proceeding
16		relate to fields of my educational background, namely chemistry, bacteriology
17		and "circulation". I received a cum laude Batchelor of Science degree in
18		chemistry from the University of Mysore in India in 1954 and taught
19		analytical chemistry at college level. This involved identifying unknown
20		substances through analytical methods. I received a Summa Cum Laude
21		M.D. degree from the University of Edinburgh in Scotland in 1963 and
22		graduated as the most distinguished graduate of the year and was awarded the
23		Gold Medal for Medicine. A major part of medical training consists of the

1		understanding of bacteriology and therapeutics. I have undertaken
2		postgraduate research into human circulation and am a Fellow of the Royal
3		College of Physicians of Edinburgh and was an Assistant Professor at the
4		University of Edinburgh between 1968-1970. I practiced Internal Medicine
5		and Cardiology for twenty years in Connecticut and was on the Staff of the
6		University of Connecticut as a Clinical Instructor. Thus I have a sound
7		background and training in the methods of scientific investigation, the
8		principles of diagnosis and treatment. I have published many articles in
9		various peer-reviewed journals.
10		
11	Q.	CAN YOU NOW SPECIFICALLY ADDRESS TESTIMONY
12		PROVIDED BY DR. AUDREY LEVINE AND MR. DAVID PORTER IN
13		RESPONSE TO YOUR TESTIMONY IN DOCKET NO 010503-WU
14		WITH REFERENCE TO THE STANDARDS AND THE POINTS AT
15		WHICH THOSE STANDARDS MUST BE COMPLIED WITH TO
16		IMPROVE THE QUALITY OF WATER IN THE DOMESTIC
17		PLUMBING OF CUSTOMERS IN ALOHA'S TERRITORY?
18		
19	А.	I must first address the reason why I requested modification of Aloha's re-
19 20	А.	I must first address the reason why I requested modification of Aloha's re- wording of the Tampa Bay Water Authority ("TBWA") standard.
	Α.	
20	Α.	

1	documented for many years. No specific factors or combination of factors
2	have so far been identified as responsible for these phenomena. There have
3	been two hypotheses that have been advanced to account for these findings.
4	Mr. Porter, the consultant engineer of Aloha, elaborated on the first hypothesis
5	in his testimonial before the Public Service Commission in 1996 when he
6	claimed that the only reason for the phenomenon of intermittent black water
7	was the re-formation of hydrogen sulfide in situ and de novo in the domestic
8	plumbing due to the action of sulfur reducing bacteria (SRB) on sulfate
9	naturally present in the underground water. The re-generation of corrosive
10	hydrogen sulfide in domestic plumbing was explained as being due to the
11	removal of chlorine by water softeners and conditioners installed by
12	customers in their homes, thereby reducing the disinfection capability of
13	delivered water. Aloha Utilities has consistently maintained that the water it
14	delivers at the domestic meter is "clean, clear and safe" and therefore it has no
15	responsibility for what happens in domestic plumbing and finds no need to
16	alter its method of processing in such a way as to provide greater stability for
17	water in domestic plumbing. This set of reasoning is only a hypothesis, since
18	Aloha has not demonstrated re-generation of hydrogen sulfide from sulfate as
19	the primary reason for copper corrosion and rotten egg smell in its service
20	territory. PSC staff has documented that black water does occur even in
21	homes that have no water softeners or conditioners of any kind.

1	A second hypothesis can be inferred from research literature in which the
2	effect of the sole use of chlorination for processing water has been studied,
3	and from FDEP guidelines that have been proposed after extensive discussion
4	among experts in the field of water processing for the prevention of copper
5	corrosion and black water formation in domestic plumbing. Stated simply,
6	this hypothesis maintains that the sole use of chlorination for processing
7	source water that contains hydrogen sulfide above a certain level will result in
8	turbidity caused by elemental sulfur formed during the process and that the
9	amount of turbidity formed is proportional to the amount of hydrogen sulfide
10	present in water, among other factors. This turbidity may be associated with
11	formation of black water due to the production of copper sulfide in domestic
12	plumbing containing copper. Both Mr. Porter and Dr. Levine, the university
13	consultant of Aloha for the implementation of a new processing method, have
14	observed that this association may be related "to increased chance for
15	bacterial contamination" and "the lowering of the effectiveness of
16	disinfection". Over a year ago, FDEP instituted new guidelines for removal
17	of elemental sulfur when chlorination alone is used for processing source
18	water that contains more than 0.3mg/l of hydrogen sulfide.
19	
20	I indicated in my direct testimonial that the audit conducted by Dr. Levine
21	documented the presence of hydrogen sulfide in the transmission system of
22	Aloha contrary to the claim of Mr. Porter previously that there was no
23	hydrogen sulfide in the transmission and distribution system of the Utility.

1	Dr. Levine has addressed this matter in her testimonial by saying, "the only
2	location in which detectable hydrogen sulfide was observed was at the inflow
3	to the ground storage tank which is not in the " <u>transmission</u> " or distribution
4	system" (page 3, lines 5-7). Mr. Porter has addressed the same finding by
5	saying, "A slight hydrogen sulfide concentration (of 0.12mg/l) was found in
6	the <i>partially</i> treated water flowing in a pipeline connecting two treatment
7	plants with the main ground storage tank. This water does not flow into the
8	distribution system" (page 8, line 22- page 9, line 1). Both of them have
9	concluded that I was mistaken in maintaining that hydrogen sulfide was
10	detected at a level of 0.12mg/l in Aloha's "transmission" system.
11	
12	The accuracy of my statement depends on how one defines transmission and
13	distribution system. "Transmission system" is the system of pipes that
14	transmits water from the wells to the storage tank. "Distribution system" is
15	the system of pipes that distributes water from the wells or the storage tank to
16	the customers.
17	
18	The water in which hydrogen sulfide was detected above the 0.1mg/l level
19	suggested as a standard had <u>already been processed</u> at the wells with the <u>sole</u>
20	use of chlorination and was recorded to have only 0.01 mg/l of hydrogen
21	sulfide when it was delivered into the "transmission" system. Further down in
22	its travel in the "transmission" system a water sample was taken and found to
23	have 0.12 mg/l of hydrogen sulfide. There are only two possible conclusions

1	as to why this happened. Mr. Porter prefers the explanation that the water was
2	only "partially treated" at the wells and needed "final treatment" and the
3	latter was undertaken at the storage tank and that the water in the outflow
4	from the storage tank the same day contained no hydrogen sulfide when it was
5	pumped into the "distribution system". Dr. Levine's explanation implies that
6	this was an isolated finding. "This sample site was re-sampled several times
7	in succession and did not have detectable hydrogen sulfide upon re-
8	sampling" (page 3, lines 7-11). Both Dr. Levine and Mr. Porter were on this
9	sampling tour along with Dr. John Gaul PhD, customer representative, but I
10	was not. Therefore, I cannot verify the accuracy of that statement. However,
11	the disparate explanation by the two testimonials in response to my reference
12	to the audit report's conclusion raises serious concern as to what might be the
13	real explanation.
14	
15	The detection in the "transmission system" of Aloha Utilities of hydrogen
16	sulfide above the level recommended as a standard is of serious concern to the
17	customers. My education in chemistry taught me that science is no
18	respecter of persons or locations. Where conditions are suitable,
19	reactions take place! If significant concentration of hydrogen sulfide was
20	found in one location of Aloha's system after the water left the treatment plant
21	at a well, then the same event could occur at other sites in the "transmission"
22	and "distribution" system into which finished water is introduced after using
23	the same processing method. Whether the hydrogen sulfide detected was

1 present due to re-formation as I suggested in my testimonial or due to "partial treatment" of hydrogen sulfide in source water as Mr. Porter suggests in his 2 3 testimonial, the concern is that the method of treatment at the well is either inadequate to completely remove hydrogen sulfide from raw water 4 5 or that the processing method used is easily reversible during the 6 transport of water in Aloha's system from one location to another. This raises the serious possibility that hydrogen sulfide may intermittently be 7 8 delivered into the domestic plumbing and thereby cause corrosion. I realize 9 that this is a hypothesis contrary to accepted "wisdom", but it is a testable 10 hypothesis. Customers have reported black water in the pipes between the domestic meter and before delivered water enters their homes. This is well 11 12 before any water softener or conditioner systems and therefore does not 13 conform to Mr. Porter's complaints about such installations being responsible for re-formation of hydrogen sulfide in water the Utility has previously 14 15 claimed was **adequately** treated. Now for the first time, Mr. Porter is 16 admitting, what he must have known all along, that source water is only partially treated at first pass at the wells and requires further treatment! In 17 reports submitted by Aloha's own technical staff during flushing procedures 18 carried out by them, there is documented evidence of black and discolored 19 20 water in Aloha's distribution system even when fire hydrants are flushed on a 21 daily basis and large volumes of finished water were removed from the 22 distribution system to raise free chlorine residual levels to 1.5 mgs/l (Exhibit 23 VAK-19). These documents provide corroboration that finished water is not

1	adequately treated before discharge into the distribution system or that the
2	processing method is easily reversible. Dr. Levine's proposal that there is no
3	significance to an isolated finding is also not very valid, because when the
4	degradation of water quality is intermittent, one does not expect to find
5	evidence for it all the time!
6	
7	Most of the water that Aloha supplies to its customers flows <u>directly</u> from
8	wells to domestic plumbing without receiving a second "final treatment
9	prior to its being pumped into the distribution system" (Mr. Porter; page 9,
10	line 1). Such re-treatment is provided only when water is distributed from the
11	storage tank. If a chlorine booster is necessary to treat water further in the
12	ground storage tank (which has no water softener or water conditioner) before
13	the water left the same day to travel along the distribution system to the
14	customers, it would suggest that the chlorine decay in Aloha water is much
15	higher than documented by monthly operation reports (MOR) submitted to the
16	FDEP. What is responsible for this phenomenon? What impact does this
17	have when most of the water supplied to homes goes directly from wells to
18	domestic plumbing without a second final treatment? Are the levels in the
19	MOR submitted to FDEP truly the lowest free chlorine residual in the
20	distribution system or were most of the readings obtained from samples taken
21	after the flushing procedure that raises free chlorine residuals?

.

1		It is this concern that prompted me to suggest that the total sulfide standard of
2		0.1mg/l should be complied with at the domestic meter to ensure that the
3		water that enters the domestic plumbing does not have more total sulfides
4		because such presence could cause significant copper corrosion.
5		
6	Q.	HOW DO YOU ANSWER THE TESTIMONIAL THAT THERE IS NO
7		NEED TO MEASURE ELEMENTAL SULFUR LEVELS OR HAVE A
8		STANDARD FOR ELEMENTAL SULFUR IN ADDITION TO THE
9		STANDARD FOR HYDROGEN SULFIDE BECAUSE ACCORDING
10		TO DR. LEVINE "THERE HAS BEEN NO VIOLATION OF THE
11		BACTERIOLOGICAL STANDARD (TOTAL COLIFORM) WITHIN
12		THE SEVEN SPRINGS SYSTEM" (PAGE 3, LINES 21-23)? "
13		
14	A.	As I indicated earlier, in their prior statements referred to in my direct
15		testimony both Dr. Levine and Mr. Porter have suggested a role for turbidity
16		induced by colloidal elemental sulfur in lowering bacterial disinfection
17		capabilities. Both <i>now</i> argue that there is no factual evidence of lowered
18		disinfection capability as demonstrated by the lack of high coliform colony
19		(Dr. Levine; page 3, lines 21-23) and heterotrophic plate colony counts (Mr.
20		Porter; page 9, line 22-24). It is also pointed out that the reported levels of
21		free chlorine residuals in MOR submissions to FDEP show levels above 0.2
22		mg/l, the minimum required for human pathogens according to EPA
23		requirements.

1	From the information that I have gathered from Aloha's own flushing
2	program reports, there is evidence that free chlorine residuals have fallen
3	below 0.2mg/l at a number of sites in Aloha's distribution system even when
4	flushing is undertaken on a daily basis and that there has been discoloration of
5	water in the distribution system on many days (Exhibit VAK-19). PSC Staff
6	has documented black water in homes that have no water conditioner systems
7	and should have adequate chlorine levels during periods of daily use, if such
8	were present when water was delivered. Aloha has not provided any evidence
9	to suggest that SRB, the bacteria considered responsible for the <i>in situ</i> and <i>de</i>
10	novo regeneration of hydrogen sulfide in domestic plumbing, can be
11	inactivated by the 0.2mg/l level of free chlorine residual. SRB is an
12	anaerobic organism and its sensitivity to chlorine may well be different from
13	that of human pathogens. Anaerobic organisms are more effectively
14	inactivated by the presence of oxygen in the medium in which they live, as
15	those who understand bacteriology know, and as indicated by Dr. Levine in
16	her audit recommendations. Since the underground water that Aloha
17	processes contains very little oxygen, it is likely that this organism is capable
18	of being active even in "finished" Aloha water at all levels of its system,
19	including the domestic plumbing The evidence that exists in a study done
20	by FDEP, "The Pasco County Black Water Study" performed by FDEP in
21	1998-9 (Exhibit VAK-20) showed significant growth of bacteria, I presume
22	SRB, from 10-30 % of delivered water at the point of its entry to the domestic
23	plumbing. The most likely manner in which SRB is delivered into the

1		closed system of the domestic plumbing is by its entry through the
2		delivered water. The lower incidence of black water and rotten egg smell in
3		aerated water systems may well be related to the reality that in aerated water,
4		this bacterium is inactive.
5		
6		Therefore, from the point of view of corrosiveness of metals the evidence
7		suggesting the absence of human pathogens such as coliform bacteria or
8		maintenance of adequate chlorine levels at FDEP standard of 0.2mg/l may not
9		be adequate to exclude introduction of active SRB from the wells of Aloha
10		into the domestic system. Aeration may be necessary to inactivate this
11		organism.
12		
13	Q.	MR. PORTER STATES, "DR. LEVINE CONDUCTED SUSPENDED
14		SOLIDS TESTING OF THE WATER SAMPLED FROM A NUMBER
15		OF CUSTOMER METERS DURING HER WORK. IN EACH CASE,
16		NO MEASURABLE QUANTITY OF SUSPENDED SOLIDS WAS
17		FOUND". DOES THAT NOT SUGGEST THAT THE LEVELS OF
18		ELEMENTAL SULFUR ARE VERY LOW?
19		
20	A.	The levels of suspended solids and their composition in a water processing
21		system obviously are very variable according to Dr. Levine's testimonial
22		(page 5, lines 3-4). These were semi-quantitatively tested for at the wells, not
23		at other levels of Aloha's systems or in the domestic plumbing, as Mr. Porter

1	seems to suggest. Dr. Levine in fact demonstrated minute quantities of
2	elemental sulfur by the use of scanning electron micrographs (SEM) at Well 8
3	and significant amount of suspended solids when customers' whole house
4	filters and water from hot water systems were tested (Exhibit VAK-21, Dr
5	Levine's Phase II audit report pages 27-32). From the examination of
6	installed whole house sediment filters, customers have reported wide variety
7	of suspended solids in the water they receive from Aloha including sand,
8	debris of other kinds and varying concentration of black material even before
9	delivered water enters their homes (Exhibit VAK-22). The only suspended
10	material we need to consider as an antecedent to metal corrosion, on the basis
11	of hypotheses that have been advanced, is elemental sulfur. The amount of
12	elemental sulfur produced in finished water is a function of the concentration
13	of hydrogen sulfide in raw water and the amount of chlorine added, in
14	addition to factors such as oxygen level in raw water and pH. At the pH of
15	Aloha's source water, and with no oxygen present, it seems very likely that
16	elemental sulfur is formed when the sole use of chlorination is the processing
17	method and the ratio between hydrogen sulfide level and chlorine added is
18	insufficient.
19	

As Dr. Levine has pointed out, I concede that at the present moment, there is no accurate method to measure the levels of elemental sulfur in delivered water. However, scanning electron micrographs (SEM) can indicate the presence of sulfur particles and other aggregates consisting of sulfur,

- phosphorus and many different metal elements at different stages of the water processing system and the domestic plumbing.
- 2 3

4 Dr. Levine spent enormous amounts of effort to do exactly that in processed 5 water from Well 8 and other areas in the transmission system and domestic 6 plumbing, (Exhibit VAK-21). On 10/29/03 when Well 8 was sampled, the 7 hydrogen sulfide level in source water was 2.20 mg/l. On November 12, 2003 8 hydrogen sulfide level was 1.73 mg/l. Both these levels of hydrogen sulfide 9 in source water are within the theoretical capacity of the chlorinator at that 10well to completely convert to sulfate without the production of elemental 11 sulfur. Dr. Levine calculated the specific chlorine demand of hydrogen 12 sulfide in Well 8 on November 12, 2003 as 7.83mg/l. This suggests that the 13 oxidation reaction of hydrogen sulfide in that well on that day had proceeded 14 almost completely to sulfate. Theoretical value for chlorine demand of 15 hydrogen sulfide for complete conversion from sulfide to sulfate is 8.33mg/l. 16 (Exhibit VAK-23). Therefore, one would not have expected to see much 17 colloidal elemental sulfur in finished water from that well on that day. 18 However, the question that needs answering is: What happens when the 19 amount of hydrogen sulfide in raw water exceeds the theoretical capacity of 20 the amount of chlorine added or the maximum capacity of the chlorinator at 21 any well to convert hydrogen sulfide to sulfate? The maximum theoretical 22 capacity for conversion of hydrogen sulfide to sulfate at Well 9 is only 2.6 mgs/l according to Dr. Levine. (Exhibit VAK-24). On 11/12/03 the amount 23

1	of hydrogen sulfide present in raw water from Well 9 was only 2.43mg/l
2	within the capacity of the chlorinator at that well. So on that day only
3	minimal elemental sulfur would have been formed. However, would it have
4	been possible for the chlorinator at Well 9 to prevent formation of elemental
5	sulfur (in greater quantity than was demonstrated in Well 8 on $11/12/03$) when
6	the level of hydrogen sulfide was 3.95 mg/l in Well 9 on 10/29/03 and the
7	maximum theoretical capacity of the chlorinator at that well to convert to
8	sulfate was only 2.6mg/l? What might have happened during the 3 months
9	of April –July in 2001, when the raw water in Well 9 was documented to
10	have hydrogen sulfide levels between 3.5 –6.71 mg/l on twenty different
11	occasions? (Dr Levine's Phase I Report, page 10, Exhibit VAK-25) It does
12	not seem unreasonable to conclude that theoretically during that season in
13	2001, there may have been 1-3 mgs/l of elemental sulfur in water processed
14	from Well 9. If so, what is the implication of this for the production of black
15	water and rotten egg smell in domestic plumbing served by water from that
16	well if elemental sulfur is associated with black water? Scanning electron
17	microphotographs provided by Dr. Levine in the Phase II Report show
18	increasing quantities of suspended solids as water moves through Aloha's
19	system from well to storage tank and finally reaches domestic plumbing after
20	the domestic meter. Greater amount of suspended solids was demonstrated in
21	the hot water system. (Exhibit VAK-21).

*

1		Production of SEM to detect presence of elemental sulfur in processed water
2		is not an economically viable proposition and in any case it is not a
3		quantitative method. Turbidity increase in finished water after processing has
4		been suggested as a simpler method. Turbidity measurements were not
5		carried out during the sampling of water from any of Aloha's eight wells
6		during Dr. Levine's audit nor were SEM made of water from <u>Well 9</u> on
7		10/29/03 when hydrogen sulfide level was 3.95mg/l and beyond the
8		capacity of the chlorinator to convert completely to sulfate. That would
9		have been more relevant than producing scanning electron micrographs of
10		particulate matter from Well 8 where the likelihood of elemental sulfur
11		production was low on the day the water was sampled.
12		
13	Q.	YOU HAVE NOT ANSWERED THE CONCERNS RAISED BY MR.
14		PORTER THAT YOU ARE ASKING FOR STANDARDS THAT ARE
15		DIFFICULT AND EXPENSIVE TO ACHIEVE AND ARE NOT USED
16		"ANYWHERE IN THIS NATION, PERHAPS IN THE WORLD"
17		(PAGE 6, LINES 21-23).
18		
19	A.	I must agree that this observation may indeed be correct! However, scientific
20		methodology also requires stringent standards to achieve therapeutic goals
21		especially when there is no track record for a new method. The method that
22		Aloha plans to adopt is not being used anywhere in this nation for oxidizing

1	hydrogen sulfide in source water to produce drinkable water. Perhaps, for
2	that matter it is not used any where in the world!
3	
4	When I used the words "standard" and "MCL", I was using the terminology
5	the way it is used almost interchangeably in Exhibit D of the TBWA such as
6	maximum contaminant level, goal, standard, compliance level and action
7	level. (Exhibit VAK-26) The important point is that TBWA requires
8	action if the level of total sulfides exceeds 0.1mg/l and that action is to be
9	taken by the TBWA and its member governments that are utilities and
10	not allow customers to suffer the consequences that may arise. It has been
11	demonstrated by a number of utilities that black water and rotten egg smell
12	can be significantly reduced by methodologies without strict measurement and
13	conformity with standards for total sulfide and elemental sulfur levels, such as
14	membrane technologies (Dunedin Municipal Utility) and aeration and
15	biological oxidation (Pasco County Utility), manganese green sand and
16	potassium permanganate oxidation (Port Richey Utility) along with more
17	appropriate adjustment of pH levels. These methods obviously address the
18	issues of black water and rotten egg smell through other effective
19	interventions. Aloha does not use any of these methods now and did turn
20	down the suggestion of increasing the pH of delivered water.
21	
22	The new processing method using hydrogen peroxide that is being considered
23	by Aloha utility as well as the current processing method of the sole use of

1	chlorination are reversible oxidative methods that can result in re-formation
2	of hydrogen sulfide and the production of elemental sulfur. In the absence of
3	the use of more successful methods for reducing copper corrosion, strict
4	adherence to more stringent standards that lower the levels of these substances
5	that have been considered to be significant factors in the production of black
6	water and rotten-egg smell are necessary to improve water quality in certain
7	areas of Aloha's territory. <u>The directive given by the PSC to the Utility in</u>
8	April, 2002, was to implement a method that ensures a significant reduction of
9	black water and rotten egg smell in domestic plumbing.
10	
11	An essential approach to remediation in any system whether it is a material
11 12	An essential approach to remediation in any system whether it is a material system or a living system requires that the correct diagnosis and causative
12	system or a living system requires that the correct diagnosis and causative
12 13	system or a living system requires that the correct diagnosis and causative agency should be established before a therapeutic strategy is recommended. If
12 13 14	system or a living system requires that the correct diagnosis and causative agency should be established before a therapeutic strategy is recommended. If a "therapeutic trial" is being undertaken without an accurate diagnosis, (as
12 13 14 15	system or a living system requires that the correct diagnosis and causative agency should be established before a therapeutic strategy is recommended. If a "therapeutic trial" is being undertaken without an accurate diagnosis, (as Aloha is attempting to do at this time), it is important to establish that the
12 13 14 15 16	system or a living system requires that the correct diagnosis and causative agency should be established before a therapeutic strategy is recommended. If a "therapeutic trial" is being undertaken without an accurate diagnosis, (as Aloha is attempting to do at this time), it is important to establish that the levels of incriminated factors such as hydrogen sulfide, elemental sulfur and
12 13 14 15 16 17	system or a living system requires that the correct diagnosis and causative agency should be established before a therapeutic strategy is recommended. If a "therapeutic trial" is being undertaken without an accurate diagnosis, (as Aloha is attempting to do at this time), it is important to establish that the levels of incriminated factors such as hydrogen sulfide, elemental sulfur and presence of SRB are adequately monitored and controlled, especially where
12 13 14 15 16 17 18	system or a living system requires that the correct diagnosis and causative agency should be established before a therapeutic strategy is recommended. If a "therapeutic trial" is being undertaken without an accurate diagnosis, (as Aloha is attempting to do at this time), it is important to establish that the levels of incriminated factors such as hydrogen sulfide, elemental sulfur and presence of SRB are adequately monitored and controlled, especially where the history of poor water quality is of long standing without effective

.

21 Q. DO YOU HAVE ANY ADDITIONAL COMMENTS?

1	A. Yes. Mr. Porter has stated very categorically that I am mistaken in a number
2	of my statements (page 10, lines 14-18). I am always willing to be corrected about
3	inaccurate statements, and would do so in this instance also if the shifting claims of
4	Mr. Porter were true. Much has been made of the succinct, but important distinction
5	that I made between the Tampa Bay Water Standard (goal) in exhibit D and the re-
6	wording that Aloha has used for modification of the "98% hydrogen sulfide removal"
7	standard. As I indicated in my direct testimony, Exhibit D makes no mention of
8	treatment facilities at all, but indicates that the "water quality parameter" will be
9	"sampled annually at a minimum at the Point(s) of Connection". Further down in
10	Exhibit D on page 3, (Exhibit VAK-26), the Notes section says, "maximum average=
11	not to exceed average value using a running four quarterly sample average". To me
12	this represents the way TBWA arrives at the compliance level determination for
13	itself. I assumed, correctly I maintain, that this means TBWA samples processed
14	water at least four times at its treatment facilities to establish that it has complied
15	with its own standard (goal). In fact Mr. Porter himself admitted this to be accurate in
16	a document submitted by Aloha's attorney, Mr. Deterding, on March 29, 2004 to the
17	PSC (Exhibit VAK-27). Testing was recommended at a minimum of annually only at
18	the point(s) of connection. The responsibility, if desired or necessary, to sample more
19	frequently at the points of connection was left to the member government utilities.
20	Aloha is requesting that the standard be reduced to an <u>annual</u> sampling at the
21	treatment facility and claiming that such a frequency to be the norm at the
22	TBWA. That is patently incorrect.

1	Aloha Utilities wants to be left alone to produce potable water that does not remain
2	drinkable in customer plumbing by the claim on the one hand that according to
3	Florida Statutes its responsibility ends at the outflow of the domestic meter. Yet
4	when it comes to ensuring that the water it delivers to the customers meets the TBWA
5	performance standard (compliance level, action level, goal) which the Utility claims it
6	is ready to meet, it no longer wants to do so at the domestic meter which is the point
7	of delivery, but only at the treatment facility and only once a year. No other product
8	can be sold in this country by the claim that it met standards at the production plant as
9	automobile, home appliance and electronic product manufacturers know only too
10	well. They have to meet standards at the point of delivery. There may not be a law
11	so far that potable water should meet standards at the point of delivery, but no
12	customer should have to put up with stinking black water for ten years with a claim
13	from its producers that its water is "clean, clear and safe" at the point of delivery,
14	without tests confirming that it has the ability to remain so.
15	
16	As a last statement, I want to indicate that I do understand very clearly the
17	limits of my knowledge. I have based everything that I have stated in my
18	testimonials on public and Aloha's records and statements by experts
19	including Dr. Levine and Mr. Porter. As a person committed to scientific
20	methodology, I maintain that there is a difference between a hypothesis and
21	documented facts and that this differentiation must <u>always</u> be maintained. My
22	interpretations of the data may be different from "accepted wisdom", but that
23	is what scientific judgment and dialogue are all about. My scientific

1	knowledge base is solid and I do not venture out beyond my knowledge base
2	to make inappropriate categorical statements about the cause of black water
3	but merely request those who have regulatory responsibilities, to consider the
4	totality of circumstantial evidence in a new way. The claim that the black
5	residue seen in the toilet tanks of customers is the result of the corrosion of
6	black flotation ball, as Mr. Porter told me when he visited my house in
7	January, 2002 and that black water would disappear from customers' toilet
8	tanks if black flapper valves were replaced by red valves, as Mr. Crouch
9	another engineer of Aloha suggested at an Aloha Customer Workshop in June,
10	2004, came from consultants who have water engineering degrees and who
11	were introduced at customer workshops as experts. Such nonscientific and
12	absurd statements offered as facts were used for a long time and is still being
13	used to prevent an adequate scientific investigation of black water and rotten
14	egg smell in customers' plumbing.
15	
16	Scientific investigations and appropriate therapeutic interventions by
17	professionals who <u>have no conflict of interest</u> are always necessary to
18	solve complex problems of water quality. It is very appropriate for
19	regulatory agencies to <u>always</u> insist on expert consultations free of
20	conflict-of-interest from extramural water processing professionals and
21	engineers, especially when offers at good faith negotiations with utilities
22	to solve issues have been rejected.

1 Q. WHAT IS YOUR SPECIFIC RECOMMENDATION TO THE

2

COMMISSION IN THIS PROCEEDING?

3

4 A. I have presented enough evidence based on objective facts and data gathered 5 from numerous sources that stringent standards are essential for Aloha's 6 current method and the proposed new method to deliver water that will 7 significantly reduce the incidence of black water and rotten egg smell in 8 domestic plumbing. If Aloha is not willing to accept these logical standards. 9 the Utility should be prepared to implement other well-recognized methods 10 that even without the use of these strict standards have been associated with 11 much lower incidence of these phenomena and have a well established track 12 record of being able to deliver water that remains stable in domestic plumbing 13 without a high incidence of black water and rotten-egg smell. Where such 14 phenomena occur, and where Aloha has not provided remediation for ten 15 years, the customers are now requesting the PSC to provide them with an 16 opportunity to get better quality water by deletion of those territories from 17 Aloha's service area.

3 A. Yes, thank you.

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1 Q. IS THAT THE END OF YOUR REBUTTAL TESTIMONY?

INDEX OF EXHIBITS

REBUTTAL TESTIMONY-V. ABRAHAM KURIEN

DOCKET NO. 010503-WU

EXHIBIT NAME

EXH. NO.

ALOHA'S OWN RECORDS OF FLUSHING REPORTS IN THE YEAR 1999 WITH AN ANALYIS OF THE FINDINGS BY DR. KURIEN	VAK-19	
THE PASCO COUNTY BLACK WATER STUDY, SUBMITTED BY VAN HOOFNAGL AUGUST 9, 1999 AND AN ANALYSIS OF THE FINDINGS BY DR. KURIEN	Е, VAK-20	
PHASE II AUDIT REPORT BY DR. LEVINE, PAGES 27-32	VAK-21	
SCANNING ELECTRON MICROGRAPH, FIGURES 31, PHASE II REPORT	VAK-22	
PHASE II REPORT, PAGE 20, FIGURE 14b; CALCULATIONS	VAK-23	
PHASE I REPORT, PAGE 20	VAK-24	
PHASE I REPORT, PAGE 10	VAK-25	
TAMPA BAY WATER EXHIBIT D, ACTION LEVEL NOTES	VAK-26	
DOCKET NO. 020896-WS, PSC LETTER DATED MARCH 29, 2004 STAFF DATA REQUEST DATA SUBMISSION BY ALOHA UTILITIES, INC.	VAK-27	

DOCKET NO. 010503-WU CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.

Mail or hand-delivery to the following parties on this 17th day of February, 2005.

Charles J. Beck

Rosanne Gervasi, Esquire Division of Legal Services Fla. Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Mr. Harry Hawcrof 1612 Boswell Avenue New Port Richey, FL 34655

Edward O. Wood 1043 Daleside Lane New Port Richey, FL 34655

Aloha Utilities, Inc. Mr. Stephen G. Watford 6915 Perrine Ranch Road New Port Richey, FL 34655-3904

Wayne T. Forehand, Chairman Citizens' Advisory Committee 1216 Arlinbrook drive Trinity, FL 34655-4556

Ann Winkler Riverside Village Estates, Unit 4 4417 Harney Court New Port Richey, FL 34655 F. Marshall Deterding, EsquireJohn Wharton, EsquireRose, Sundstrom and Bentley, LLP2548 Blairstone Pines DriveTallahassee, FL 32301

V. Abraham Kurien, M.D. 7726 Hampton Hills Loop New Port Richey, FL 34654

Senator Mike Fasano 8217 Massachusetts Avenue New Port Richey, FL 34653

John H. Gaul, Ph.D. 7633 Albacore Drive New Port Richey, FL 34655

James Mitchell, Jr. Riviera Home Owners Association 5957 Riviera Lane New Port Richey, FL 34655

John Parese Riverside Villas 4029 Casa del Sol Way New Port Richey, FL 34655

EXHIBILZ

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REVIEW OF DATA ON FLUSHING IN ALOHA UTILITIES' SERVICE TERRITORY

DATA OBTAINED FROM ALOHA

Analysis by V. Abraham Kurien, M.D.

Data for 1999, 2000 and 2003 and 2004 were requested. Due to the enormity of data that had to be analyzed, I have concentrated on one year.

DETAILED REVIEW OF DATA FROM 1999

FINDINGS:

Flushing was conducted on a rotational basis, some areas being scheduled for flushing daily, others for three days a week, yet others for twice a week and a rare area only once a week.

During the year 1999 there was no flushing undertaken over weekends.

Data between May 17 and June 2, 1999 were not submitted: My concern is whether flushing was not undertaken during this 2 week period or whether the data was not submitted for other reasons

Between June and December 1999, discoloration of water was noted on a number of occasions: Colors ranged from black, yellow, brown, rusty and milky (M). Odor was also noted along with discoloration on one occasion.

It is noted that in areas where flushing was scheduled to be done daily, often such flushing was not undertaken regularly (at least there is no documentation that such was undertaken)

Even when flushing was done daily and free chlorine residuals brought up to 1.5 mg/l (which seems to have been the goal), often within 24 hours, the level of free chlorine had been fallen below 0.2 mg/l (minimum required by FDEP regulations) and on a number of occasions was **ZERO**.

The Report on 11/9/99 (Tuesday) reads:

Yellowish water from hydrant: flushed 20 minutes per Tony. Did not clear. Advised by Tony to go to bib at well. Water still yellowish w/small particles in water. Same at all hydrants. Tony said to check Friday (three days later) for next schedule to see if still discolored" Reports show that yellow discoloration was noted at a number of hydrants on 11/10 Wednesday to Thursday, Friday, the following Monday, Tuesday, Wednesday and 11/17 Thursday. On 11/18/99 Friday, the water was noted to be yellow and milky. No abnormal color was noted 1/22-24: No records were found between 11/25-11/28 (presumably long weekend of Thanksgiving).

On 11/29 yellow color was noted again at a number of flushing locations including one at which there was an odor: yellow color on 12/1: on 12/2 color noted as Y(ellow) – A (air) (?reformation of hydrogen sulfide): on 12/6 water noted as brown at one flushing point and rusty at another point.

SUMMARY:

1. Even though there is a program for flushing on a predetermined schedule, such is often not carried out.

2. Even when flushing was carried out per schedule, often there was discoloration of water: The following colors were noted – black, yellow, brown, rusty and milky. Gas (unclear what it was noted and described as air): odor was noted in association with discoloration once.

3. The aim of flushing seems to have been to raise free chlorine residual to 1.5 mg/l of water. Even when flushing was carried out per schedule, often the free chlorine level before flushing was below the 0.2mg/l, the minimum required by FDEP. On a number of occasions the free chlorine level before flushing began was noted to be **Zero**.

4. In a number of locations where flushing was programmed on a daily basis, and free chlorine level was raised to 1.5 mg/l, after 24 hours free chlorine levels had fallen below 0.2mg/l and some times to **Zero**

5. In some instances even prolonged flushing was incapable of raising levels above the minimum required by FDEP.

6. In many instances large volumes of water were flushed (12,000 –45,000 gallons). The reason for this is not indicated and is assumed to be in response to customer complaints.

Docket No. 010503-WU Exhibit VAK-19 Page 3 of 60

CONCLUSIONS:

The conclusion that the program of flushing as carried out Aloha in the year 1999, may not have been capable of delivering water that was "clean, clear and safe" at ALL TIMES is inescapable.

The flushing program was not capable maintaining the minimum free chlorine residual required by FDEP in certain areas, even for 24 hours after flushing had raised it to 1.5mg/l. The observation that no flushing was undertaken over the 48 hour weekend period raises the strong probability that intermittently in many areas Aloha's delivered water may have contained less than the minimum free chlorine residual for disinfection required by FDEP.

Clarity of water was also frequently compromised. Such loss of clarity occurring in the winter month of November when water utilization is usually higher than in summer due to the presence of "snow birds" raises the concern that in summer months when chlorine dissipates due to higher temperatures, loss of clarity due to the presence of suspended matter would have been even higher!

In the face of these findings, the production of intermittent black water and rotten egg smell in domestic plumbing in some areas of Aloha's service territory cannot any more be explained as exclusively due to some unique chemistry that is confined to domestic plumbing.

Docket No. 010503-WU Exhibit VAK-19 Page 4 of 60

FLUSH SCHEDULE

ADDRESS	TYPE	DAYS START DONE CL/2	CLOSE CL/2	START COLOR	GAL'S FLUSH
		1		1 i	1 :
Davenport & Mitchell Blvd.	FH	D IN	115		1500
Haverhill Cul De Sac	FH	D 1.5	1.5	C.	100
Wyndham	BO	DIE	115	15	ICO.
1441 Haverhill	FH	D 15	115		100
Cheltnam	FH	D 1.5	1.5	C.	100
1050 Trafalger	FH	P 15.	11.0	C	ioo
Daleside	FH	D I.C			00
Grimsby	FH	DIE	1.6	đ	IDC
Stroud & Dawsbury	FH	DIE	115	E	100
Stroud Court	BO	D I	110		
Wyndtree & Hooversham	FH	D	112-		1.22
Farmingdale	FH	DIN	i. 5		100
Forestedge	FH	DAIS	112		- VII
L VIXOVYEV		×	+-+		
Lake Haven Drive & Haden	FH	D 15	1.5	į	100
Cimmeron	FH *	D 1.5	15	C.	100
Central Park Avenue	FH	DID	1.5	2	200
Aristocrate Drive	FH	D 1,5	115	3	ipa
East Base	FH	D.15	i.C	C	100
Success Drive	FH	DIS	1.5	E	1007
Any hydrant in new section .	FH	MWF	1.5	3.	NC(2)
Riveria & Cachette	FH	DI	1.5	C	200
Riveria at boat deck	BO	DO	1,5-	C	200
Ground Squirrel	FH	MWF			
Arboretum	FH	যায়			
Moon Shadow & Whisper Woods		TT			
2822 San Pedro (Hills of San Jose)		MWF			
O'Hera & Tori	BO	TT			
7238 Riverbank	FH	MWF			
Sun Bank	FH	TT			•
4540 Rowan Road	FH	MWF			
Onorio	FH	D			
Akuri	BO	MWF			
Jerrilyn	BO	TT			ŕ
Church of Shoot Street	BO				
4818 Murcross	BO	77			
Wease]	FH	MWF			
Florida Power	FH ·	TT			
Bostonian Loop	FH ·	W	·		
Harrow Place	FH	<u>₩</u> D			•
	FH	TT.			
		11 1			
Severn Place					
Severn Place Gem Court	FH	MWF			
Severn Place					

DATE: 6-4-40

NAME: - MANNIN MEANMAN

FH=Fire Hydrant BO2Blow Off

C=Clear Y=Yellow B=BlackO=Odor A=Air/Milky

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH ITII CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEARII

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Docket No. 010503-WU Exhibit VAK-19 Page 5 of 60

FOX HOLLOW FLUSH SCHEDULE

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FH=Fire Hydrant BO=Blow Off D=Daily

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C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

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DATE: 6-4-44

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NAME: JUDN & HAIR iwa-

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FH=Fire Hydrant BO-Blow Off C=Clear Y=Yellow B=BlackO=Odor A=Air/Milky

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4540 Rowan Road	EH	WAL O'S	<u> </u>	+	00.5
Zun Bank			<u> </u>	·	<u> </u>
7238 Riverbank	EH	WME -		<u></u>	
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2822 San Pedro (Hills of San Jose)		MWF 0.3	5'1	2-2	0.05
sbooy Transfer & Whisper Woods	EH	<u> </u>	-		
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Ground Souirrel	FH	MME 0'2	6.1	2	005
Riveria at boat deck	BO	<u>80</u> a	81	2	002
Riveria & Cachette	FH	011 0	87	2	00 p
noitoos won ni insibyd ynd	EH	Z 7 JMM	-4.7	~ ~	Q
Success Drive	EH	1'1 a	Z'/	2	0
म्हरने हराय	FH	510	51	2	0
Aristocrate Drive	<u></u>	D / P	1.2		0
Central Park Avenue	EH	S'I . a	1.5	3	0
Cimmeron .	EH	50.0	21	5	OQ_S
Lake Haven Drive & Haden .	ЕН	87. a	<u>s</u> t		- The second sec
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	<u>EH</u>	87 Q	-3.1		0
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Seleside ·	EH.	D 3.0	3.0	2	0
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Chelman	FH	67 0	21	2	0
IlithavaH 144	EH	D 37	1.5.1	2	0
madbryW	BO	ore a	0.6	7	0
Havemill Cul De Sac	EH	57 C	67	. 7	0
Davenport & Mitchell Bivd.	EH	D Q'3	51	5	002
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FLUSH SCHEDULE

Pocket No. 010503-WU Pocket No. 010503-WU

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FOX HOLLOW FLUSH SCHEDULE

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ADDRESS	TYPE	DAYS STAR DONE CL/2	T CLOSE CL/2	START COLOR	GAĽ'S FLUSH
		MWF	1		
Arlinbrook	<u>FH</u>		0,2		200
9033 Belmeadow	FH	_ mw F		1.0	
8838 Belmeadow	<u>_FH</u>	_ MWE	0.3	1.0	100
9129 Callaway	FH	MWF	0.2	0,8	500
2356 Troski	FH	MPF	0.1	0.8	700
Boomington & Hominy	FH	mwF	ļ <u>_,</u>		
Spottswood	FH	mwF			
Hagen Drive	FH	MWF	0.4	1.0	300
Fox Hollow Club House	FH	MWF			
Hagen Drive	FH	mut			
Club House	BQ	mwŕ			
Ventura	FH :	MWF		1	
FUXWOOD:					
Tamarind	FH	M-TH 1.0	1.2	<u> </u>	50-
Cross Vine	FH	M-TH 1.2	1.2-	<u> </u>	0
WYNDGATE:					
Courtlia	FH	T-F			
Craighurst	FH	T-F	·		
Orchard Grove	FH	T-F			<u> </u>

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

DATE: 67-99

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NAME: Juan Z

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FLUSH SCHEDULE

ADDRESS	ΤΥΡΕ	DAYS STAR DONE CL/2	T CLOSE CL/2	START COLOR	GAL'S FLUSH
· ·				I Ć	1.
Davenport & Mitchell Blvd.	FH	D 115	1.5		4000
Haverhill Cul De Sac	FH	D 15	115	<u> </u>	EC .
Wyndham	BO	D 1.5	1,5	<u> </u>	100
1441 Haverhill	FH	DIC	115	C.	DD
Cheltnam	FH	DIS	15	C	100
1050 Trafalger	FH	D 5	1.5	E	100
Daleside	FH	D 15	1:5	12	100
Grimsby	FH	DIC	1.1	L C	100
Stroud & Dawsbury	FH	DIS	1.5	Ċ	lion
Stroud Court	BO	РÜ	115	1 d	1000
Wyndtree & Hooversham	FH	DIS	15	6 m	107
Farmingdale	FH	D	1:5	S.	100
Forestedge	FH	D 1.5	115	0	()/;
		· · ·			
Lake Haven Drive & Haden	FH	DIL	1.0	, the	40.6
Cimmeron	FH	D	E	1 ·	1012
Central Park Avenue	FH	D 1.5	11.3		19(-)
Aristocrate Drive	FH	D 15	1.5	C.	1073 ····
Fast Base	FH	DI	15	0	19.6
Success Drive	FH	D 1.C.	1.5	C.	Inci
Any hydrant in new section -	FH	MWF			1
Riveria & Cachette	FH	D 1.5	1.5	S.	100
Riveria at boat deck	BO	D 1.5	1.5	C	100
Ground Squirrel	FH	MWF			
Arboretum	FH	TT 105	15	<u>C</u> P,	100
Moon Shadow & Whisper Woods	FH	TT O	1.5	<u> </u>	2000
2822 San Pedro (Hills of San Jose)	BO	MWF			
O'Hara & Tori	BO	TT Q	1,5	Ŗ	1000
7238 Riverbank	FH	MWF -			- \
Sun Bank	FH	TT			
4540 Rowan Road	FH	MWF	ŀ		<u> </u>
Onorio ·	FH	D			
Akuri	BO	MWF			
Jerrilyn	BO	TT		•	f-
Church of Shoot Street	BO	TT			
4818 Murcross	BO	TT			
Weasel	FH	MWF			
Florida Power	FH ·	TT			
Bostonian Loop	FH	W			
Harrow Place	FH	D			•
Sevem Place	FH	TT			
	FH	MWF			
Gem Court	FH	MWF			
Alvernon Villa Entrada	BO	MWF			
VIIIa Entraga				0	
DATE: 10-10-0.01	-	NAME: DUC	n a	molin	٨

FH-Fire Hydrant BO-Blow Off C-Clear Y-Yellow B-BlackO-Odor A-Air/Milky

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NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH ITIL CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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	4	FLUSH SCH	EDULE	Docket No. 010503-Wi Exhibit VAK-19		
		DAYS START	CLOSE	Page START	9 of 60 GAL'S	
ADDRESS	TYPE		ÇL/I	COLOR	FLUSH	
			-		1	
Davenport & Mitchell Blvd.	FH	$D I_i C$	1.5	Ú.	1000	
Haverhill Cul De Sac	FH	D 1.0	15	C /	CT973	
Wyndham	BO	D 15	1,E		100	
441 Haverhill	FH	D 115	ir	Č.	100	
Chelmam	FH	D		13 1	172	
050 Trafalger	FH	D 1.5.	:5	Ċ	100	
Daleside	FH	D	1:5	d'	170	
Jrimsby	FH	D		e e	100	
Stroud & Dawsbury	FH	D 15		¢	100	
Stroud Court	BO	DIS	1.5		it-c	
Wyndtree & Hooversham	FH	Dic	1.5	ł.	100	
Farmingdale	FH	D 115	1.5	1	100	
Forestedge ·	FH	D_ 2.<	1.5		1077	
ake Haven Drive & Haden	FH	D 1,()	jiS	÷.	200	
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Central Park Avenue	FH	DIE	1.5	<u></u>	IF O	
Aristocrate Drive	FH	D 115	1.6	A	Visi	
East Ber	FH	D 14		J	ICE	
Success Drive	FH	D	112	2	INT.	
Any hydrant in new section	FH	MWF 4.5	1.5	Č	100	
Riveria & Cachette	FH	D 15	115	d	127	
Riveria at boat deck	BO	DIS	115	1.	100	
Ground Squirrel	FH	MWF 1.5	1.5	C	100	
Arboretum	FH	TT				
Moon Shadow & Whisper Woods		TT			. (
2822 San Pedro (Hills of San Jose)	BO	MWF 105	:55		100	
O'Hara & Tori	BO	TT				
7238 Riverbank	FH	MWF				
Sun Bank	FH	TT	N		•	
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DATE: (-1 44

- YINL MAN NAME: _____AAAA 73

FH=Fire Hydrant BO=Blow Off

C-Clcar Y-Yellow B-BlackO-Odor A-Air/Milky

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH ITIL CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEARII

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 FH=Fire Hydrant BO-Blow Off

 C=Clear Y=Yellow

 B=BlackO=Odor A=Air/Milky

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ويتأكي	BO	<u>11</u>		•	
, kuri	BO	MWF			
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noT & meH'(BO				
(222 San Pedro (Hills of San Jose)	08 (sso	MWF			
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Istning Sound	EH	WME I'Z	51	~ ~ ~	oht
ivena at boat deck	<u>. BO</u>	D Q	-51		001-1
ះរុកបាន & Cachette	FH	51 a	51		40
· noitoos won ni insibyi yn,	н	WWF			
vecess Drive	H. EH				
Ters Berge	<u>H</u> _	रग त	21		- 015t
aving atenaoten.	ĒĤ	<u>_</u>		Y	
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	EH	d		P	
ake Haven Drive & Haden .	EH	511	57	7	
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	<u>EH</u>	510	_51	<u>,</u>	001
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FOX HOLLOW FLUSH SCHEDULE

ADDRESS

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	FH	MNF	1		
	FH	mwF			
	FH	mwFi	1.5	<u>ل</u>	100
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2356 Troski 💥	<u>FH</u>	m ~ Fis	1.5		100
Boomington & Hominy		_ mwfts	115	Ċ	100
Spottswood +	FH	mw AG	1,5	<u>د</u>	100
East Hallow Club House	FH	MW FIS			
Fox Hollow Club House	FH	MWF	···· · · · · ····		
Hagen Drive Club House	BO	mut	· · · · · · · · · · · · · · · · · · ·		
Club House	FH	m		2	
· · · · · · · · · · · · · · · · · · ·			<u> </u>		
FUXWOOD: PANLL	1	1,5	1.5	E	40
Penand HRLAN	*/FH	м-тн О	1.5	Ċ.	1000
Cross Vine	FH	M-TH 45	115	C	100
BAISA Fidya		1.5	1.5	C	40
WYNDGATE:					
Courtlia	<u>FH</u>	<u>T-F 1.5</u>	1:5	2	100
Craighurst	<u>FH</u>	T-F 105 T-F 115	1/5	<u>·</u>	100
Orchard Grove	FH		105	E	
ALMOND WOOD		115	1,5	-	40

FH=Fire Hydrant BO=Blow Off D=Daily

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C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

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DATE: 6-18-99

NAME: ALLANS in Min- Line-

THROUGH ITIL CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEARII NO HADBYNL OF BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING

C=Clcar Y=Yellow B=BlackO=Odor A=AirMilky FH=Fire Hydrant BO=Blow Off

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			D	EH	• • • • • • • • • • • • • • • • • • •
	1		MWF	FH	4540 Rowan Road .
•			II	EH	Sun Bank
	+		WME -	EH	7238 Riverbank
				BO	
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			<u> </u>	EH	Moon Shadow & Whisper Woods
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	-5	51	5! 0	EH	<u></u>
aor	5	51	51 0	EH	Daleside
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			ă	ĒH	Havemill Cul De Sac
2000	7	51	50.0	EH	Davenport & Mitchell Blvd.
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ELUSH SCHEDULE

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FOX HOLLOW FLUSH SCHEDULE

ADDRESS	TYPE	DAYS DONE		T CLOSE CL/2	START COLOR	GAL'S <u>FLUSH</u>
Fox Hollow Club House	FH FH FH FH FH FH FH FH FH FH FH FH FH F		N F N F N F N F N F			400 2.000 1000 2000 1000 1000 1000 1000
FUXWOOD:			Ő	1,0	Ċ	5000
Tamarind Cross Vine BALSA Kidge WYNDGATE:	FH FH	M-TH M-TH	0	110	Ċ	5000
Courtlia Craighurst	FH FH	T-F T-F		·		· · · · · · · · · · · · · · · · · · ·
ACHUNO WO 21	FH	T-F	0	10	Ċ	5000

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

DATE: 6-2 2-46

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NAME: JUNK a fidir

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FLUSH SCHEDULE

-		DAYS START CLOSE START GAL'S
ADDRESS	TYPE	DONE CLO OLD
1001000	1112	DONE CL/2 CL/2 COLOR FLUSH
Davenport & Mitchell Blvd.	FH	D 0.1 1.5 C 2200
Wyndham	BO	MTH 1.5 1.5 C 400
1441 Haverhill	FH	D 7020 C 600
Chelmam	FH	MTH 115 1.5 0 1000
1050 Trafalger	FH	T/F
Daleside	FH	T/F
Stroud & Dawsbury	FH	D 0.6 5 0 3000
Stroud Court	BO	D 0.5 15 1 300
Wyndtree & Hooversham	FH	M/TH 1.5 1.5 C 1.10
Forestedge	FH	D. 0. 1 1.5 (1200
Country Place:		
Lake Haven Drive & Haden	FH	T/F
Cimmeron	FH	T/F ···
Central Park Avenue	FH	T/F
Aristocrate Drive	FH	T/F
East Bay	FH	T/F
Industrial:		ži. 🛫
Success Drive	FH	T/F
Riveria at boat deck	BO	D Q 1.0 (3200
Ground Squirrel	FH	M-TH 1.1 1.5 C. 1200
Arboretum	FH	M-TH ().8 115 (1300)
2822 San Pedro (Hills of San Jose)	BO	MWF M.Y 1.F (2500
Tori Court	BO	TT
4540 Rowan Road	FH	TH
Akuri	BO	MWF
Florida Power	FH	MWF
Harrow Place	FH	D
Severn Place	FH	TT
Villa Entrada	BO	MWF 0, 1 0.8 30000
Wood Bend	FH	TH
DATE: 7-26-99		NAME: HEFREDO PARRA

FH=Fire Hydrant BO=Blow Off

C=Clear Y=Yellow B=BlackO=Odor A=Air/Milky

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

SAN Radael ſØ O Gem CT 0.3 5300 Vista Veidi back fire Hydrant -A 4600

FOX HOLLOW FLUSH SCHEDULE

		DAYS	START	CLOSE	S	TART	GAL'S
ADDRESS	TYPE	DONE	CL/2	<u>CL/2</u>	С	OLOR	FLUSH
8838 Belmeadow	<u>FH</u>	MWF			·		
9129 Callaway	FH	MWF					
2356 Troski	<u>FH</u>	MWF				· .	
Bonnington & Hominy	FH	MWF					
Spottswood	FH	WF					
Hagen Drive	BO	MWF					
Ventura	FH	MWF					
Balsaridge	FH	MWF					
FOXWOOD:							
Terilind	FH	W/F					
Cross Vine	FH	W/F					
Daylilly	FH	MWF					
WYNDGATE:							
Courtlia	FH	MWF	0.2	1. ()	(*	2100
Craighurst	FH	MWF	015	1,2	3	0	2400
Orchard Grove	FH	MWF		ι"			
Heritage Springs:							
Almond Wood		MWF	()	1.0	>	<u>c</u>	4300

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

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DATE: 7-26-99 NAME: ALFREDO PARRO

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Vertures find recoling was 1,0 3 mun fales 0.9. Then Smin dates 01 S '9 0200 NINE T 7: IMANE: (DATE C=Clear Y=Yellow B=Black O=Odor A=Air/Milky 1 D=Daily FH=Fire Hydrant BO=Blow Off J WMF booW bromIA S 018 000 Heritage Springs: 2'0 8'0 Orchard Grove MWF HH 201 5 LTaighurst MWF FH <u>silruo</u> D EH 229 MWF ŁQ WYNDGATE: 7, VILIPOD 290 MWF FH 5. 5 000 $\overline{\mathbf{0}}$ Cross Vine T/W HH h builing NK14231 \mathcal{T} T/W HH $\overline{\Omega o}$ U FOXWOOD: Balsaridge σ 200 MWF HH 0.10 Ventura 5 MME HH Hagen Drive 111 57 MME BO poomstoods 000 WF FH 000 9 F MWF HI Bomington & Homing 000 j MWF HH 2356 Troski C 9129 Callaway N MWF HH MWF wobeamlaß 8588 HH ∞ \cap HSATA DONE CL/2 TYPE **SSERESS** ROLOR CTJ TAAR DAYS START CLOSE S. TV9

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		FLUS	H SCHL	DULLE		naffa	e II// ODE (HIL)
,	ΤΥΡΕ	DAYS DONE	START CL/2		STA COL		GAL'S FLUSH
ADDRESS ·							
e Michell Blyd	FH	D					
Davenport & Mitchell Blvd.	BO	M/TH					
Wyndham	FH	D					
1441 Haverhill	FH	M/TH					
Chelmam	FH	T/F					
1050 Trafalger	FH	T/F					
Daleside	FH	D					
Stroud & Dawsbury	BO	D					
Stroud Court	FH	M/TH					
Wyndtree & Hooversham	FH	D					
Forestedge	111						
Country Place:	FH	T/F					
Lake Haven Drive & Haden	FH						
Cimmeron	FH	 T/F					
Central Park Avenue	the second se	 T/F					
Aristocrate Drive	<u>FH</u>						
East Bay	FH	1/1					
Industrial:							
Success Drive	FH	T/F	41	· · · · ·	1,5		1,000
Riveria at boat deck	BO			<u>,</u>)			0
Ground Squirrel	FH	M-TH					
1 h an at 100	FH	M-TH					
2822 San Pedro (Hills of San .)	Jose) BO	MWF					
Tori Court	BO	TT					
4540 Rowan Road	FH	TH					
Akuri	BO	MWF					
	FH	MWF			13	\mathcal{C}	1501
Florida Power Harrow Place	FH	D	0	41-	12		IIX
Severn Place	FH	TT_	0	14	1.3		
Villa Entrada	BO	MWI					
	FH	TH					-
Wood Bend			$\widehat{\Omega}$	10	Frehus	NOV	-
DATE: 8/3/99		NAM	1E: []] [1d >	TRAM	7/01	

FH=Fire Hydrant BO=Blow Off C=Clear Y=Yellow B=BlackO=Odor A=Air/Milky

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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Rogelo oak.

0,2 B \$500 upt raise cl2 level 2 after 4-500 gallon: O.O could upt

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FOX HOLLOW FLUSH SCHEDULE

	ADDRESS	TYPE	DAYS DONE		CLOSE CL/2	START COLOR	GAL'S FLUSH
Эпи	8838 Belmeadow 9129 Callaway 2356 Teoski Bonnington & Hominy Spottswood Hagen Drive Ventura Balsaridge FOXWOOD: Teriliad IELEALUN Cross Vine Daylilly WYNDGATE:	FH FH FH FH FH BO FH FH FH FH FH		1 2 C 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1.1.1. 1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.1.1.1. 1.		21000 21000 21000 21000 21000 21000 21000 21000 21000 21000 21000 21000 21000 21000
	Courtlia Craighurst Orchard Grove	FH FH FH	MWF MWF MWF				
1675100	Heritage Springs: 7-Almond Wood		MWF	0.4	1.5	C	5,000
1137	FH=Fire Hydrant BO=BI C=Clear Y=Yellow B=F DATE: \$\frac{9}{5}/9 WINDSLOE_7 ALMOND WODD	Black O=	=Odor A	=Air/Mil			Ер 45 MW Ер 45 MW

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FOX HOLLOW FLUSH SCHEDULE

ADDRESS	TYPE	DAYS START CLOSE DONE_CL/2_CL/2	START COLOR	GAL'S FLUSH
8838 Belmeadow	FH	MWF 1.5 1.5	<u> </u>	2,000
9129 Callaway	FH	MWF 110 1.5	<u> </u>	<u>_2;000</u>
2356 Breaki TOSKI	FH	MWF		
Bonnington & Hominy	FH	MWF		
Spottswood	FH	WF		
Hagen Drive	BO	MWF		
VERTURI	FH	MWF		
Balsaridge	FH	MWF0.0 (.5	e	2,000_
FOXWOOD:			·	
Forties TERCALYN	FH	W/F D.D 1.5		3,000
Cross Vine	FH	W/F D.D 1.5		2,000
Daylilly	FH	MWF0.0 1.5	<u>C</u>	4,000
WYNDGATE:				
Contina COTLEIGH	FH	MWF		
Craighurst	FH	MWF		
Orchard Grove	FH	MWF		
Heritage Springs:				
Almond Wood		MWF 0.0 1.5		20,000

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FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky DATE: $\overline{3}|9|99$ NAME: Multiplican 35KIN WINSLOE (TAMAEND) 0.2 1.5 C 18000 WINSLOE (LEFT) 0.0 1.5 C 5,000 CASSIA 0.0 1.5 C 4,000

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FLUSH SCHEDULE

ADDRESS	TYPE	DAYS STAI DONE CL/2		START COLOR	GAL'S <u>FLUSH</u> Metc ^r
Davenport & Mitchell Blvd.	FH	D 0.4	1,5	C.	15.000
Wyndham	BO	M/TH/14	1.5	<u> </u>	250
1441 Haverhill	FH	D 15	1.5	C	50
Chelmam V	FH	M/THI 5	115	- 0	50
1050 Trafalger	FH	T/F 1,5	[15		50
Daleside	FH	T/F 1.5	1:5	C	50
🕹 Stroud & Dawsbury	FH	D.O.4	1,5	C	lex 000
Stroud Court	BO	D0,0	<u> </u>	<u> </u>	300
Wyndtree & Hooversham	<u>FH</u>	M/THI15		<u> </u>	50
Forestedge	FH	D	_		
Country Place:					
Lake Haven Drive & Haden	FH	T/F 0,0	1,5	C	4.000
Cimmeron	FH	T/F0.6	1.5	C	12600
Central Park Avenue	FH	T/F(,O	1.5	<u> </u>	1000
Aristocrate Drive	FH	T/F/./	1.5	<u>C</u>	2,00
East Bay	FH	T/F0. 9	1,5	C	1,400
Industrial:					/
Success Drive	FH	T/F	- V		21/
Riveria at boat deck	BO	D0.3	00 1.0	$C_{\mathbf{q}}$	2000 2
Ground Squirrel	FH	M-TH . S	1.5	<u> </u>	V 1200 315 4 -
J Arboretum CADTILA 1100	FH	M-THO.D	344.13115	<u> </u>	290131 015 1 1
2822 San Pedro (Hills of San Jose		MWFO,9	1.5	L	3700 2HOUVE - M, 1
Tori Court	BO	TT			3/700 2HOURS 3/W/ps
4540 Rowan Road	FH	TH			
Akuri AUKAAI Onily	BO	MWF 0.7	1.6	<u> </u>	500
D Florida Power	FH	MWF0, 4	<u> </u>		If the
Harrow Place	FH	DQ:	112		TIU U
net-Severn Place	FH	TTHO	4.7	-	100-
P <u>Villa Entrada</u>	BO	MWFO, 8			700
Wood Bend	FH	TH	7 1	Good	4
date: <u>5/24/99</u>	-	NAME:	days	Holes	after
FH=Fire Hydrant BO=Blow Off			<i>v</i>		L

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

C.

B=BlackO=Odor A=Air/Milky

De Boyal oak. 1,0 1,5 D. SANRA frel 1.5 D. Vistaberdr. 0.8 1,5 D. Sem. Ct. 1,0 1.5 D. SANPebroo, 5 1.5

C=Clear Y=Yellow

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FOX HOLLOW FLUSH SCHEDULE

		DAYS		CLOSE	START	GAL'S
ADDRESS	TYPE	DONE	<u>CL/2</u>	<u>CL/2</u>	COLOR	<u>FLUSH</u>
8838 Belmeadow	FH	MWF				
9129 Callaway	FH	MWF				
2356 Hocki 105KI	FH	MWF				
Bonnington & Hominy	FH	MWF				
Spottswood	FH	WF				
Hagen Drive	BO	MWF				
VERTURI VENTURI	FH	MWF				
Balsaridge	FH	MWF	0. <u>3</u>	1.5	\mathcal{C}	2,000
FOXWOOD:						
Terilind TECRAINN	FH	W/F	0.2	1.5	(24,000
Cross Vine	FH	W/F	1.0	1.5	C	4,000
Daylilly	FH	MWF	0.3	1.5	<u>C</u>	2,000
WYNDGATE:						
Gourilia OKTUEIGH	FH	MWF	0.7	1.0	C	12yoor
Craighurst	FH	MWF				
Orchard Grove	FH	MWF				
Heritage Springs:						
Almond Wood	FH	MWF	0.2	1.5	<u>(`</u>	12,000

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

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DATE: \$ 24 99 NAME: 2,000 FALLOWFIELD BO 1.D 1.5 WINSLOET TAMARIND FH 0.4 72,000 (.0 WINSLOE (LEFT) FH 0.4 PER 1.0 24,000 CASSIA FH 24,000 0.0 1.0 WYNGATE BO 0.7 1.0 000, CI) .

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C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

FH=Fire Hydrant BO=Blow Off D=Daily

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<u> </u>				····· • • •	Heritage Springs:				
220,01	250	51	WME ~ V	H.H.	Orchard Grove				
JEALE .	<u>, 2, 2, C</u>	- stake	WML J LAW	FH	Craighurst				
30,000	5	<u>S'I</u>	MME) O'C	EH	Eunite Countries				
1			~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~		WYNDGATE:				
CRV 7	2	51	MWF D.S	FH	Vaylillys				
200'7	\sim	51	M/F 1).(FH	Cross Vine				
			W/F	ਸ਼ਿ	NUA933Thatter				
					FOXWOOD:				
2001/		51	MWF ().4	FH	Balsaridge				
222/6		1.2	MWF O.J	FH	Ventura VENTURI				
	?	57	MWF 0.2	BO	Hagen Drive				
CRO C	()	<u>>'/</u>	ግ'⁄ IM	FH	boowshods				
7,020	$\overline{}$	1-2	MWF D.G	FH	vnimoH & norgninnoH				
020,7	\sim	5.1	MWF 0.7	FH	2356 These Tosk				
000 6		5.1	MWF J.D	FH	9129 Callaway				
222'	Ð	51	SI IWM	EH	8838 Belmeadow				
HSATH	COTOS	CTJ	DONE CTV	TYPE	SSINGAL				
S.TV9	TALL	SCTORE .	LANTE EYAG						
	- LOX HOLLOW FLUSH SCHEDULE								

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FLUSH SCHEDULE

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		rlush sch	ILDULE	Page 2	3 of 60	
~		DAYS STAR	T CLOSE	START	GAL'S	
ADDRESS	TYPE	DONE CL/2	CL/2	COLOR	_FLUSH	
				•		
Davenport & Mitchell Blvd.	FH	D 1.0	1.5	C	3.000	<u>.</u>
Wyndham	BO	M/THO.9	1:5	\sim	900	
1441 Haverhill	FH	D 1.5	1,5	C	(57)	
Chelmam	FH	M/TH				
1050 Trafalger	FH	T/F / /	. 5	<u> </u>	700	
Daleside	FH	T/F Lin h	6		Gra	
Stroud & Dawsbury	FH	D 0.7	1.		900	
Stroud Court	BO	D0141	12	<u>~</u>	- HOOV	
			1.2		400	
Wyndtree & Hooversham	FH	MTH 5			<u> </u>	
Forestedge	FH	D			COST P	
Country Place:				· · · · · · · · · · · · · · · · · · ·		
Lake Haven Drive & Haden	FH	<u>T/F</u>				
Cimmeron	FH	<u>T/F</u>		· · · · · · · · · · · · · · · · · · ·		
Central Park Avenue	FH	T/F	·····	·	<u></u>	
Aristocrate Drive	FH	T/F			_	
East Bay	FH	T/F				
Industrial:						3.1
Success Drive	FH	T/F				NIN MAN
Riveria at boat deck	BO	DAIO	2.8	C.	1400 25	
Ground Squirrel	FH	M-THO.6	1.6	2	(100)	. 10
Arboretum CAPTIVA CY		M-TH(2,0	1.	K	None 14 1	no FING
2822 San Pedro (Hills of San Jos	•) B()	MWF	<i>/-</i>		1400 23th 6000 1800 by th	T
	BO					
Tori Court				<u>_</u>		
4540 Rowan Road	<u>FH</u>	TH				¢.
Alerri AUKARi 8341	BO	MWF	1 9 1 7	<u>ې</u>	2.00	
Florida Power	FH	MWF (), O	1, 2 4 2	<u>C</u>	2000	
Harrow Place	<u>FH</u>	D (), 1	1,0		3000	
Severn Place	FH	TT				
Villa Entrada	BO	<u>MWF().3</u>	1.5		2,100	
Wood Bend	<u> </u>	TH				
a kalaa			ρ	0t-t-		
DATE: 8 123199		NAME KOT	Inly 2	mahana	un -	
					-	
FH=Fire Hydrant BO=Blow Off						
C=Clear Y=Yellow B=Bla	ckO=Odo	r A=Air/Milky				
					•	j
NO HYDRANT OR BLOW OFF	WILL B	E TURNED OFF	WITH ANY D	ISCOLORED WAT	ER COMING	/
THROUGH IT!! CONTACT SU	PERVIS	OR IF YOU CAN	YT GET IT CL	EAR!!		Í
			_			1
D. Royal oak. D. SAN RA FAEL	O_{1}	1,9	7	-2	6700	2
Pilloya baru		$n \cup$			67200	
					_	1
ACOLI	1.1	15		C	900	
N. JANKA HAEL	110	1,5		\bigcirc	100	
		, -				
J. VISTAVebers	\mathcal{A}	2	1,5	······································	9900	
VISIAVedeld	F1. ()	12 1	17	ype	2,200	
				/	1	
. Gen Ct O.	/	^				
· YIDMI (T. B	5	· · · · ·	5		2 -1	•
	\checkmark	11	\mathcal{I}		3,070	
G. P. Loo				<u> </u>		Ť
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FOX HOLLOW FLUSH SCHEDULE

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ADDRESS	TYPE	DAYS START CLOSE DONE CL/2 CL/2	START COLOR	GAL'. FLUSL
	1711	MWF 1.2 1.5	$C_{}$	2,000
8838 Belmeadow	<u> </u>	MWF 1/2 1.5	<u> </u>	3.000
9129 Callaway	<u>FH</u>		C,	4000
2356 Troski	FH	MWF [1.3 [15	<u></u>	Rand
Bonnington & Hom	iny FH	MWFI. 115		97 000
Spottswood	<u>FH</u>	WFDA 15	75	- and
Hagen Drive	BO	MWFOIL 13	>	Done
Ventura	FH	MWH0.4 1.5		193000
Balsaridge	FH	MWR703 1.5		dejozo
FOXWOOD:				90000
Tennod terra	LYN/FW	W/F/9, 4 1, 5		20000
Cross Vine	FH/2	5W/F 000 1,5	<u> </u>	14000
Daylilly	FH	MWR015 115	<u> </u>	101000
WYNDGATE:				- the second
Courtlia	FH	MWF (18 115	<u> </u>	C. NOT
	FH	MWF/ 0 1.9		1000
Craighurst	FH	MWF 0.51.5	<u> </u>	_X000
Orchard Grove	111			
Heritage Springs:		MWF(), - 1.	5 C_	50,000
Almond Wood				
		and the second		

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

DATE: 9/2/99 Fellow Ship 1.0 WINSLOE 013 WINSLOEGTAMARINDAOIH WINdGAte B.O. 1.0

NAME: Book E 1,5

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C 9,000

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C10,000 C6,000

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0.0 HT Marzida 820101 51 a,0 och staperapu әіпрәуәс уรпіf/รшлоf/รләцәү 312130(Nh(M

LHBONCH ILII CONLYCL SNDEBNISOB IL XON CYNL CEL IL CTEVBII No hadbynl ob brom oll mitt be lnbned oll milh yna discofobed myleb coming

FH=Fire Hydrani BO=Blow Off C=Clear Y=Yellow B=BlackO=Odor A=Air/Milky

DATE: _ 66/0/6

WWNE:

Docket No. 010503-WU

	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	P11	- 2.0-	D		- Vista Verde Drive
222 20	<u> </u>	51	∀ डैंच उँम			O <del>TPOLIE</del> S
				<u> </u>		- Gem Court
220,2	<u></u>	51		<u> </u>		-San Rafael
(200:2)	<u></u>		50	<u></u>		- Royal Oak
19 200	<u> </u>	51	5.0	-HI	EH	- Wood Bend
220	3	<u> </u>			BO	- Villa Entrada
2228	<u></u>		+·0 51	<u> </u>	<u>EH</u>	~ Severn Place
225	2	<u>- ~'/</u>	0.4 	<u> </u>	<u>—н</u>	- Harrow Place
222/2			50	<u> </u>	<u></u>	- Florida Power
020/5	<u> </u>	<u></u>	<u> </u>	TTTT	<u></u>	MANUA INMA
222:8		51	- <u>[ç</u>	HL	<u> </u>	- 4540 ROWAN ROad Stel
000 9					BO	Tori Court
	~		3.5		<u>– 0 ਜ (</u>	- 2822 San Pedro (Hills of San Jose
0.01	<u> </u>	9'E		HI-M	H	- Arboretum CAPTIVA
*	<u> </u>	<u>0'8</u>	0.5	HI-W	H	Ground Squirrel
टर्ग्ड.	<u> </u>		-র্নুন্চ	D	BO	-Riveria at boat deck
*	<u> </u>	51		<u></u>	EH	Success Drive
						Industrial:
`				- <del>1</del> /J	НЧ	East Bay
				<u> </u>	<u>– н</u>	Aristocrate Drive
		50. <b>1</b> . <b>1</b> .		$\frac{-1/T}{-1}$	<u>H</u>	Central Park Avenue
				<u> </u>	НJ	Cimmeron
				<u></u>	EH	Lake Haven Drive & Haden
<u> </u>						Country Place:
			37835	D F	EH	Forestedge
	- 0 - C ( N92)	1.111/1351			EH	Wyndree & Hooversham
	E Vial-	S.C.	Q'Q	D	BO	- Strond Court
3,800		<u> </u>	- <u>ठ</u> . ह	<u> </u>	EH	· Strond & Dawsbury
CALLEC			<u> </u>	<u> </u>	EH	<u>Daleside</u>
		9.8	5.8	T/F	EH	1050 Trafalger
202	<u></u>		<u> </u>	HT/M	FH	Chelmam
205			<u>-ò-Ē</u>	D	EH	- 1441 Haverhill
- 20-		<u> </u>	<u> </u>	HT/M	BO	medbarw.
230	0	<u> </u>	<u> </u>	D	ਜਿ	Davenport & Mitchell Blvd.
			<u>Z/12</u>	INOU	LYPE	ADDRESS
HSATS	KOTOS	CT\3	+·	DAK	TUDE	·
S, TVD	TAAT	SOLOSE	TAAT	SAPU		
61-2	Exhibit VAR Exhibit VAR Page 25 of 6	ALLE	HOS HE	ET NO		



### FLUSH SCHEDULE

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					U	
			START		START	GAL'S
ADDRESS	TYPE	DONE	CLA	CL2	COLOR	FLUS
	-		40	. ~	6	
Davenport & Mitchell Blvd.	FH	_D	0.0	1.	<u> </u>	
Wyndham	BO	M/TH	0.0	1.5		
1441 Haverhill	FH	D	0.0	1.5	<	
- <u>Chelmam</u>	FH	M/TH	63	1.5	C	
1050 Trafalger	FH	- <del>T/F</del>				
Dateside	-FH	-T/F-				
Stroud & Dawsbury	FH	_D	0.5	1.5	C	
Stroud Court	BO		0.3	1.5	٢	
Wyndtree & Hooversham	FH	M/TH	0.6	1.5	۷	
Forestedge	FH	D	0:5	1.5	<u> </u>	
Country Place:						
Lain Llawon Drive & Haden	FH	T/F	•	-1.5		
Cinneron	FH =	T/F		25-	<	
Children Acard		T/F	- 7	1.5	))	
Arice oroto Drive	TH -	-171	DU	77.5-1		
Fast Bay	-11	T		12		
Industrial:						
Success Drive	FH -	- <del>T/T</del>	. ``	1.5		
Riveria at hoat deck	BO	D	1.0	1.5	6	
Ground Squirrel	FH	M-TH	0.8	15	C	
Arboretum	FH	M-TH	0.0	1.5	C	
2822 San Pedro (Hills of San Jose)		MWF	0,8	1.5	C	
	BO	TT	<u> </u>			
1540 Reven Read	fii	-111		1.5		
	BO	MWF	0.7	1.5	Cint	
Akuri	the second s	MUT				4
	FH	D	05	15	(	<u> </u>
Harrow Place			00		<u> </u>	
Seven Place	FH -	TT	07		C	
Villa Entrada	BO	MWF	0.6	1.5		
Wood Band	<u>FH</u>	TH			2.77 ¹⁵	
		NAME.				
わすてを・		IVANT				

DATE: _____

NAME: _____

FH=Fire Hydrant BO=Blow Off

C=Clear Y=Yellow B=BlackO=Odor A=Air/Milky

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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### FOX HOLLOW FLUSH SCHEDULE

		DAYS START CLOSE	START GAL'S
ADDRESS	TYPE	DONE CL/2 CL/2	COLOR FLUSH
		MUE 0,31.5	C 2000
8838 Belmeadow	FH	MINI U	 
9129 Callaway	FH	MWF 0.5 1.5	<u> </u>
2356 Troski	FH	MWF (). ] 1.5	400
Bonnington & Hominy	FH	MWF 0.6 1.5	<u> </u>
Spottswood	FH	WF_0.5_1.5_	C 1500
	BO	MWF 0.5 1.5	C 2500
	FH	MWF 0.3 1.5	<u>c 2000</u>
Balsaridge	FH	MWF 0.5 1.5	6 1500
FOXWOOD:			
Terilind	FH	W/F 0.5 1.5	
Cross Vine	FH	W/F 0.3 1.5	
	FH	MWF 0.0 1.5	( 1500
Courtlia	FH	MWF 0.0 1.5	C AUDD
	FH	MWF 0, 3-1.5	C 1500
	FH	MWF 1.5 1.5	C 1000
Almond Wood		MWF 0.0 1.5	C 4000
FOXWOOD: Terilind Cross Vine Daylilly WYNDGATE: Courtlia Craighurst Orchard Grove Heritage Springs:	FH FH FH FH FH FH FH	$\begin{array}{cccccccccccccccccccccccccccccccccccc$	$\begin{array}{c} c & 2000 \\ c & 1 \\ 00 \end{array}$ $\begin{array}{c} c & 3000 \\ c & 1500 \\ c & 1500 \\ c & 1500 \\ \hline c & 1500 \\ \hline c & 1500 \\ \hline c & 1000 \end{array}$

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

DATE:

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NAME:

San Pebvo 0.510 CONTING ROSE 7 51 0.0 6.0 6/2 -Jasunyu DON DSII QQ51 5 5.1 0.0 const 0.0 COOL DS. O'L LANSISMON (100115 0005 J S !! 0.0 11-2 C 3000 6.0 Doom (Imon) A epse > si COY1 251 Q.O (1~11.1) 1. nslor Tamin D1.0 1.5 < 500 202 C 2 S 1 S 10 N'SO Sen Ratele 1.2 205 25:1 Villeentrally is 1.5 2000 751 10 10 1151 Gencourt 7 15 C 0951 Seven Dece Big 1:5C OPII DS1 O'I Drydnanbm 2001 POYNIONIC O.S. 751 OR! 6001 221 G.1 PWWA (S MONS Gundas) 751 30 2001 AboreTon Captive OS 15C 9009 Jivena Beat Ube le 1.0 1.5C Q09 55.58-5 hopmis

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### FOX HOLLOW FLUSH SCHEDULE

ADDRESS	TYPE	DAYS START CLOSE DONE CL/2 CL/2	START COLOR	GAL'S FLÚSH
		2		
8838 Belmeadow	FH	MWF / C / J	Cih.	1000 235-2:45
9129 Callaway	FH	MWF . 8 1. 5	OLR,	1000 2:50-3:00
2356 Troski	FH	MWF 1.0 1.5	Cik.	1000 3:05-3:10
Bonnington & Hominy	FH	MWF 1.0 1.5	CIR,	10003:15-3:25
Spottswood	FH	WF ,8 1.5	Cik.	500 3:30-3:55
Hagen Drive	BO	MWF 5 5 1.0	CLR	2000 335-3:55
Ventura	FH	MWF		
Balsaridge	FH	MWF 1.0 1.5	CLR	. 500 2:20 2:30
FOXWOOD:				
Terilind	FH	W/F .3 / J	Cil	2500 185-1:50
Cross Vine	FH	W/F 12 1.5	CR	1000 1:55-2:10
Daylilly	FH	MWF 1.0 1.5	CLK	5002:15-2:20
WYNDGATE:				
Courtlia	FH	MWF		
Craighurst	FH	MWF		
Orchard Grove	FH	MWF		
Heritage Springs:				49
Almond Wood	D	AT .5 1.4	CUL -	2000 1:00 -1:20

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

DATE: 10/22/99

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		•				
	<del>.</del>			HL	ĿН	X Wood Bend
Chiel-DEiOI	ong	212	57	MME 'N	BO	🗡 Villa Entrada
9110 -6101	- CALLER	0.12		<u></u>	EH	X Severn Place
Œ:11-05:01	DOOH	Nellow	N/	D . 2	EH	A Harrow Place H.L.
VEIT VIU	000//					
Sa:01-9:11	ager	U.S.	hil	WME VS	BO	X Akuri C.L S.S.
5001 2.11				<u>— HI</u>	FH	X 4540 Rowan Road
				TT	BO	X Tori Court
-	<u> </u>		······································	WME	BO A'A'	2822 San Pedro (Hills of San Jose)
La:3-00:8	200	CUL	515	M-TH L	FН	AVITOAD CONTOURNAY
				-HT-M	FH	R Ground Squirel
51:8-01:8-0	CERLO-	m	515	D I.	BO	Riveria at boat deck
QE:6-58:6		2772	515	T/F /.	EH	X Success Drive
V00 200						:leitzubril X
55:6-05:6	0201	GIT	7.1	I/F 1'7	ЕH	XEast Bay
0:01-55:1	10001	- Jin	71	21/ JL	FH	Aristocrate Drive
50:01:00:01	0001	Gr		4,7 J/L	FH	K Central Park Avenue
00:01-01:0	1 Ogar	GA		T/F /.O	FH	- Cimineron
51:5- 21:5	Dasi	Sn)		1/F 1/D	<u>HH</u>	A Lake Haven Drive & Haden
5/15 41.0	1 <del></del>					K Compy Place:
			KINCK)	প ব	EH	X Forestedge
·	<u></u>		(734A	-	EH	Wyndree & Hooversham
555-91.6	JOOCT	OT	- 47.	h'/ a	BO	X Stroud Court
00:6-51;6	1005	TN	51	HI a	EH	X Strond & Dawsbury
50:5-00:5		Cil	2.1	E. I. T	FH	X Daleside
20:6-55:8	tac	CUR	<u></u>	7.1 T/T	FH	₩ 1050 Trafaleer
0.6 350		<u>(· · v</u>	· · · · · · · · · · · · · · · · · · ·	- HL/W	FH	X Chelmam
01.B-Ch.9	toot		0.6	1. C I	EH .	KIAAI Haverhill
05:8-51.8	1442	1.1	<u> </u>	HL/W	BO	Myndham X
Qh:8-00:3	10000	art	91	<u>, , a</u>	FH	א Davenport & Mitchell Blvd,
·	HSATI	COLOR	UT UT	DONE CT	LYPE	-ADDRESS
1.000		LAATZ	JSOTO LAV.	LS SXVA		
A						-

FLUSH SCHEDULE

THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!! NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING

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B=BlackO=Odor A=Air/Milky

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C=Clear Y=Yellow

FH=Fire Hydrant BO=Blow Off

PATE: 10-22-99

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#### FLUSH SCHEDULE

	ADDRESS	TYPE	DAYS DONE	START CLOSE CL/2 CL/2	START COLOR	GAL'S
<u> </u>	Davenport & Mitchell Blvd.	FH	D	1.0 1.8	CL,	1500 9:10-9:30
	Wyndham	BO	M/TH	1.8 1.9	Cu	500 9:35-9:40
	1441 Haverhill	FH		2.0 2.0	CL.	300 9.40-943
	Chelmam	FH	M/TH	9 2.0	4upu	<u>300 9:40 943</u> 500 9:45-9:50
/	1050 Trafalger	FH	T/F -			
	Daleside	FH	T/F ·			
~ <del>```</del>	Stroud & Dawsbury	FH	D .	le 1.5	Cil.	2000 A:55-10:15 1000 10:00-10:10
	Stroud Court	BO	D .2	5 1.5	CLK	1000 10:00-10:10
	Wyndtree & Hooversham	FH	M/TH	- BROKEN		
×	Forestedge	FH	D	- BROKEN	· · · · · · · · · · · · · · · · · · ·	
	Country Place:				·	
	Lake Haven Drive & Haden	FH	T/F			
	Cimmeron	FH	T/F			
	Central Park Avenue	FH	T/F			·
	Aristocrate Drive	FH	<u>T/F</u>			
	East Bay	FH	T/F			·
	Industrial: G.B.					
	Success Drive	FH	T/F /	D 2.D	CLL	1000
<del>X</del>	Riveria at boat deck	BO	D	1.7	CUR. (2)	95940)
	Ground Squirrel	FH	M-TH			
—	Arborerum CAPTIVA	FH	M-TH		Cik.	500
	2822 San Pedro (Hills of San Jose)		MWF -			
-	Tori Couri V.V.	BQ	TT			
~	4540 Rowan Road SHELL	FH	TH	·	·	
	Akuri	BO	MWF .		0 /	
<del>∦</del> ′	ALMOND WOOD	-	D	le 1.10	Cil,	3000 10:30-11:00
	Harrow Place Herrace	FH	<u>D</u>		·····	
		<u>FH</u>	TT		······	
17		BO	MWF -	2 0	V	
H	Wood Bend	<u>FH</u>	<u>TH /</u>	5 18	- Xilow	500 11:30-11:40
-	DATE: <u>10-21-99</u>		NAME:	your M	. Kobinon	<u></u>
	FH=Fire Hydrant BO=Blow Off					
	C=Clear Y=Yellow B=Black	O=Odor	A=Air/N	lilky		

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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#### FLUSH SCHEDULE

ADDRESS	TYPE	DAYS START DONE CL/2		START COLOR	GAL'S FLUSH
- Davenport & Mitchell Blvd.	FH		20	<u>у</u>	1500
— Wyndham	BO	M/TH97./ 0	7.1 7.2	_ <u>C</u>	300
- 1441 Haverhill	FH	D 2.0 0	7.2		300
- Chelmam	FH		2.1	<u>y</u>	400
1050 Trafalger	FH	T/F	-	<u> </u>	
Daleside	FH	T/F -	-	~_	
- Stroud & Dawsbury	FH	D 1.0 2	⁷ .2	C	800
- Stroud Court	BO	D 17 V	7.1	Ċ	500
Wyndtree & Hooversham	FH	MTH BROKE	N.		
Forestedge	FH	D BROK			
Country Place:					
Lake Haven Drive & Haden	FH	TAR			
Cimmeron	FH	T/F			
Central Park Avenue	FH	T/F			
Aristocrate Drive	FH	T/F			
East Bay	FH	T/F			
Industrial:					
Success Drive	FH	DF J.D 0	2.0	<u> </u>	100
- Riveria at boat deck	BO	D.7 J	. 8	C -,	313590 -
- Ground Squirrel	FH	M-TH/. (* /	10	0	and
- Arborerum CAPTINA	FH	M-TH . Lo	1,5	C	LADOD
- 2822 San Pedro (Hills of San Jose)	BO	MWF . 4 /	5	C	1000
Tori Court	BQ	TT <u>-</u>			
4540 Rowan Road	FH	тн —			
- Akuri	BO	MWF 1.3	1.5	C	500
-	• •	<b>-</b>		·	
- Harrow Place	FH	D . 5 /	. 5	C ,	2500
Severn Place	FH	TT			
- Villa Entrada	BQ	MWF .4 1	.5	C	1500
Wood Bend	FH	TH -	ham.		
DATE: 11-1-99		NAME: UNDA	1 Robins	<u>en</u>	·
FH=Fire Hydrant BO=Blow Off C=Clear Y=Yellow B=Black	O=Odo	A=Air/Milky			

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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### FOX HOLLOW FLUSH SCHEDULE

•		DAYS START CLOSE	START	GAL'S	
ADDRESS	TYPE	DONE CL/2 CL/2	COLOR	<u>FLUSH</u>	
		1	<u>_</u>	200	
- 8838 Belmeadow	<u>FH</u>	MWF 2.0 2.0	<u> </u>	200	
- 9129 Callaway	FH	MWF J.D 2.D	<u> </u>	200	
- <u>2356 Troski</u>	FH	MWF 1.5 2.0	C	300	
-Bonnington & Hominy	FH	MWF 20 2.0	C	300	
Spottswood	FH	WF			
- Hagen Drive	BO	MWF 1.0 2.0	<u> </u>	500	
- Ventura	FH	MWF 18 2.0	<u> </u>	100	
- Balsaridge	FH	MWF 2.8 28	<u> </u>	200	
FOXWOOD:				· · · ·	
Terilind	FH	W/F			
Cross Vine	FH	W/F		~	
- Daylilly	FH	MWF. 3.0 30	<u> </u>	300	
WYNDGATE:				<u> </u>	
- Courtlia	FH	MWF /. / /.8	Y	1000	-2- 11. NO.
- Craighurst	FH	MWF 1.0 1.6	Y	1000 - ¥	FIRE HYDRAWT
- Orchard Grove	FH	MWF 1.D 1.6	<u>´C</u>	300	moves/5min.
Heritage Springs:					FLUSH W/ MUD
- Almond Wood		MOF 3.5 3.5	C	500	

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FH=Fire Hydrant BO=Blow Off D=Daily

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C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

NAME: GVORA & Robinston DATE: 11-1-99

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### LHKONCH ILII CONLYCL SNDEKNISOK IE KON CYNL CEL IL CTEYKII NO HKDKYNL OK BTOM OLE MITT BE LNKNED OLE MILH YNK DISCOTOKED MYLEK COWINC

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		£	yliM\uA=A 10	vpO=O서	
		$\cap$			FH=Fire Hydram BO=Blow Off
	al de la colorada	Aread			69.1.1. H. STA
0007	<u> </u>	7.7	ET HI	EH	
			MWF	BQ	Villa Entrada
······································	· · · · · · · · · · · · · · · · · · ·		LL	НЧ	Severn Place
	·····		D	H.	Harrow Place
			WME	BQ	und A
205	2 2	5.7	8 HL	<u><u> </u></u>	4540 Rowan Road
000			S II	BO	- Tori Court
			MME		2822 San Pedro (Hills of San Jose
			HT-M	FH	Αιδοιείνα
	· · · · · · · · · · · · · · · · · · ·	<u> </u>	HT-M	FH	Ground Squirel
		<u></u>	D	BQ	Riveria at boat deck
			T/F	FH	Success Drive
	<u></u>				Industrial:
			T/F	FH	East Bay
· ·			T/F	FH	Arizoctale Drive
			-1/F	HT	Central Park Avenue
			7/1	H	Cimmeron
			T/F	FH	Lake Haven Drive & Haden
					Country Place:
	· · · · · · · · · · · · · · · · · · ·	Harrison	D	FH	Forestedge
			HLL/W	FH	Wyndree & Hooversham
			D	BO	Strond Court
	· · · · · · · · · · · · · · · · · · ·		D	FH	Strond & Dawsbury
	······································		T/F	НЧ	Daleside
			T/F	ਸਤ	1050 Тта विदित्त
	······		HT\14	EH	Chelmam
			D	НŦ	1441 Haverhill
			HT\M	BO	. msdbarw
	<u></u>		D	ਸਤ	Davenpor & Mirchell Blvd.

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FLUSH SCHEDULE

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#### FLUSH SCHEDULE

ADDRESS	TYPE	DAYS STAR DONE CL/2	T CLOSE CL/2	START COLOR	GAL'S
APDRESS					
Davenport & Mitchell Blvd.	FH	D /.C	20	<u>C</u>	1700
Wyndham	BO	M/TH			20.4
1441 Haverhill	FH	D 1.D	1.5		300
Cheimam	FH	M/TH	<u> </u>		
- 1050 Trafalger	FH	T/F 1.5	1.5	<u> </u>	200
Daleside	FH	T/F / 7	_1.5	<u>C</u>	500
- Stroud & Dawsbury	FH	D 1.2	1.5	<u> </u>	
- Stroud Court	BO	D 1.5	1.5		200
Wyndtree & Hooversham	FH	M/TH		·	
Forestedge BROKEN	FH	D	· • • • • • • • • • • • • • • • • • • •		
Country Place;				21	3.4 D
- Lake Haven Drive & Haden	FH	T/F / . D	1.4	<u> </u>	3000
- Cimmeron	FH	T/F .5	1.5		4500
- Central Park Avenue	FH	T/F 1.D	1.5		-100-
-Aristocrate Drive	FH	T/F 1.5	1.5	(×	_200_
-East Bay	FH	T/F / T	1.5	<u>xf</u> ′	900
Industrial:					(7)
-Success Drive	FH	T/F - 4	2D	<u>('</u>	900
Riveria at boat deck	BO	D . Lp		<u> </u>	3110570-
Ground Squirrel	FH	M-TH			
Arboretum	FH	M-TH			
- 2822 San Pedro (Hills of San Jose)	BO	MWF . 8	1.6		<u>IDO</u>
Tori Court	BO	TT			<u> </u>
4540 Rowan Road	FH	TH			
Akuri	BO	MWF 115	1.5	C	100
	•				- VA E
- Harrow Place	FH	D 1.3	1.3	<u>C</u>	200
Severn Place	FH				1500
- Villa Entrada	BO	MWF /	1.5	<u> </u>	1500
Wood Bend	FH	TH			······
DATE: 11-3/89	-	NAME:	I VORRE	Robins	2m
FH=Fire Hydrant BO=Blow Off C=Clear Y=Yellow B=Black	<o=odo< td=""><td>r A=Air/Milky</td><td></td><td></td><td></td></o=odo<>	r A=Air/Milky			

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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#### FOX HOLLOW FLUSH SCHEDULE

			CLOSE	START	GAL'S
ADDRESS	TYPE	DONE CL/2	CLA	COLOR	FLUSH
8929 Delmandouu	CU.		15	V	98D
8838 Belmeadow	FH	<u>MWF /.3</u>	1.0	<u>y</u>	
9129 Callaway	FH	MWF 1.0	-1.9	Y	1500
2356 Troski	FH	MWF - '7	1,5	· · · · ·	500
Bonnington & Hominy	FH	MWF / 5	5_	<u> </u>	200
Spottswood	FH	WF /.2	1.5	<u> </u>	400
Hagen Drive	BO	MWF 1.0	1.6	Ċ	1700
Ventura	FH	MWF 1.5	1.5	C	200
Balsaridge	FH	MWF 1.4	1.5	Ċ	200
FOXWOOD:					
Terilind	FH	W/F - 49	1.5	C	1500
Cross Vine	FH	W/F / 4	15	C	300
Daylilly	FH	MWF / 4	1.5	C	1000
WYNDGATE:			· · · · · ·		
Courtlia	FH	MWF 1.5	1.5	C	IDD
Craighurst	FH	MWF / 3	1.5%	en C	ADD.
Orchard Grove	FH	MWF /. 3	15	The second se	600
Heritage Springs:					
Almond Wood		MWF, 6	1.7		3000
					and the second se
FH=Fire Hydrant BO=Bl	ow Off	D=Daily			*
C=Clear Y=Yellow B=H	Black O=	=Odor A=Air/Mi	lky		
1 1					

DATE: 1/3/99

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NAME: (1000 100 mon

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### FLUSH SCHEDULE

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1				T CLOSE	START	GAL'S
ADDRESS	TYPE	DONE	CD2	<u>CL/2</u>	COLOR	FLUSH
A Devener & Mitchell Plud	FH	D	.8	11	C	1700
* Davenport & Mitchell Blvd.	BO	MTH	1.0	- Le	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	500
& Wyndham	FH	D	15	1.5	<u> </u>	300
1441 Haverhill	FH FH	M/TH	15	1.5		100
Chelmam		T/F	1	1.0	<u>¥</u>	100
1050 Trafalger	<u>FH</u>	the second s				
Daleside	<u>FH</u>	T/F		7.5	<u> </u>	300
* Stroud & Dawsbury	FH	D /		<u> </u>		
E Stroud Court	BO	<u>D</u>	le	1.10		JOD
* Wyndree & Hooversham BKDKCh	JFH	M/TH				
*Forestedge BRDKPA)	FH	D				
Country Place:				· · · · · · · · · · · · · · · · · · ·		
Lake Haven Drive & Haden	FH				-	
Cimmeron	FH	T/F	•		~	
Central Park Avenue	FH	T/F	~	·····		
Aristocrate Drive	FH	T/F				······································
East Bay	FH	T/F			- <u></u> -	
Industrial:						
X Success Drive	FH	<b>T</b> F	.8	2.0	<u>C</u>	500
K Riveria at boat deck	BQ	D	1.5		C -03	70000-
- Ground Squirrel	FH	M-TH	1,3	1.5	C	500
- Arboretum - CAPTIVA	FH	M-TH	1.8	1.8	Ċ	1.000
- 2822 San Pedro (Hills of San Jose)	BO	MWF	.9	1.10	C	:300
Tori Court	BO	TT	-			
4540 Rowan Road	FH	TH				
- Akuri	BQ	MWF	1.7	1.3	C	1000
- Harrow Place	FH	D	1.1	1.5	V.	2500
Severn Place	FH	TT				
- Villa Entrada	BO	MWF	H	1.5	V	2000
Wood Bend	FH	TH	<u> </u>			
			11	A	$\overline{\partial}$	
DATE: 11-8-99		NAME	· Lin	DARO	Kohora	n
MachAV	-	/	eq.	An <u>n(C</u>		
MONDAY FH=Fire Hydrant BO=Blow Off		(				
C=Clear Y=Yellow B=Black	kO=Odo	r A=Air	Mille			
		-		DATE AND DE	COLORED WAT	EP COMINC

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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### FOX HOLLOW FLUSH SCHEDULE

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		DAYS	START	CLOSE	START	GAL'S
ADDRESS	<u>TYPE</u>	DONE	CL/2	CL/2.	COLOR	<u>FLUSH</u>
8838 Belmeadow	<u>FH</u>	MWF				
- 9129 Callaway	FH	MWF				
- <u>2356 Troski</u>	FH	MWF				
- Bonnington & Hominy	_FH	MWF			·····	
- Spottswood	_FH	WF				
- <u>Hagen Drive</u>	BO	MWF			·	
-Ventura	FH	MWF				
- Balsaridge	FH	MWF				
FOXWOOD:						
Terilind	FH	W/F				· · ·
Cross Vine	FH	W/F				
- Daylilly	FH	MWF				
WYNDGATE:						
- Courtlia	FH	MWF	11	1.5	C	500 July
Craighurst	_FH	MWF	1.1-	1.5	<u> </u>	300 UM
- Orchard Grove	FH	MWF	fiz_	1.6	C	1500 ym
Heritage Springs:						
-Almond Wood		MWF		, B	(	36000
FH=Fire Hydrant BO=Bl	ow Off	D=Dail	y	04	AY PER TONY	
C=Clear Y=Yellow B=I	Black O	=Odor A	A=Air/Mil	ky N	$\cap$	
DATE: 11-8-99 MOWAY		-	NAME:	You	ohotingon/	
1				$\bigcirc$	(	

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#### FLUSH SCHEDULE

•	ΤΥΡΕ	DAYS START CLOSE DONE CL/2 CL/2	START COLOR	GAL'S
ADDRESS	TIFE	DONE CDI CDI	<u>cobon</u>	
Q -Davenport & Mitchell Blvd.	FH	D.5 1.5	C	1500
Wyndham	BO	M/TH	C	200
3 -1441 Haverhill	FH	D 1.6 1.6		$-\chi \omega$
Chelmam	FH	M/TH		(TI)
1050 Trafalger</td <td>FH</td> <td>T/F 1.0 1.5</td> <td></td> <td>500</td>	FH	T/F 1.0 1.5		500
Dutuda	FH	T/F 1.5 1.5	C	.300
6 - Stroud & Dawsbury	FH	D.9 1.4	<u> </u>	800
-Stroud Court	BQ	D 1.4 1.10	<u>C</u>	(300)
Wyndree & Hooversham ER	DKAFH	M/TH		
Forestedge BRDI	40 \FH	D		
Country Place:				
Courte y Hate.	FH	T/F 1.4 2.D	У.,	PODDX
9 - Lake Haven Drive & Haden	FH	T/F 13 2.0	V	800
13- <u>Cimmeron</u>	FH	T/F 20 20	74	.300
12- Central Park Avenue	FH	T/F 2.0 2.0	N	1000 .
Jo-Aristocrate Drive	FH	T/F 2.0 2.0	1/ .	10DO
// East Bay	<u></u> <u></u>			
Industrial:	FH	DF 1.10 1.10	(i	200
8 Success Drive	and the second se	D 4 1.5	C-36	21240-
/- Riveria at boat deck	BO			
Ground Squirrel	FH	M-TH	0	1000
18-ATTOFERIM CAPTINA	FH	<u>M-TH / D / 3</u>		1000
2822 San Pedro (Hills of San	Jose) BO	MWF . 4 1.7	<u>v</u>	400
110- Tori Court	<u>BO</u>	<u>TT9_/.5</u>		800
4540 Rowan Road	FH	TH 1.0 1.5		7)00
Akuri	BO	MWF		1500
8- FILMONDWOOD_	F4+	Doldo	<u>C</u>	
15- Harrow Place	FH	D 1.0 1.5	(	1000
14 - Severn Place	FH	TT 9 1.7	Ċ	700_
Villa Entrada	BQ	MWF		TOOK
- Wood Bend	FH	TH 9 1.6	<u> </u>	3000 TOOK
DATE: 11/9/99		NAME: GVOLLO RE	binnen	
TUPSDAV				
FH=Fire Hydrant BO=Blow (	าก			
C=Clear Y=Yellow B=	BlackO=Od	or A=Air/Milky		

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

R pellavish water from hydrant, flushed 20 min. per Jony. Did not clean. Advised by Jony to goto hose bit at well. water still yellowish w/ Small particles in water. Same at all hydrants. Jony. Daid to check friday for next schedule to see if still discolored

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### FOX HOLLOW FLUSH SCHEDULE

ADDRESS	TYPE	DAYS START CLOSE DONE CL/2 CL/2	START COLOR	GAL'S FLUSH
ADDRESS Slo 8838 Belmeadow J5 - 9129 Callaway J4 - 2356 Troski S3 - Bonnington & Hominy S3 - Spottswood J1 - Hagen Drive J0 - Ventura M - Balsaridge FOXWOOD:	FH FH FH FH BO FH FH FH	MWF 1.0 1.5 MWF 1.0, Q.0 MWF 1.4 2.0 MWF 1.5 1.5 WF 1.4 1.5 WF 1.4 1.5 MWF .9 1.5 MWF .9 1.5 MWF .9 1.5	C C C C C V V	900 300 300 1000 2000 2000 300
ノム – <u>Terilind</u> ノク – <u>Cross Vine</u> ノタ – <u>Daylilly</u> WYNDGATE:	FH FH FH	W/F 4 1,8 W/F 1.4 1.5 MWF 1.6 1.10		9000 200 300
7 — <u>Courtlia</u> 8 — <u>Craighurst</u> 6 — <u>Orchard Grove</u>	FH FH FH	MWF 1.0 1.5 MWF 1.1 1.5 MWF .4 1.5	E	1000 9:50 1000 2000 9:45
Heritage Springs: 75-Almond Wood - HILLS DF SAW - FH=Fire Hydrant BO=BI	TDSE ow Off	MWF. 6 1.5 D=Daily	Ċ	2500 1600
C=Clear Y=Yellow B=F DATE: <u>11-10-99</u> Webwest		=Odor A=Air/Milky NAME:	Rotinso	2
PEACIFICAE SLBE FOXHOLLOW BOUNINGTON 2	1			
STORM DRAIN	1 1			

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### FLUSH SCHEDULE

ADDRESS	TYPE	DAYS START DONE CL/2	CLOSE CL⁄2	START COLOR	GAL'S
- Davenport & Mitchell Blvd.	FH	D	2.0	C	1500
Wyndham	BO	M/TH			10-0
- 1441 Haverhill	FH	D 2.2	1.2	0	an
Chelmam	FH	M/TH			
1050 Trafalger	FH	T/F			
Daleside	FH	T/F			
-Stroud & Dawsbury	FH	D .3	1.9	C	1300
5 - Stroud Court	BO	D.5	2.1	$\mathcal{C}$	1000
Wyndtree & Hooversham BROKEN	FH	M/TH	0		
Forestedge FREKEN		D			
Country Place;					
Lake Haven Drive & Haden	FH	T/F			
Cimmeron	FH	T/F			
Central Park Avenue	FH	T/F 😁			
Aristocrate Drive	FH	. T/F			
East Bay	FH	T/F	**		
Industrial:					
Success Drive	FH	THE 1.5	1.5	0	200
- Riveria at boat deck	BO	D 1.6	1.14	Č - 3	ZZORD-
Ground Squirrel	FH	M-TH 1.9	1.9	Ċ	ADD
4-Arbonenum- CAPTIVA	FH	M-TH 1.5	1.5	C	TODDI
3-2822 San Pedro (Hills of San Jose)	BQ	MWF Per	FORMED TE	ST ON 11/9	1/99
Tori Court	BQ	TT			
4540 Rowan Road	FH	ТН			
2-Akuri	BO	MWF 1.5	1.5	C	200
	• •				
Harrow Place	FH	D : 4 /	.5	C	2500
Severn Place	FH	TT			
O- Villa Entrada	BO	MWF 1.5 /	7		202
Wood Bend	FH	<u></u>	·	-	
DATE: 11-10-99		NAME: UN	che R	opison	
WEDNESDAY		$\langle \rangle$	- 1		
FH=Fire Hydrant BO=Blow Off					
C=Clear Y=Yellow B=Black	O=Odor	A=Air/Milk			

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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#11 STARTED OUT, 9 / AFTER FLUSH FOR 10 MIN. BROPPED TO, 5 STAYED, 5 FOR 5 MIN. / AFTER 25 MIN. 1.5

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### FLUSH SCHEDULE

			120.	511 5011				;
	ADDRESS	TYPE		START CL/2	CLOSE CL/2	START COLOR	GAL'S 'S FLUSH	<b>F</b>
9-	- <u>Davenport &amp; Mitchell Blvd.</u> - <u>Wyndham</u>	FH BO	D M/TH	1.D	2.0	<u>A</u>	1500 300	•
	- 1441 Haverhill - Chelmam 1050 Trafalger	FH FH FH	M/TH T/F	2.0	1.8	<u> </u>	300	
	Daleside Stroud & Dawsbury Stroud Court	FH FH BO	T/F D / D /	1.0	1.9 2.8	C C	500 1000	
	Wyndtree & Hooversham BKOKEA Forestedge BKOKEA Country Place:	<u>SFH</u> FH	M/TH D			· · · · · · · · · · · · · · · · · · ·		
	Lake Haven Drive & Haden Cimmeron Central Park Avenue	FH FH FH	T/F T/F T/F					
	Aristocrate Drive East Bay Industrial:	FH FH	T/F T/F					
1-	- Success Drive Riveria at boat deck Ground Squirrel	FH BO FH	D M-TH	3 / .le /.	5  e	<u> </u>	<u>300</u> 22340- 300	
10-	Astoretum CAPTIVA 2822 San Pedro (Hills of San Jose)	FH	M-TH MWF TT	2.0 0	2.0 2.0	C V	1000 300	pulles An
13-	- Tori Court - 4540 Rowan Road Akuri	FH BQ FH	TH . MWF		1.3		1000 +	PER JACK DO ALDHA
-	- ALMONDNDODD Harrow Place - Severn Place	FH FH	D TT					
	Villa Entrada - Wood Bend il II QQ	BQ FH	MWF TH	<u> </u>		n P i m		
	DATE: <u>11 - 11 - 99</u> THURSDAV FH=Fire Hydrani BO=Blow Off C=Clear Y=Yellow B=Black	- kO=Odo	NAME: r A=Air/l	$\bigcirc$	)	11. 100010		//
	NO HYDRANT OR BLOW OFF THROUGH IT!! CONTACT SUI	WILL B. PERVIS	E TURNI OR IF YO	ED OFF OU CAN	WITH ANY . "T GET IT C	DISCOLORED WA LEARII		
							GET	DNE
						Per =	FACK	

ON ALDHA SIDE FOR P. W.

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DAYS STAL DONE CL/2 D .9 M/TH D /.3 M/TH T/F /.3 D /.0 D /.4 M/TH D T/F /.3 T/F T/F T/F		START COLOR C C C C C C C	GAL'S <u>FLUSH</u> <u>2000</u> <u>400</u> <u>300</u> <u>400</u> <u>500</u> <u>1000</u>
D .9 M/TH D /.3 M/TH T/F /.2 D /.0 D /.4 M/TH D T/F /.3 T/F T/F T/F	1.7 1.8 1.7 1.6 1.5 1.4	C C C C C C	2000 400 300 400 600 500
M/TH D /.3 M/TH T/F /.7 T/F /.2 D /.0 D /.4 M/TH D T/F /.3 T/F T/F	1.8 1.7 1.6 1.5 1.4	C C	400 300 4015 600 500
D /.3 M/TH T/F /.7 T/F /.3 D /.0 D /.4 M/TH D T/F /.3 T/F T/F	1.5	C C	300 401 600 500
M/TH T/F /. ? D /. D D /. D D /. 4 M/TH D T/F /. 3 T/F T/F	1.5	C C	300 401 600 500
T/F /. ? T/F /. ? D /. D D /. 4 M/TH D T/F /. 3 T/F T/F	1.5	C C	4015 600 500
T/F /.2 D /.D D /.4 M/TH D T/F /.3 T/F T/F	1.5	C C	4015 600 500
D 1.0 D 1.4 M/TH D T/F 1.3 T/F T/F	1.5	C	600 500
D4 M/TH D T/F3 T/F T/F			500
M/TH D T/F 1.3 T/F T/F		C	
D T/F T/F T/F	j.4	C	1000
Т/F <b>/</b> .3 Т/F Т/F	j.le	C	1000
T/F T/F	j.Le	C	1000
T/F T/F	j.le	C	1000
T/F T/F			
T/F			/
1/ <b>r</b>			\ \
the second s			, <i>y</i>
THE .J	1.4	C.	5012
	1.10	C = Oi	322420-
			100400
	1.5	1	300
		مى كەربىي كەربىيە مەربىيە	
			· · · · · · · · · · · · · · · · · · ·
	15	0	500
Inter Ind			
D 1.1	15	Λ	2500
	- Andrews	land	<u> </u>
and the second sec	15	C	500
	18	V	1000
NAME:	loree M	Lating	
	T/F T/F . 5 D 1.1e M-TH M-TH M-TH MWF 1.0 TT TH MWF 1.2 D 1.1 TT MWF 1.2 TH MWF 1.2 II MWF 1.2 II 10	T/F $T/F$ $T/F$ $T/F$ $T/F$ $T/F$ $D 1.1e 1.1e$ $M-TH$ $M-TH$ $MWF 1.0 1.5$ $TT$ $TH$ $MWF 1.2 1.5$ $D 1.1 1.5$ $TT$ $MWF 1.2 1.5$	$\begin{array}{c} T/F \\ T/F \\ T/F \\ \hline D \\ D \\ I \cdot Le \\ C \\ - O_{1} \\ \hline C \\ \hline T \\ \hline T \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ I \cdot 2 \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ I \cdot 2 \\ \hline C \\ \hline T \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ I \cdot 2 \\ \hline C \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ I \cdot 2 \\ \hline C \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ I \cdot 2 \\ \hline C \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ I \cdot 2 \\ \hline C \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ I \cdot 2 \\ \hline C \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ I \cdot 2 \\ \hline C \\ \hline C \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ \hline C \\ \hline C \\ \hline C \\ \hline T \\ \hline MWF \\ I \cdot 2 \\ \hline C $

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH ITI! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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Docket No. 010503-WU Exhibit VAK-19 Page 44 of 60

### FOX HOLLOW FLUSH SCHEDULE

ADDRESS	TYPE	DAYS STAR DONE CL/2	T CLOSE	START	GAL'S
<u>/////////////////////////////////////</u>	TIFE	DUNE CD1	<u>CL/2</u>	COLOR	FLUSH
8838 Belmeadow	FH	MWF			
9129 Callaway	FH	MWF 8	1.5	C	800
2356 Troski	FH	MWF /	14	Č.	1 m
Bonnington & Hominy	FH	MWF .7	1.5	Ċ,	300
Spottswood	FH	WF 1.0	1. Le	Č	(aDD)
Hagen Drive	BO	MWF 7	1.5	C.	2000
Ventura	FH	MWF . 9	1.5		900
Balsaridge	FH	MWF /./	1.5	W	700
FOXWOOD:					
Terilind	FH	W/F ,4	1.5	C	9000
Cross Vine	FH	W/F , Le	1.5	0	300
Daylilly	FH	MWF , 10	1.1.	C	1,000
WYNDGATE:					10000
Courtlia	FH	MWF 1.8	1.8	0	300
Craighurst	FH	MWF / 9	Z.D	C	300
Orchard Grove	FH	MWF J.D	20	C	1000 9:0
Heritage Springs:					
Almond Wood		MWF . 4	1.6	С	2500

FH=Fire Hydrant BO=Blow Off D=Daily

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C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

DATE: <u>11-12-99</u> 7RIDAY

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NAME: World Kobingon

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Docket No. 010503-WU Exhibit VAK-19 Page 45 of 60

### FLUSH SCHEDULE

.

		DAYS	START	CLOSE	START	GAL'S
ADDRESS	TYPE	DONE	СГЛ	CL/2	COLOR	FLUSH
	1.1	D	a	19	1:-0	2500
Davenport & Mitchell Blvd.	<u> </u>	M/TH _C	10	1 1		Soo
Wyndham	FH	D	X.d	10	- 2/	200
1441 Haverhill	<u> </u>	M/TH		2.0	11/	200
Chelmam	<u> </u>	T/F	<u>.7</u>	-d-1	<u></u>	
1050 Trafalger	Contraction of the local division of the loc	<u>T/F</u> ~				
Daleside	<u>FH</u>		7			2000
Stroud & Dawsbury	<u>FH</u>	<u>D</u> .	<del></del>	1.10		<u></u>
Stroud Court	BO	D	Ź	1.8	<u>(:</u>	<u> </u>
Wyndtree & Hooversham BRok	ED FH	MITA				
	(en)FH	D				
Country Place:						······
Lake Haven Drive & Haden	<u> </u>	T/F	<u> </u>		<u> </u>	
Cimmeron	FH	T/F		<u> </u>		
Central Park Avenue	FH	T/F		<u> </u>		
Aristocrate Drive	FH	T/F				<u>.</u>
East Bay	FH	T/F			<u> </u>	
Industrial:						
Success Drive	FH	<b>D</b>	1.5			<u>10D</u>
Riveria at boat deck	BO	<u>D</u>	2.0	J.Q.	<u> </u>	3264215
Ground Squirrel	FH	M-TH	12		Ć	300
Arborenun CAPTIVA	BDR	M-TH	.9		<u>C</u>	500
2822 San Pedro (Hills of San Jo	ose) BO	MWF	1.10	lila	C	120
Tori Court	BO	TT				
4540 Rowan Road	FH	ТН				
Akuri	BO	MWF	1.7	1.7	<u> </u>	200
Нагтоw Place	FH	D .	le	1.5	<i>Y</i>	
Severn Place	FH	TT				
-Villa Entrada	BO	MWF	1.2	1.8	¥	_/DD()
Wood Bend	FH	TH				
DATE: 11-15-99 MONSAV		NAME	: Úxe	PRAR M.	Robinson	L
FH=Fire Hydrant BO=Blow Of	T					
C=Clear Y=Yellow B=E	llackO=Odd	∧riA=Air/	Milky			

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH ITIL CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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PATE: 11-15-29

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C=Clear Y=Yellow B=Black O=Odor A=Au/Milky

FH=Fire Hydrant BO=Blow Off D=Daily

	2000		EI CO	MWF /		booW bromIA
C	)	· · · · · · · · · · · · · · · · · · ·				Heritage Springs:
-mX	1 22520	Ð	51 8	MWF .	НЭ	Orchard Grove
-Guilt	1005.	7	51 0'	MWF	EH	Craighwst
Lint	10001	Ð	1'/ F	<b>WWF</b>	НЧ	Georgia Courtia
<i>θ</i>						WYNDGATE:
	2001	<u></u>	51 91	MWF	FH	VIIIIY
	2091	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	91 60	M\E (	FH	Cross Vine
	NOOD	$\overline{\mathbf{\cdot}}$	51 7:0	M/F (	FH	Terilind IECRALYN
			· · · · · · · · · · · · · · · · · · ·			FOXWOOD:
	020/	$\sim$	S! L'	MMF 2	FH	Balsaridge
	7991	S	51 30	MWF 2	FH	Verime VENTURI
	$\infty 2/$	3	21 E	MWF A	BO	Hagen Drive
				ME	FH	DOOWSTIODS
				MME	FH	Bonnington & Hominy
				WWF	FH	2356 Troski 18541
				MME	Н٦	9129 Callaway
				MWF	EH	8838 Belmeadow
	HSNII	COLOR	CL73 _ CL73	DONE	LYPE	VDDKE22
	SI TV9	TAM I S	SLART CLOSE	SXVA		

FOX HOLLOW FLUSH SCHEDULE

	WATER COMING	CLEVEII DISCOLORED	INA HTTU 77		2	THROUGH ITLI CONTAC NO HYDRANT OR BLOW C=Clear Y=Yellow B	
	Jim			vµiMıiA=A robC	)=()≯วะเย=	FH=Fire Hydrant BO=Blow	
•				Ň	10		-
				1)		DATE: 11-110-11	
			1-11-013	NT : JWYN		PATE: 11-110-99	
		- voor y	* W	Y/		Wood Bend	
		· [	2	HL	HI	epenug elliv	
				WME	BQ	Severn Place	
					HJ	Harrow Place	
	ROF	A	8.5-	87 II 0	НJ		
	actor	D		- <del>.</del>		And in the	
	0058	0	41	MWF	BO	PEON UEMON 0757	
	0000			HL	HT	Tori Court	
· · ·					BO	1 0 m 1 UPS 7787	
$(x_{i}) \in \mathcal{F}_{i}(Y_{i})$		-	61	WME -	<u>08()</u>	2822 San Pedro (Hills of San	
	COL			HI-W	H-I	Cround Squirel	
	· · · · · · · · · · · · · · · · · · ·				HJ	Riveria at boat deck	
		2	51	0 P C	BO	K Success Drive	
	- CVC		9.0	17 J	H	Isiuzuhal:	
	-001804	0-0-	71	97 JUL		K East Bay	
	TOE			11 110	HI	K LOL Bay	
· ·		w-//	0,1		H	A ALISTOCIALE DIVE	
the state of the s	QUE	wo	51	Lit Jil	HH	K Cintral Park Avenue	1
Leve.	ap	WD	57	7.1 T/T			1
N.	44			1/F //	HI .	Lake Haven Drive & Haden	
	0007		- 57	L/F 1,1		2061 440.00	
	1007	Ur-/			HIN	1016216986 E	1.0
1 - N				D			4
				HLIM	BO		1
	\			0/0	HI -	Amasmed & Dawsbury	
	TOST	2	07.1	\$7 Q		K Daleside	1
i.	-0001	V		T/F 18	HI	1050 Tagle 1020	<b>f</b>
	QUE			[/E - 1/1	HJ	Chelmam	1
	-908'	<u> </u>		HL/W	H	Ilidery Haverhill	*
				1°20 a	H	msdbay W	
	208	2		HI/W	BO	Davenport & Mitchell Blvd.	₩ -
			-170	D 1.2	H-I		
	Tasi	$\overline{\boldsymbol{v}}$		· .		ADDRESS	
			2/12	DONE CLU	LYPE		
	7	COLOR	75073	TAATZ ZYAG	·		:
		TAATZ				· · · · · · · · · · · · · · · · · · ·	
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## FOX HOLLOW FLUSH SCHEDULE

ADDRESS	TYPE	DAYS START DONE CL/2	CLOSE CL/2	START COLOR	GAL'S FLUSH
8838 Belmeadow	FH	MWF /14	1.9	V	470
9129 Callaway	FH	MWF 18	1.8	17.	600
2356 Troski	FH	MWF / le	1.6	$\overline{N}$	201
Bonnington & Hominy	FH	MWF 7.3	1,8	Ÿ,	LDD
Spottswood	FH	WF / . 7	1.7	14	NON
Hagen Drive	BO	MWF 2	1.6	10	1500
Ventura	FH	MWF /. 3	1.7	C	500
Balsaridge	FH	MWF/.(	1.8	C	3DD
FOXWOOD:					
Terilind	FH	W/F 5	19	C	LODDD
Cross Vine	FH	W/F / 9	1.9	.0	300
Daylilly	FH	MWF / la	19	Ċ	ISDD
WYNDGATE:		/ 4	1		
Courtlia	FH	MWF 1.3	1.10	C	500
Craighurst	FH	MWF 1.6	1.10	Õ	300
Orchard Grove	FH	MWF 1.4	1.10	Ć	1700 9400
Heritage Springs:					
Almond Wood		MWF , Ø	1.7	Ċ	JOOD

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

DATE: 11-17-99 WEDNESDAY

NAME: Monce M. Kotinson

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#### FLUSH SCHEDULE

,						
•		DAYS	STAR	T CLOSE	START	GAL'S
ADDRESS '	TYPE	DONE	CL/2	CLA	COLOR	FLUSH
(mortage					•	15-15
X Davenport & Mitchell Blvd.	FH	D	1.0	1.8	C	1500
Wyndham	BO	M/TH				
A 1441 Haverhill	FH	D	1.9	1.9	<u>C</u>	300
Chelmam	FH	M/TH				
1050 Trafalger	FH	T/F				
Daleside	FH	T/F				
* Stroud & Dawsbury	FH	D	1.3		C	1500
le Stroud Court	BO	D	1.1	<u> </u>	C	17500 C. 11
Wynduree & Hooversham BROKE	OFH	M/TH			£200	
Forestedge BRDVE	FH_	D	960		, بالبينياني. 	·····
Country Place:						<u></u>
Lake Haven Drive & Haden	FH	T/F	$\geq$			
Cimmeron	FH	T/F				
Central Park Avenue	FH	T/F		$\leq$	·	
Aristocrate Drive	FH	T/F			<u> </u>	
East Bay	_FH	T/F				
Industrial:						2 700
K Success Drive	_FH	Ð.	1.9	1.7	(	7 300
KRiveria at boat deck	BO	D	1.0	1.5		C - 0330800-
Ar Ground Squirrel	FH	M-TH	1.8_	1.8		100
-ATOOTETUM CAPTIVA	FH	M-TH	-4-	<u>Į.X</u>	<u> </u>	- lego
# 2822 San Pedro (Hills of San Jose	) <u>BO</u>	MWF	1.7	<u> </u>		200
Tori Court	BO	TT				
4540 Rowan Road	FH	TH				201
Akuri	BO	MWF	1.6	1.10	<u> </u>	dou
· · · · · · · · · · · · · · · · · · ·	•	~		15		2502
Harrow Place	<u>FH</u>		1.0	<u>/.</u>		
Severn Place	FH	TT		7 14	C	1300
* Villa Entrada	BO	MWF	· ð	<u> </u>		
Wood Bend	<u>FH</u>	TH			~) -	
IL IN QQ		A7 / 3 / F	- 18	YOAAQ	Kahan	
DATE: 11-17-99	-	NAME	-4	NA ASL	1 JOURE AS	<u> </u>
WEDNESDAY			(			
FH=Fire Hydrant BO=Blow Off	kO=Odo		Mind			
C=Clear Y=Yellow B=Blac			тнику			

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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#### FLUSH SCHEDULE

		DAYS START CLOSE	START	GAL'S
ADDRESS	TYPE	DONE CL/2 CL/2	COLOR	FLUSH
		D / 8	ß	700.)
Davenport & Mitchell Blvd.	FH	2 14 1.0	<u> </u>	$\underline{\alpha}$
X Wyndham	BO	млн 2 2 7 3	<u> </u>	$-\alpha \rho \rho$
A 1441 Haverhill	FH	D 1.7 1.7	<u> </u>	
the Cheltnam	FH	M/TH /, 4 /, 8	/·	100 700
1050 Trafalger	FH	<u>T/F</u>		
Daleside	FH	<u>T/F</u>		12.02
Stroud & Dawsbury	FH	D /13 /.4		1000
E Stroud Court	BO	D 1.4 1.1e	L	_1000
Wyndree & Hooversham BKDHer	<u>SFH</u>	M/TH -		
Forestedge BRDNPA)	FH	D		
Country Place:				
Lake Haven Drive & Haden	FH	T/F		
Cimmeron	FH	T/F	. <u>.</u>	
Central Park Avenue	FH	T/F		
Aristocrate Drive	FH	T/F		······································
East Bay	FH	T/F		
Industrial:				16900
A Success Drive	FH	10 1.9 2.0	C	300 332870
* Riveria at boat deck	BO	D 1.4' 1.7	<u>C-0</u> :	32840- 249 770
Ground Squirrel	FH	M-THIB 1.4	<u>C</u>	2000
Arboretum CAPTIVA	FH	M-TH . 7 1. 5	C	600
2822 San Pedro (Hills of San Jose)	BO	MWF	<u> </u>	
Tori Court	BO	TT 1.0 1:10	V	300
4540 Rowan Road	FH	TH .6 15	Ŋ	2000
1 Akuri	BO	MWF	for	range fran
* ALMOND WOODS	FH	D 14 1.6	C	3000
Harrow Place	FH	D 10 1.5	C c	X300
Severn Place	FH	TT 1.8 1.8	Č	FX)
Villa Entrada	BO	MWF		
Wood Bend	FH	TH 1.4. 1.4	¥	1000 - TOOK 8 MIN.
DATE: <u>11 - 19 - 99</u> THURSDAY FH=Fire Hydrant BO=Blow Off		11	Robinson	TO GET WATE TO RUN CLEA

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

•	FLUSH SCHEDULE	Docket No. 0 Exhibit VAK- Page 51 of 60	19 <u>c</u>
		START	GAL'S
ADDRESS TYPE	DONE CL/2 CL/2	COLOR	FLUSH
- Davenport & Mitchell Blvd. FH	D .5 1.10	C	5000
Wyndham BO	м/тн —		
K1441 Haverhill FH	D 1.10 1.8	C	300
Chelmam FH	M/TH		
TTH × 1050 Trafalger FH	T/F 1.4 1.7	C	400
T. TH. A Daleside FH	T/F 1.15 1.10	· V	- MOD
X Stroud & Dawsbury FH	D .7 1.10	e	1000
* Stroud Court BO	DII	C	1500
Wyndree & Hooversham Parken FH	M/TH	-	
Forestedge BRDK9()FH	D		
Country Place:			· · · · · · · · · · · · · · · · · · ·
- Lake Haven Drive & Haden FH	T/F 1,1 ) 7	C-m	1500
- <u>Cimmeron</u> FH	T/F 12 1.5	C-m	_3000
Central Park Avenue FH	T/F 1.4 1.5	V-M	1000
-Aristocrate Drive FH	T/F I.O I.S	C -10	(000)
- East Bay FH	T/F 1.2 1 10	V-m	DOD
Industrial:		1	······································
- Success Drive FH	DF 1.10 1.10	C	JOD
# Riveria at boat deck BO	D 1.5 1.5	C -(	3341820-
Ground Squirrel FH	M-TH		
Arboretum FH	м-тн — —		
M.TH - 2822 San Pedro (Hills of San Jose) BO	MWF . 3 1. 7	C	500
Tori Court BO	TT	e	
4540 Rowan Road FH	TH		
T-T Akuri BO	MWF1.1 115	·	1500
-			
— <u>Натоw Place</u> FH	D 1.0 1.7	Ċ	2000
Severn Place FH	TT TT		
- Villa Entrada BO	MWF1.1 1.6	C	1000
Wood Bend FH	тн – –		
DATE: <u>11-19-99</u> FRIDAY FH=Fire Hydrant BO=Blow Off	NAME: Myong M	Robinsor	7-
C=Clear Y=Yellow B=BlackO=Odo	r A=Air/Milky		

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEARII

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## FOX HOLLOW FLUSH SCHEDULE

2221					
2221	<u> </u>	51	MWF 0.4		booW bromIA
	······································				Heriage Springs:
2021		SI	MWF U.J	FH	Orchard Grove
325		51	MWF O.M	EH	<u>temusien</u>
0009	V	5.1	MWF D.7	OS HE	Counting ( CALIFICAL
					WYNDGATE:
0001	2	54	MWF (, )	FH	VILINAG
QQQX	S.		M/F O.S	EH	Cross Vine
OCOX:		51	M/F D.3	НЧ	NKIUJJ PHILID
					EOXMOOD:
2021	<u> </u>	SF	MWF &'J	HH	Balsaridge
2207	?	5.1	MWF U.Z	FH	Haning Burney
			MWF	BO	Hagen Drive
			MŁ	FH	poonshods
			MME	EH	Romington & Hominrol
			WMŁ	FH	2356 Tanki 105K1
			MWF	FH	0129 Callaway
			MWF	FH	wobsamlag 8588
HSATL	COTOS	100	100 0.100		·
SITYS			DONE CTV	IYPE	SSERUTY
5/1/5	TAATZ	IL CTORE	YVLS SXVA		

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

NAME: 1

66/61/11 DATE: _

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C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

## FH=Fire Hydrant BO=Blow Off D=Daily

2021		±'1	MWF D.4	HH	booW bnomIA
	<u>2</u>				Heritage Springs:
9001		51	WAL D'Z	НЭ	Orchard Grove
000	<u> </u>	5.1	MWF CVS	ΗJ	Craighurst
0051	.)	2.1	WAL O'S	ĿН	Courtie Partie Alt
	·····				WYNDGATE:
0051	<u> </u>	5.1	WME 1.0	ĿН	Vililys
0051		5.1	ML V.	FH	Cross Vine
9001	7	<u> </u>	M/E I'Q	Н٦	NYJA2231 BrillingT
					FOXWOOD:
0.091	$\sim$	5.1	WAL 1'C	FH	Balsaridge
000	0	51	WME ("P	FH	NONTWAY RUTTUR
<u>200</u>	3	51	MWF C'C	BO	Hagen Drive
TVUS	<u>``</u>	51	ME 1'5	HH	boowshods
2001	$\overline{\mathbf{O}}$	51	WWF 1.2	FH	vnimoH & norgninnoB
205	$\overline{\mathcal{D}}$	57	WME /'2	FH	NSQF 19502 9562
ODE	3	51	WME Q'Z	FH	9129 Callaway
225	$\overline{\mathcal{A}}$	51	R.B. TWM	FH	8838 Beimeadow
HSATH	COLOR	CTJ	DONE CL/Z	LYPE	AD RESS
S.TV9	<i>TA</i> MT2	SOTO	TAATS START		

#### EOX HOTTOM ETASH SCHEDATE

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#### FLUSH SCHEDULE

ADDRESS	TYPE	DAYS STAR DONE CL/2	T CLOSE CL/2	START COLOR	GAL'S
- Davenport & Mitchell Blvd,	FH	D 12	1.8	U	2500
- Wyndham	BO	M/TH 1.4	1.3	7	300
- 1441 Haverhill	FH	D 1.7	12	U	300
- Chelmam	FH	M/TH /, 7	1.2	IT-D	300
1050 Trafalger	FH	T/TH 1.6	1.10	C	400
Daleside	FH	T/TH / G	1.10	· U	300)
- Stroud & Dawsbury	FH	D 12	110	- Pi	1200
- Stroud Court	BO	D /1/	1.15	5	1000
Wyndtree & Hooversham	FH	BROKEN -		~	
Forestedge	FH	BROKEN -		_	
Country Place:					<u> </u>
- Lake Haven Drive & Haden	FH	T/F 1.3	1.6	V	.500
- Cimmeron	FH	T/F 1.2	1.6	C	1000
- Central Park Avenue	FH	T/F 1.4	1.10	C.	400
- Aristocrate Drive	FH	T/F 1.6	lila	- Y	300
- East Bay	FH	T/F 1.6	1.70	$\gamma$	300
Industrial:			·	1	
- Success Drive	FH	D 1.6	I.la	V	(300 .
- Riveria at boat deck	BO	D ol		C-34	344080-
- Ground Squirel	FH	M-TH /. /	1.5	C	700
- CAPTINA	BD	M-TH 1.0	1.5	<u> </u>	1000
- 2822 San Pedro (Hills of San Jose	BO	M/TH ./	126	C	500
- Tori Court	BO	TT 1.6	1.7	<u>Y</u>	_ 300_
-4540 Rowan Road	FH	TH / 3	1.10	<u>N</u>	IDDD
- <u>Akuri</u>	BO	T/TH / 2	15	10	300
••		<u> </u>			
- Harrow Place	FH	D 1.0	1.5	<u>Y</u>	4000
- Severn Place	FH	TT /.5.	1.5	<u> </u>	300
- Villa Entrada	BO	MWF 1.0	1.5	<u>Y</u>	1000
Wood Bend	FH	TH 1.3	1.6		700
DATE: 11-29-99 MONDAY		NAME:	RAAR MI	Kobinso	
FH=Fire Hydrant BO=Blow Off		$\bigcirc$			
C=Clear Y=Yellow B=Blac	kO=Odor	A=Air/Milky			

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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#### FLUSH SCHEDULE

	. <b>b</b>				CLOSE	START	GAL'S
51	ADDRESS	TYPE	DONE	CL2	CLA	COLOR	<u>FLUSH</u>
			-	. 0	15	0	0001
48	- Davenport & Mitchell Blvd.	<u>FH</u>	D	<u>1,0</u>	1.5	<u> </u>	4000
5	Wyndham	BO	M/TH	2.0	2.2	Ċ	500
20.	- 1441 Haverhill	<u>FH</u>	D	2.0	2.2		000
112	Chelmam	<u>FH</u> FH	M/TH	10	10	- 7.	200
	- 1050 Trafalger	FH	the second s	7.3-			
40	- Daleside	the second s	T/TH D	1.4	- 2 -		500
465	- Stroud & Dawsbury	_FH_	D	13	-12		500
	-Stroud Court	_BO		110			0
	Wyndtree & Hooversham	<u>FH</u>	BROK				
	Forestedge	<u>FH</u>	BROK	EN			
EA.	Country Place:			16	12	C	500
54.	Lake Haven Drive & Haden	<u>FH</u>	<u>T/F</u>	<u>1.5</u> 1.4		<u> </u>	
Se	- <u>Cimmeron</u>	<u>FH</u>	T/F	1.5		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	<u></u>
	Central Park Avenue	FH	<u>T/F</u>	1.5	1.5	<u> </u>	
50	- Aristocrate Drive	FH	<u>T/F</u>	1.3		C	500
28	- East Bay	FH	T/F	1,0	(17	<u> </u>	<u></u>
-	Industrial:		D	10	1.5	ß	500
111	Success Drive	<u>FH</u>	 D	0.8	0.7	- A	
64	Riveria at boat deck	BO	M-TH	010			
	Ground Squirrel	FH BD	M-TH M-TH				
	CAPTINA		M/TH				
110	2822 San Pedro (Hills of San Jose		TT	1.0	1.5	Ċ,	300
TI	- Tori Court	BO	ТН	1.0	1.3		
20	4540 Rowan Road	<u>FH</u> BO	T/TH	1.5	7.5		500
5-2-	- Attari AUKARI	BU	/IR	1.5	7.0		
50.	Напоw Place	FH	D	0.9	1.5	C	1000
50-		FH	TT	1.3	1.5	C	500
-00	Villa Entrada	BO	MWF .				
	Wood Bend	FH	TH				
	DATE: 11/30/99		NAME:	BU	ff new	itso	
	FH=Fire Hydrant BO=Blow Off				1		
	C=Clear Y=Yellow B=Blac	ckO=Odor	r A=Air/ì	vlilky			

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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## FLUSH SCHEDULE

ADDRESS	TYPE	DAYS START DONE CL/2	CLOSE CL/2	START COLOR	GAL'S " FLUSH
A Davenport & Mitchell Blvd.	FH	D.k	2.1	C	2000
Wondham	BO	м/тн			
	FH	D 0.	<i>Ø.1</i>	<u> </u>	SUD
Chelmam	<u>FH</u>				
1050 Trafalger	<u> </u>	Т/ТН			
Daleside	FH	Т/ТН			
Stroud & Dawsbury	FH	D .9		<u> </u>	1500
A Stroud Court	BO	<u>D. 7</u>	1.5	<u> </u>	2000
N Wynduce & Hooversham	FH	BROKEN			
Forestedge	<u> </u>	BROKEN -			
Country Place:			······································		······································
Lake Haven Drive & Haden	<u>FH</u>				
Cimmeron	FH	T/F			
Central Park Avenue	FH	T/F	1		
Aristocrate Drive	FH	T/F			
East Bay	FH	T/F		· · · · · · · · · · · · · · · · · · ·	
Industrial:					
A Success Drive	FH	D J.D	d.D	<u> </u>	300
Riveria at boat deck	BO	D.8	1.7	<u> </u>	D 74/156D-
Ground Squirrel	FH	M-TH /.lo	1.6	<u> </u>	200
* CAPTINA	BO	<u>M-TH 9</u>	1.5		1000
2822 San Pedro (Hills of San Jose	) BO	M/TH			
Tori Court	BO	TT			
4540 Rowan Road	FH	TH			
Akuri	BQ	J/TH			
Hаrrow Place	FH	DE	1.5	<u> </u>	STOD
Severn Place	<u>FH</u>				
Villa Entrada	BO	MWF 1.3	<u> </u>	<u> </u>	1000
Wood Bend	FH	<u>TH</u>			
DATE: 12-1-99 E LOE DUESDAY FH=Fire Hydrant BO=Blow Off		NAME: _//	tenni Rol	<u>Unnon</u>	
C=Clear I=I cliuw D-Dlac		- VII UMIIKA			
NO WANT OF BLOW OFF	וא וזדעו		WITH ANY DIS	COLORED WA	TER COMING

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH ITII CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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-	- FOX HOLLOW FLUSH SCHEDULE								
ADDRESS	TYPE	DAYS START DONE CL/2	CLOSE CL/2	START COLOR	GAL'S FLUSH	ų.			
8838 Belmeadow 9129 Callaway	FH FH	MWF 1.4 MWF 1.4	1.5	C	400 400				
2356 Troski	FH	MWF 1.5	1.5	<u> </u>	500				
Bonnington & Hominy	FH	MWF /,2	1.6		600				
Spottswood	FH	WF /1/	1.5	<u> </u>	400				
Hagen Drive	BO	MWF /./	1.5	<u>IC</u>	1300				
Ventura	FH	MWF 1,3	1.5	C	1000				
Balsaridge	FH	MWF /. 6	1.6	C	ZOD				
FOXWOOD:						۵.			
Terilind	FH	W/F - 7	1.5	C	4500				
Cross Vine	FH	W/F . 9	1.5	C	300				
Daylilly	FH	MWF / 4	1,6	V	600				
WYNDGATE:		, , ,							
Courtlia	FH	MWF . 7	1.5	10	1000				
Craighurst	FH	MWF , 4	1.5	Ċ	1500 11:15				
Orchard Grove	FH	MWF : 4	1.5	C	4500 11:10				
Heritage Springs:									
Almond Wood		MWF ./	1. Le	C	2000				
FH=Fire Hydrant BO=Bl	ow Off	D=Daily		A					

FH=Fire Hydrant BO=Blow Off D=Daily

C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

DATE: 12-1-99 WEDNESDAY

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NAME: AVON DE RODINON

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#### FLUSH SCHEDULE

ADDRESS		TYPE			CLOSE CL/2	-	START COLOR	GAL FLU	ish ISH	
HDavenport & M	litchell Blvd.	FH	D	1.0	1.9		C.	de	<u>10</u>	
Wyndham		BO	M/TH	1.6	1.10		C	37		
1441 Haverhill		FH	D	1_6	1.34	واست من بي بين	C	.50	<u>10</u>	
Cheltnam		FH	M/TH	1.7	1.7		· V	30	0	
+1050 Trafalger		FH	T/TH_	1.7	1.7		Ľ	1 11	<u>50</u>	
-Daleside		FH	T/TH	1.4	<u>l·le</u>		<u> </u>	3		
KStroud & Daws	bury ·	FH	D	<u>'.l</u>	1.5		Ŀ	150	20 6 50	-
+Stroud Court		BO	D /	.2	1.5		C	150	20 8:55	-
Wyndtree & Ho		FH	BROK	<u>en</u>						1500
Forestedge		FH	BROK	<u>en                                    </u>						RED
Country Place:			<u> </u>							1
Lake Haven Dri	ive & Haden	FH	T/F ~_						·	18700
Çimmeron		FH	T/F ~							346
Central Park Av	venue	FH	T/F							766 200
Aristocrate Driv	/ç	FH	T/F -							
East Bay		FH	T/F —							
Industrial:			<u> </u>	-0			100	12.2	<u> </u>	
- Success Drive		FH	<u>D_i</u>	<u>e</u>	1.5		<u>y-A</u>	101		
Riveria at boat	deck	BO	<u>D 1</u>		1.5		<u> </u>	-0:3-130		
+Ground Squirre	1	FH	M-TH	[.0	1.le		<u>.</u>	50	$\frac{1}{2}$	
* CAPTIVA	·····	BD	M-TH	1.5	1.5		<u> </u>	50		
2822 San Pedro	(Hills of San Jose)	BO	M/TH	1.2	$\left( \cdot, \right)$		<del>C/</del>			
Tori Court		<u>BO</u>	TT	1.3	1.6		<u> </u>	30		
¥4540 Rowan Ro	oad	FH	ТН	<u> </u>	<u>1.7</u>		/Y		D 10000	
Akuri		BO	J/TH_	1.2	1.6		<u> </u>	300		
KALMONDU		FH	<u> </u>	B	1.1		<u> </u>	LODO	0 9.50	
₩ Нагтоw Place		FH			1.5		<u> </u>	<u> </u>		
Seven Place		FH		· le	<u>].le</u>		<u> </u>			
🔏 <u>Villa Entrada</u>		BO					(` <u>`</u>		<u>U-</u>	
-Wood Bend		FH	ТН							
					~	7				

DATE: 12-2.99

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NAME: <u>MYORAO Kobindon</u>

FH=Fire Hydrant BO=Blow Off C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

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NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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	r		FL U.	<i>SH SCH</i>	EDULE		<b>1</b>	
÷			D (1/0	07.497	CLOSE	START	GAL'S	
	ADDRESS	TYPF	DAYS	START	CLOSE	COLOR	FLUSH	
	ADDRESS	1114	201.0					
<b></b>	Davenport & Mitchell Blvd.	FH	D	0.3	1.0	Clerr	7,800 gals	
	Wyndham	BQ	M/TH	0.5	1.2	CLEER	<u> </u>	
	1441 Haverhill	FH	D	0.6	1.0	Cleck	5,400	
-	Chelmam	FH	M/TH	0.8	li2	Brownklear	2,000	
+	1050 Trafalger	FH	T/F	<u> </u>				
	Daleside	FH	T/F	<b>.</b>				
	Stroud & Dawsbury	FH	D	<u> 2.4</u>	1,3	Rusty	1,200	
	Stroud Court	BO	DC	.6	1.4	Clerk	<u> </u>	
-	Wyndtree & Hooversham	FH	M/TH		<u> </u>	contralue -	- no top	
-	Forestedge	FH	D 3	Does r	<u>ict open</u>	- opened kydr	rutdren Road to	
	Country Place:					· · · · · · · · · · · · · · · · · · ·	<u> </u>	
	Lake Haven Drive & Haden	FH	T/F			<u></u>	· ··· ······	
	Cimmeron	FH	T/F					
	Central Park Avenue	FH	T/F					
	Aristocrate Drive	<u>FH</u>	T/F				<u> </u>	
	East Bay	FH	<u>T/F</u>					
	Industrial:							
	Success Drive	FH	<u>T/F</u>		1 8			
	Riveria at boat deck	BO		<u>ae-</u>	1.0	elear	1.00	
	Ground Squirrel	FH	M-TH		10	<u>cloar</u>	2,000	
	Arboretum	FH	M-TH	<u>DIM-</u>		clear	1,500	
	2822 San Pedro (Hills of San Jose)	BQ		0,5-	1.0	clar		
	Tori Court	BO	TT					
	4540 Rowan Road	FH	TH	0.5-	17)	clear	BO.	
	Akuri	BO	MWF	0.0			B0`	
		T-11 T	n	na-	-1,5	Cloan		
-	Натоw Place	<u>FH</u> FH	D (					
	Severn Place	BO		10.5-	10	clear		
-	Villa Entrada	FH	TH	010				
	Wood Bend	гл			700	111		
	NITE 12/6/44		NAME:	. /1	ec Ol	Chem		
	DATE: <u>10/0/77</u>	-		<u> </u>			-	

FH=Fire Hydrant BO=Blow Off C=Clear Y=Yellow B=BlackO=Odor A=Air/Milky

NO HYDRANT OR BLOW OFF WILL BE TURNED OFF WITH ANY DISCOLORED WATER COMING THROUGH IT!! CONTACT SUPERVISOR IF YOU CAN'T GET IT CLEAR!!

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<b>0</b>					
.000 6021	clear	0'1-1'9	AWF		booW bromIA -
					Heritage Springs:
0001	10019	21-10	WWF	ĿН	- Orchard Grove
JOST	ولور	0.1-2.0	MWF	H	- Craighurst
0071	200	0'1-5'0	MWF	FH	- Courlis
					WYNDGATE:
200	wit	01-1.2	MWF	FH	- Daylilly
			W/F	FH	Cross Vine
		······································	M/F	FH	Terilind
					FOXWOOD:
रुठप्र	212210	01-8-0	MWF	EH	- Balsaridge
OOLI	22275	51712	MWF	HH	Eminov-
0051	212222	0.6-1.2	MWF	BO	- Hagen Drive
		2 2000	MF	ĿН	DOOWSTOOR
0011	22210	81-10	MWF	FH	vnimoH & norgninnoH -
0001	CLEER	0'1-9'0	MWF	FH	- 2356 Troski
0011	32010	51-90	MWF	FH	- 9129 Callaway
005	SIDOLD	L.1 - 8.0	MME	HI	- 8838 Belmeadow
HSATL	COTOR	כרע כרע	DONE	LYPE	SSEAULY
S. TV9	TAAT	START CLOSE	SXVA		

FH=Fire Hydrant BO=Blow Off D=Daily

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C=Clear Y=Yellow B=Black O=Odor A=Air/Milky

MANDODSI NAME:

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# THE PASCO COUNTY BLACK WATER STUDY

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PREPARED BY: Van Hoofnagle, P.E. Administrator Drinking Water Program Florida Department of Environmental Protection

AUGUST 9, 1999

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- Background Approach The Study Conclusions ٠
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- Attachments ٠

## THE SOUTHWEST PASCO COUNTY TECHNICAL ASSISTANCE AND RESEARCH PROJECT

#### Background

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Over the past few years, the Department of Environmental Protection has received numerous complaints about the quality of water being provided by a utility in southwest Pasco County. The Public Service Commission, the Department of Health, and a number of state legislatures also have been involved.

In general, the consumers complained that the water tasted and smelled poorly and contained a black sediment that plugged filter screens and stained laundry. Tests indicated that the offensive taste and odor were caused by hydrogen sulfide. The sediment in the black water was determined to be copper sulfide, a corrosion product formed by hydrogen sulfide and the copper in the home plumbing.

The Department reviewed the history of the water utility and determined that it was in compliance with the standards set in Chapter 62-550, F.A.C., Drinking Water Standards, Monitoring, and Reporting. The utility had exceeded the copper action levels prescribed by the rules and had implemented a treatment program to mitigate the corrosive properties of the water. As of the writing of this report, the water provided by the utility no longer exceeds the copper action level, and the utility is in full compliance with all standards.

In spite of the fact that the water provided by the utility met all standards, there was obviously an aesthetic problem with the water that needed correcting. The Public Service Commission (PSC) ordered the utility to perform an engineering study to determine what could be done to make the water more palatable. The utility's engineer proposed adding packed tower aeration to the treatment process to remove the hydrogen sulfide. Some of the utility's customers objected because the additional treatment would cause the cost of the water to rise. The customers want the utility to pay for the additional treatment and not pass the cost along. The PSC is still trying to resolve the issue.

#### Approach

The Drinking Water Section of the Department of Environmental Protection in Tallahassee conducted literature research to determine if there were any cheap and simple solutions to the black water and odor problems. A number of articles indicated that the color and odor conditions are caused by sulfate reducing bacteria in hot water heaters. It is believed that the bacteria convert sulfur and sulfates in the water to hydrogen sulfide, which is the odor smelled by the occupants. The hydrogen sulfide in turn reacts with the copper in the home water distribution system to create copper sulfide) - the black substance in the water. The articles suggested that generation of the hydrogen sulfide can be reduced by eliminating or reducing the number of bacteria in the hot water heater. This might be done by raising the temperature in the hot water heater to  $160^{\circ}$  F or greater, by disinfecting the water heater and distribution system, and by removing the sacrificial anode from the hot water heater.

35 hours

It was decided to conduct a study to determine if there were any actions homeowners themselves could take to reduce or eliminate the problems. Thirty-five families agreed to participate in a study, and the Department provided funds.

Many of the residents who had been complaining did not trust the utility, DEP or the Health Department to conduct an impartial study. We decided to find an impartial organization that had the capability to do the work. Florida Rural Water Association was chosen because of its experience with water problems and because it has a staff of highly qualified circuit riders. In June 1998, the Department contracted with the Florida Rural Water Association (FRWA) to conduct the research.

The Department recognizes that asking home owners to maintain their hot water heater temperatures at 160° F or greater is not practical from both safety and economical considerations. And, removing the sacrificial anodes will void the hot water heater warranties. So, FRWA was asked to undertake a research project to determine if something else would be effective in controlling the bacterial growth. It was finally decided that FRWA should flush and disinfect the hot water heater and pipes, elevate the temperature of the water heaters for a few hours, and replace the magnesium anodes with aluminum anodes. The water purveyor in the area believed that home point-of-entry water conditioning devices might contribute to the problem, so FRWA was asked to disconnect the water softeners in some of the homes to be studied. >

FRWA hired a local licensed plumber to do the physical work on the home water systems and a local laboratory certified by the Florida Department of Health to perform analyses on drinking water samples. FRWA circuit riders were responsible for contacting the participating families, taking the water samples, performing certain field analyses of the water samples and delivering the water samples to the laboratory.

## The Study

In late June and early July 1998, the circuit riders took initial baseline water samples from an exterior tap, an interior cold water tap and an interior hot water tap in 35 The circuit riders analyzed the samples for pH, calcium hardness, alkalinity, homes. orthophosphate residual, chlorine residual, and temperature. Samples were sent to the laboratory, which analyzed the samples for color, the presence of sulfur bacteria, sulfates, hydrogen sulfide, and copper.

During June and July 1998 the plumber performed a schedule of tasks on the hot water systems of 29 of the 35 homes in the study. In five houses designated as Group 1, the plumber disconnected the home water conditioning unit for the duration of the test, replaced the magnesium anode in the water heater with an aluminum one, disinfected the water heater using chlorine bleach, and raised the temperature to 160° F for a few hours. In ten homes designated as Group 2, the plumber replaced the anode, disinfected the heater, and raised the temperature for a few hours. In 12 homes designated as Group 3, he disinfected the heater and raised the temperature only. The final seven homes, Group 4. had no work done. The water from these homes was analyzed so a baseline could be maintained.

In August 1998 and March 1999, the Association circuit riders returned to the homes, sampled the water again, performed the same analyzes as were done on the initial

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samples, and took samples to the laboratory. Also, in March 1999 the circuit riders asked each study participant a few questions about what they had observed.

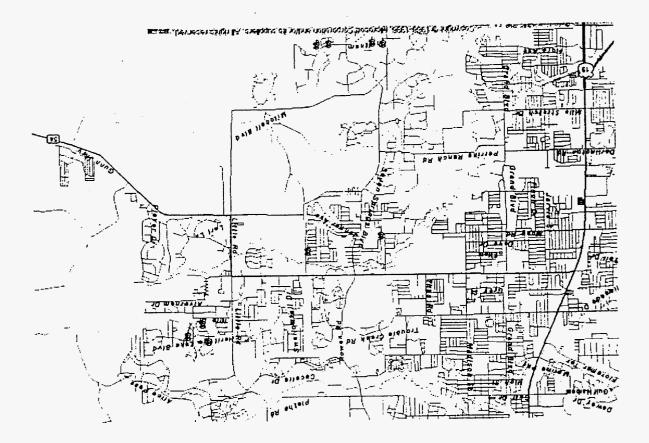
## Conclusions



The results of the study are inconclusive and mixed. None of the potential remedies seemed to have any lasting effect on the black water and odor problem. The presence or absence of water conditioning units in the homes appeared to have no effect on the generation of the hydrogen sulfide and the subsequent reaction with the copper pipes. The water conditioning units did not remove the orthophosphate from the water that was being added by the utility to inhibit copper corrosion. This had been a concern of the utility.

## Attachments

Attached to this report is a list of the families that participated in the study, copies of the raw data that were gathered, and copies of the exit interviews that were conducted by the Florida Rural Water Association in March 1999. Also, for future reference there are five appendices with publications about hydrogen sulfide and sulfate at the end of this report.



The Southwest Pasco County Study Area

- List Sorted by Study Group
  - List Sorted by Address
  - VIIsoted Alphabetically

Vames and Addresses of Participants

Раде 6 оf 10 Exhibit VAK-20 Docket No. 010503-WU

Alfa /Ast NAME

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## PASCO COUNTY STUDY

Last Name	First Name		Address	Group	Softener	Odor	Color
Bauer	Bill	4720	Sheffield Dr.	1	Y	Y	Y
Carlson	Amy	7052	Fallbrook Ct.	3	Y	Y	Y
Chavolich	Elaine	7409	Cheltnam Ct.	2	Y	Y	Y
Christodoulou	Chris	4324	Haverhill Dr.	3	Y	Y	N
Corelli	Vince	7644	Albacore Dr.	3	Y	Y	Y
Elorfi	Abdel	2215	Egret Walk Ct.	4	N	<u>Y</u>	Y
French	William	1868	Kinsmere Dr.	1	Y	Y	Y
Fuhman	Stewart	1400	Haverhill Dr.	4	N	Y	Y
Gerdon	Pat		Old Gate Cir.	4	N	Y	Y
Green	Lynn	7254	Forest Edge Ct.	3	Y	Y	Y
Hagerty	Robert	1445	Hoversham Dr.	3	Y	Y	Y
Hammett	Kay	4420	Whitetail Ln.	1	Y	Y	Y
Hershkowitz	Joel	5940	Cachette De Riviera Ct.	4	Y	Y	Y
Irwin	James	7106	Fallbrook Ct.	2	Y	N	Y
Kahle	Rence	8812	Napa Loop	3	N	Y	Y.
Layland	Carol	8117	Meadow View Dr.	2	N	Y	Y
Lucchesis	Joe	7643	Albacore Dr.	2	Ŷ	Y	- Y
Magnuson	R.E.	4736	Vicksburg Ct.	2	Y	N	Ŷ
Mazunek	Sharon	7239	Forest Edge Ct.	2	Ν	Υ.	<u> </u>
Millian	Susan	1234	Middlesex Dr.	1	Y	Y	Y
Mock	Barbara	1223	Middlesex Dr.	2	<u>N</u>	Y	Y
Moyer	Dace	1235	Middlesex Dr.	3	Y	N	Y
Napolitano	Gary	8205	Silversmith Pl.	1	Y	Y	Y
Oko	James	1202	Middlesex Dr.	4	Y	N	Y
Olenszyk	John	4818	Gristmill Cir.	4	N	N	Y
Parsons	Frank	1317	Middlesex Dr.	2	Y	N	Y
Reis	Richard		Hoversham Dr.	3	Y	Ν	Y
Silver	Helen		5 Trafalgar Dr.	3	Y	Y	Y
Sokol	Jackie		2 Cachette De Riviera Ct.	3	Y	Y	Y
St. Amo	Norma		Willets Ave.	2	Ŷ	Ŷ	Y
Van Emmerick			) Haverhill Dr.	2	N	N_	Ý
Vento	Stephen		8 Haverhill Dr.	3	N	Y	CPVC
Weber	Mike		2 Trafalgar Dr.	4	N	N	Y
Wells	Paul		2 Stroud Ct.	3	Y		Y
11010		1442	. 0.,020 01.	-	÷		-

Group 1: Drain/disinfect water heater, turn up temp, replace anode, disconnect POE device.

Group 2: Drain/disinfect water heater, turn up temp, replace anode.

Group 3: Drain/disinfect water heater, turn up temp. :

Group 4: Nothing.

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REANALYSIS OF DATA FROM PASCO COUNTY BLACKWATER STUDY 1998 DEPT.OF ENVIRONMENTAL PROTECTION BY V.ABRAHAM KURIEN, M.D

Total number of homes in study: 34

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Houses with softener systems : 24

Houses without softener systems: 10

- Group 1: Drain/Disinfect heater: turn up temperature: replace Anode: disconnect softener: 5 Homes with softeners
- Group 2: Drain/Disinfect heater: turn up temperature: replace Anode: 10 Homes: 6 with softeners, 4 without
- Group 3: Drain/Disinfect heater: turn up temperature: 11 homes With softeners, 1 without

Group 4: Do nothing: 2 homes with softeners and 5 without

A total of 173 **bacteriological tests** were done on two dates 7/8/98 and (POST INTERVENTION) 8/27/98

66 SAMPLES were tested at point of entry before softeners: 41 tests were done on cold water outflow 66 tests were done on hot water outflow

SITE : DATE: HOUSES WITH SOFTENERS HOUSES WITHOUT SOFTENERS

	7/08/98		-VE 21/24 87.5%	+VE 1/10 <b>10.0</b> %	-VE 9/10 . <b>90.0</b> %
POE	8/27/98		-VE 18/22 <b>%1.8</b> %		-VE 7/10 70.0%
	COMBINED		-VE 39/46	+VE 4/20	
**	7/08/98	+VE 6/7	-VE 1/7	+VE 1/2	-VE 1/2
			14.3%	50.0%	
COLD	8/27/98	+VE 6/22	-VE 16/22	+VE 2/10	-VE 8/10
		27.3%	72.7%	20.0%	80.0
	COMBINÊD	+VE 12/29	) -VE 15/29	+VE 3/12	-VE 9/12
			58.7%	25,0%	
**notic	e the sign	nificant i	reduction in	number of sam	ples

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SITE	DATE	HOUSES WITH SOFTENER	RS HOUSES WITHOUT SOFTENERS
- • •	7/08/98	+VE 18/24 -VE 6/24 75.0% 25.0%	+VE 7/10 -VE 3/10 70.0% 30.0%
HOT	8/27/98	+VE 17/22 -VE 5/22	+VE 7/10 -VE 3/10
•••	an da Carlos de Nation	77.3% 22.7%	70.0% 30.0%

 COMBINED +VE 35/46
 -VE 11/46
 +VE 14/20
 -VE 6/20

 76.0%
 24.0%
 70.0%
 30.0%

#### FINDINGS

1.POSITIVE BACTERIAL CULTURES OF BETWEEN 10-30% (AVERAGE 15.2-20.0%) AT THE POINT OF ENTRY IS OF EXTREME CONCERN AND RAISE THE POSSIBILITY THAT DISTRIBUTED WATER CONTAINS BACTERIA THAT CAN COVERT SULFATES INTO SULFIDES WITHIN DOMESTIC PLUMBING.

2.THESE DATA SUGGEST THAT SOFTENERS DO NOT INCREASE FREQUENCY OF BACTERIAL INVASION OF HOT WATER.

3. The data raises the possibility that the frequency of bacterial invasion in cold water is higher with softeners: however the number of samples analyzed were markedly smaller than for POE and HOT water tests ON 7/8/98

ANALYSED IN A DIFFERENT WAY, IS THE LIKELIHOOD OF A HOME WITH SOFTENER HAVING BACTERIA IN HOT WATER GREATER THAN THAT OF A HOME WITHOUT SOFTENER?

OF THE 24 HOMES WITH SOFTENERS, 18 WERE +VE : 75%

OF THE 10 HOMES WITHOUT SOFTENERS, 7 WERE +VE : 70%

#### THE ANSWER IS AN EMPHATIC NEGATIVE

CONCLUSIONS:

-----

- A. The samples are probably too small to draw conclusions unless appropriate statistical methods are used.
- B. The suggestion that Softeners increase the risk for bacterial invasion is without foundation
- C. There is no evidence to suggest that altering the hot water in the ways used in this study makes any difference to bacterial invasion.

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D. THE MOST SIGNIFICANT FINDING IS THE PRESENCE OF BACTERIA AT THE POINT OF ENTRY INTO THE HOMES IN 10-30%. IT MUST BE ASSUMED THAT DISTRIBUTED WATER FROM ALOHA UTILITIES INTERMITTANTLY CONTAINS BACTERIA, Divibrio sulfuricans, that is capable of converting Sulfates to sulfides and thereby causing the blackwater phenomenon.

## A testable Hypothesis: The water supplied by Aloha Utilities may contain on an intermittent basis Divibrio Sulphuricans, the anaerobic sulfate reducing bacteria, in addition to small amounts of sulfides as recently demonstrated.

This could be due to inadequately sustained chlorination of wells from which underground water containing the bacteria and hydrogen sulfide is extracted. A second possibility is the lack of sustained levels of residual chlorine in distributed water due to deficiencies in the process of chlorination or in adequately sustained automatic monitoring of chlorine residuals.

The background grayish discoloration of water in toilet tanks is due to the presence of small amounts of sulfides in distributed water reacting with copper in the domestic plumbing. The major events of blackwater appearing in domestic systems must be considered to be due to bacterial colonization of domestic plumbing, most likely to occur in the hot water systems and increased production of sulfides within the plumbing leading to aggressive copper sulfide formation.

Use of activated charcoal filters may accentuate bacterial colonization by removal of chlorine. Softeners, which are not coupled with activated charcoal filters, are not likely to facilitate bacterial colonization.

Effective treatment for getting rid of blackwater MUST address the issue of bacterial presence in distributed water along with elimination of residual sulfides. Without it any sterilization of domestic plumbing system will have only a very transient effect, if any, as documented by this study. Recolonization by bacteria from distributed water will cause recurrence of 'black water' due to corrosion of pipes.

New Port Richey, March 28, 2002

Abe Kurien

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# **Black Water Formation**

Black water is a term used to describe water containing dark, suspended material. The occurrence of black water has been widely reported in the service area of the Seven Springs Water System. It is frequently associated with hot water lines, but has also been reported in cold water lines within residences. The black material causes staining of laundry and fixtures. As part of the Phase II testing, an effort was made to identify potential explanations for black water by characterizing particles present in the treated water from each well and in the distribution system samples. In addition, two samples of black water were obtained to provide a comparison between water entering the residence and black water.

## Treated well water

For the each of the two sample events conducted for this study, the concentration of particles in the treated water was fairly low. There was no measureable hydrogen sulfide in any of the treated water samples and they all contained an adequate chlorine residual. The suspended solids concentration was below the detection limits of the test (< 1 mg/L).

Particles from samples of treated well water were concentrated about 25 fold using centrifugation. The particles were resuspended in water, preserved with chemical fixative, dehydrated, collected on a filter with a pore size of 0.01  $\mu$ m, coated, and analyzed using electron microscopy coupled with X-Ray analysis to determine the particle size and elemental composition of the particles. In most cases, the particle density was extremely low.

Examples of the particles isolated from treated water from well 8 are shown in Figure 24. The number of particles in all of the well samples was extremely low (<100/mL). The smaller, spherical particles (< 1  $\mu$ m) were composed of iron, sulfur, and phosphate, whereas the larger particles (> 5  $\mu$ m) contained a higher proportion of sulfur. The particle size of the sulfur-rich particles varied from 0.1 to over 10  $\mu$ m. These particles are small enough to remain suspended in the water, but could accumulate in locations that have low velocities and a long residence time (dead-ends).

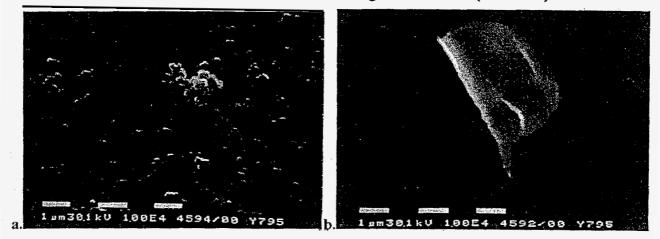


Figure 24. Comparison of electron micrographs of particles isolated from treated water from well 8. a) particles consisting of iron-phosphorus-sulfur; b) particles consisting of sulfur and organic material. The scale in the micrograph is depicted by the white bar  $(1 \ \mu m)$ .

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## Distribution system samples

A comparison of particles isolated from the Main Plant inflow is shown in Figure 25. Again, the concentration of particles was fairly low and the composition of the particles was similar to that observed for samples from the treated well water. The smaller particles contained iron and sulfur with trace amounts of phosphorus, whereas the larger particles consisted of calcium-sulfur precipitates.

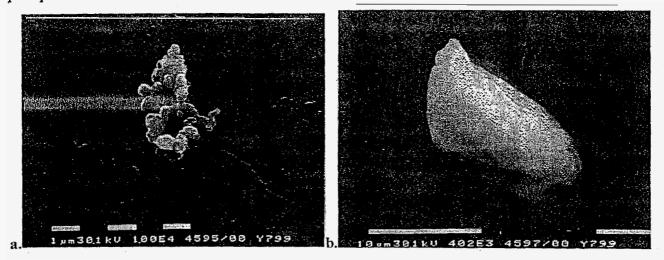


Figure 25. Comparison of electron micrographs of particles isolated from treated water from the main plant inflow. a) particles consisting of iron-phosphorus-sulfur; b) particles consisting of sulfur and calcium. The scale in the micrograph is depicted by the white bar (1  $\mu$ m for a and 10  $\mu$ m for b).

A comparison of the dominant elements identified in particles from the distribution system (treated well water, main plant, and distribution system samples) and the percent of particles that contained each element is shown in Figure 26. Calcium, silica, chloride, sulfur, and iron were the dominant constituents of the particles isolated from the distribution system. Calcium, copper, iron, silica, and sulfur were the most frequently detected elements. Aluminum, chloride, potassium, and magnesium were detected less frequently. All particles that contained phosphorus also contained calcium and copper and most contained iron. The presence of sulfur in a particle also corresponded to the presence of varying amounts of iron and calcium. All particles that contained copper also contained calcium, iron, sulfur, and silica.

The formation of particles in the distribution system results from chemical solubility reactions that occur within the pipeline and result in the formation of insoluble particles. Calcium, iron, and sulfur are all present in the untreated water. In this study, the concentration of silica was not measured, however its source is either from the wells or from exposure to concrete piping materials. The phosphorus is added to the water as a corrosion inhibitor and it functions as a complexing and sequestering agent for metals and minerals. The concentration of aluminum was not measured as part of this study, but it is probably associated with the source of silica. Trace levels of copper were detected in the distribution system samples and ranged from 0.04 to 0.14 mg/L. The source of the copper is either from the water pipes or from the fixtures in the home (Neff et al. 1987).

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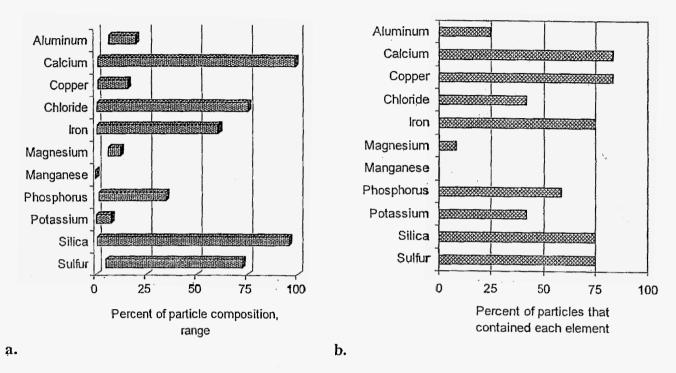


Figure 26. Comparison of distribution of dominant elements in particles isolated from the distribution system (well water, main plant, distribution system samples). a) relative percent of particle composition, b) percent of particles that contained each element.

## Black water samples from residential plumbing

This study was focused on analysis of untreated water, treated water, and distribution system water. Therefore, analysis of black water samples was not a primary objective of the study. Preliminary information on black water characteristics was obtained from two sites. During the distribution system sampling, samples of black water were collected on an ad hoc basis from two residences (D-2 and D-7). In one case (D-2b) the sample was from the hot water tank, in the other case (D-7b), the sample was from a hot water faucet that serves the bathtub. The samples were characterized in parallel with the other distribution system samples and particles were examined to evaluate particle size and particle composition. In general, the chemical composition of the samples of black water was similar to the samples of water entering the residences with the exception of the quantity of iron and copper associated with the particles. A comparison of iron and copper levels in the water entering the residence and the black water samples is shown in Figure 27. As shown, in both cases, the black water contained significantly higher levels of copper and iron. In both cases, there was a slight increase in the sulfate concentration associated with the black water (~5 mg/L).

Very few particles were detected in the distribution system samples and the majority of the particles were similar in composition to the particles isolated from the treated well water and the main plant (see Figures 24 and 25). Examples of particles isolated from distribution samples D-2 and D-7 are shown in Figure 28. The particles from D-2 are composed of silica, aluminum, sulfur, iron, phosphorus, copper and calcium. Particles isolated from D-7 are composed of phosphorus, sulfur, calcium, and silica.

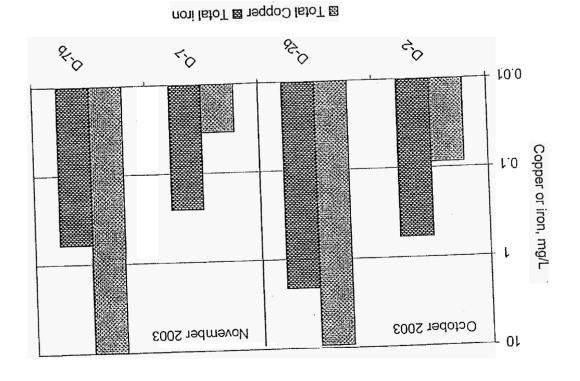


Figure 27. Comparison of total copper and total iron associated with distribution system water (D-2 and D-7 and D-7 and bot water faucet (D-7b).

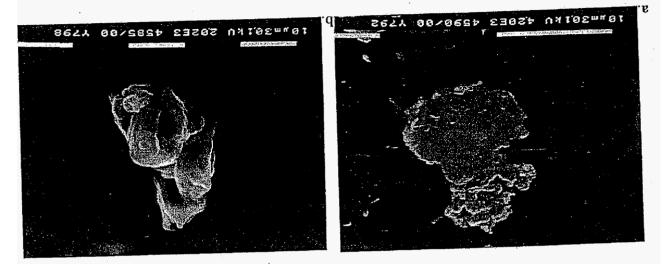


Figure 28. Comparison of electron micrographs of particles isolated from distribution system samples D-2 and D-7. a.) Particles isolated from D-2 consist of silica-aluminum-sulfur-ironphosphorus-copper-calcium. b.) Particles isolated from D-7 consist of phosphorus- sulfur- calcium-silica. The scale in the micrograph is depicted by the white bar (10 µm). calcium-silica. The scale in the micrograph is depicted by the white bar (10 µm). Samples of black water were processed for examination by electron microscopy. Examples of particles isolated from sample D-2b are shown in Figure 29. This sample was dominated by the presence of aluminum. The spherical particles are composed of aluminum, copper, phosphorus, and iron. Examples of particles isolated from sample D-7b are shown in Figure 30. There was no evidence of aluminum in the particles from sample D-7b and the dominant elements in the particles were copper, sulfur, and phosphorus.

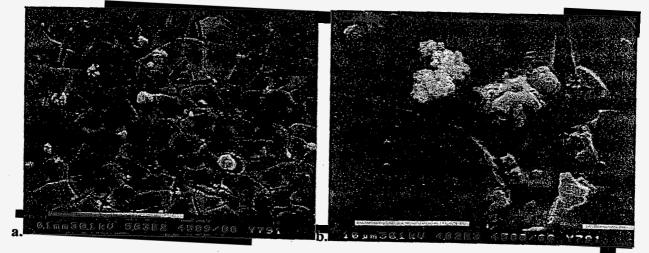


Figure 29. Comparison of electron micrographs of particles isolated from sample D-2b. Particles consist of aluminum-copper-sulfur-iron-phosphorus-calcium. The smaller particles are predominantly aluminum-phosphorus. The scale in the micrographs is depicted by the white bar (100 µm or10 µm).

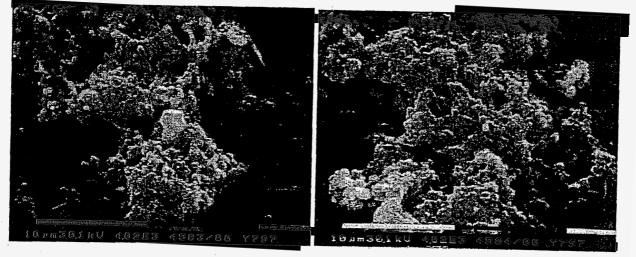


Figure 30. Comparison of electron micrographs of particles isolated from sample D-7b. Particles consist of copper-sulfur- phosphorus with some calcium and iron present. The scale in the micrographs is depicted by the white bar  $(10 \ \mu m)$ .

An additional analysis was conducted on particles isolated from a whole house water filter obtained from a residence in the Seven Springs service area. The particles were removed from the filter and processed for electron microscopy. Examples of the particles isolated from the filter are shown in Figure 31. The dominant elements in the particles were iron, phosphorus, calcium, and sulfur.

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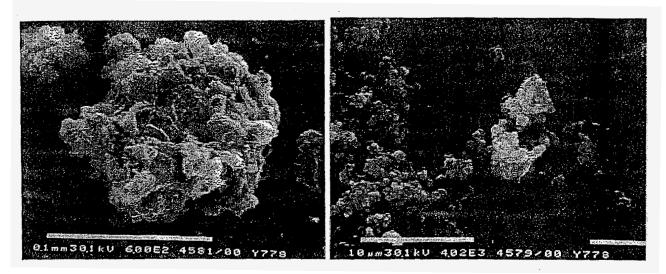


Figure 31. Comparison of electron micrographs of particles isolated from a household water filter that is used to filter water entering the house. Particles consist of iron-phosphoruscalcium or iron-sulfur with trace amounts of copper. The scale in the micrographs is depicted by the white bar (100 µm or 10 µm).

A comparison of the elemental composition of particles isolated from the filter is shown in Figure 32. The dominant element in the particles was iron. Calcium, copper, chloride, iron, and phosphorus were identified in all of the particles.

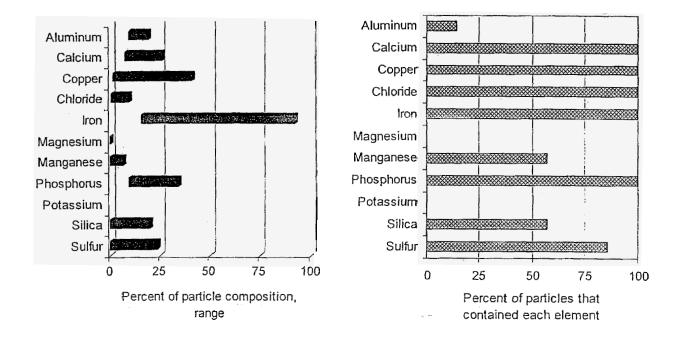


Figure 32. Comparison of distribution of dominant elements in particles isolated from a water filter installed on the inflow to a residence a) relative percent of particle composition, b) percent of particles that contained each element.

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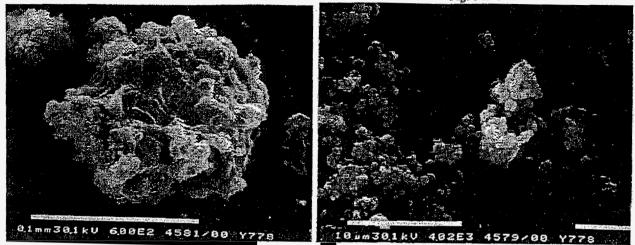
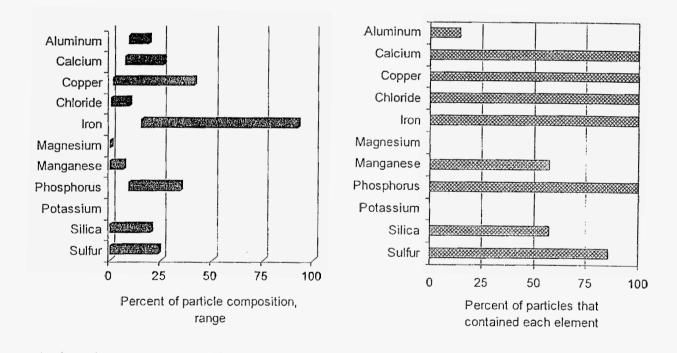
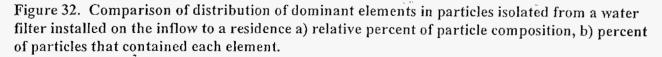


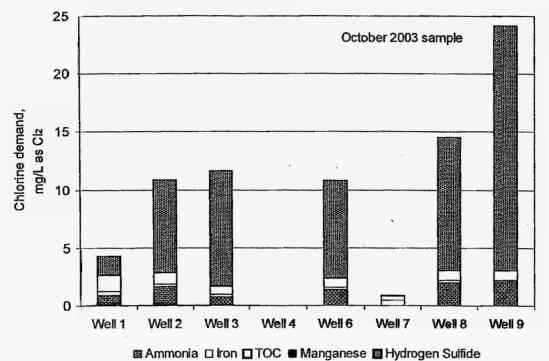
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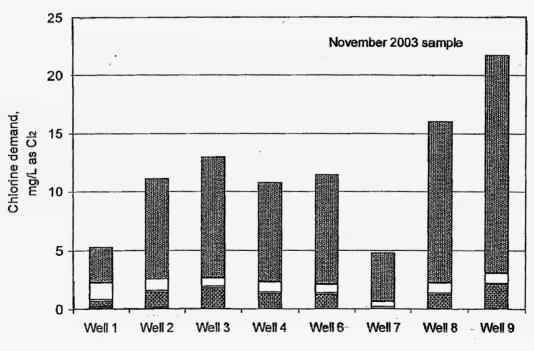




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b. Comparison of chlorine demand for November 2003 water samples.

Figure 14. Summary of chlorine demand for water from the Seven Springs Water system.

## CALCULATIONS OF THE CHLORINE DEMAND OF HYDROGEN SULFIDE IN ALOHA WELLS

Its significance in Relation to the production of Sulfate and Elemental Sulfur From Oxidation of Hydrogen Sulfide With the **sole** use of Chlorine

V. Abraham Kurien, M.D.

Oxidation of 1 mg of hydrogen sulfide to elemental sulfur requires only 2.08 mg of chlorine, where as 8.33 mgs of chlorine is required to oxidize hydrogen sulfide to sulfate (Dr Levine, Phase II Report, page 16). **2.08 and 8.33** are referred to as the chlorine demand of hydrogen sulfide for its oxidation to elemental sulfur and sulfate respectively.

When the chlorine demand specific to hydrogen sulfide alone is calculated as Dr Levine did during her technical review of Aloha, it gives an idea about approximately how far the oxidation of hydrogen sulfide has proceeded in the treated source water. When the calculated value of chlorine demand is closer to 2.08 more elemental sulfur can be assumed to have been produced in the treated water, where as when the number is closer to 8.33 it is more reasonable to assume that most of the hydrogen sulfide has been oxidized to sulfate.

Thus the chlorine demand number (expressed as mg/l of water to oxidize 1 mg/l of hydrogen sulfide) is an approximate indication of what percentage of hydrogen sulfide has been oxidized to sulfate and what percentage has been oxidized only to elemental sulfur. At a chlorine demand of **5.0** – **5.5**, it is reasonable to assume that 50% of the hydrogen sulfide has been oxidized to sulfate and the rest has been oxidized only as far as elemental sulfur. This is only an approximate theoretical calculation since other species of sulfur are also produced during the oxidation of hydrogen sulfide by the sole use of chlorination.

In the specific case of well 8 on 11.12.03, according to the sampling reports and calculations submitted by Dr Levine, we know that the calculated amount of chlorine that was added to each liter of raw water from well 8 was 18.9 mg (page 18, Phase II report). Of this 3.5 mg/l was left behind as chlorine residual (page 55). Therefore the oxidizable materials in the raw water that day consumed 15.4 mg of chlorine. Of this according to Dr Levine's calculations, as shown in figure 14b (page 20) 1.9 mg was used up by ammonia and total oxidizable carbon(TOC). The rest 13.5 mg was consumed in the oxidation of hydrogen sulfide.

The amount of hydrogen sulfide in that well was 1.73mg/l of raw water (page 55). All of this was oxidized as there was less than 0.01 mg/l of hydrogen sulfide was detected in the finished water.

When the number 13.5 is divided by 1.73 a number close to **7.83** is obtained, which is the chlorine demand of hydrogen sulfide in that well on that day at the time the sample was taken. Since this number is close to **8.33**, the chlorine demand for the conversion of **all** hydrogen sulfide to sulfate, we conclude that most of the hydrogen sulfide in that well was converted to sulfate on that day and that only minimal elemental sulfur was formed. Dr Levine confirmed this by the scanning electron microscope photographs that showed few particles of colloidal sulfur.

On the contrary on 10/29/03 there was **3.95** mg/l of hydrogen sulfide present in the raw water in well 9. The total amount of chlorine injected was 24.60 mg/l close to the maximum amount of chlorine that can be injected at that well (Dr Levine, Phase I report, page 20). The chlorine residual was 2.70mg/l. Chlorine consumed at that well was 21.90/l of raw water. Approximately 3.0 mg/l of chlorine was consumed by ammonia and total oxidizable carbon (TOC) as per Dr Levine (page 20, figure 14.b Phase II report).

18.9 mg/l of chlorine (21.90 –3.0) was consumed by 3.95 mg/l of hydrogen sulfide as only less than 0.01 mg/l of hydrogen sulfide was present in the "finished" water. The chlorine demand of hydrogen sulfide in raw water is calculated as 18.9 divided by 3.95 giving a value of **4.78** mg/l.

Theoretically this means that almost 50% of hydrogen sulfide was oxidized only as far as elemental sulfur. Dr Levine has indicated that even if the maximum available chlorine at well 9, which is 25mg/l was used, after providing for a free chlorine residual of 3mg/l, only 2.6 mg of hydrogen sulfate could be oxidized to sulfate by the remaining available chlorine of 22 mg/l. The rest, 1.35mg/l will remain as hydrogen sulfide itself or some other form of sulfur other than sulfate.

Since no hydrogen sulfide was detected in the finished water at the plant, what was the fate of the hydrogen sulfide in raw water? To what extent was hydrogen sulfide oxidized to elemental sulfur and sulfate? The calculation of the specific chlorine demand for hydrogen sulfide alone shows that with a chlorine demand number of 4.78, only 50% of the total oxidized hydrogen sulfide was converted to sulfate. The rest must have been oxidized only as far as elemental sulfur.

This would mean that, if elemental sulfur and sulfate levels could have been measured in the finished water at well 9 on 10/29/03, one would have obtained a result close to 2.0 mg/l for elemental sulfur and 2.0 mg for sulfate.

If scanning electron micrography were undertaken on finished water from Well 9 on 10.29.03, it would have certainly showed more numerous particles of colloidal sulfur than was seen in the SEMs from water processed at well 8. Unfortunately, the sample of finished water from well 9 was not used for obtaining SEMs.

Any time hydrogen sulfide level in raw water from well 9 was over 2.6 mg/l there would have been elemental sulfur in finished water from that well. Every one of the 20 samples of raw water from well 9 collected during the April –July 2001 period had a concentration of hydrogen sulfide that was greater than 3.0 mg/l and therefore the finished would have definitely contained elemental sulfur.

Since the statistical mean of chlorine demand for hydrogen sulfide from the 15 samples of water obtained from Aloha 's 8 wells on 10/29/03 and 11/12/03 was 5.5 mg/l, (page 21, Fig.15 Phase II Report) it is highly likely that a significant number (10/15) of those finished water samples would have contained elemental sulfur. As Dr Levine's calculations show (page 20, Fig.14 and b) 7/10 of these samples that had chlorine demand values around 5.0 - 5.5 were drawn on 10/29/03 when SEM studies were not done!

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Aloha Utilities

Seven Springs Water System FILE COPY

Technical Review of Production and Distribution of Drinking Water in the Seven Springs Water System

> Phase I Analysis of monitoring and operations data

> > Submitted to Attorney Jack Shreve Attorney Steven C. Burgess Office of Public Counsel 111 W. Madison Street # 812 Tallahassee, FL 32399-1400

Submitted by Dr. Audrey D. Levine, P.E. Associate Professor Department of Civil and Environmental Engineering University of South Florida 4202 East Fowler Ave., ENB 118 Tampa, FL 33620

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August 2003

Well	Maximum available chlorine dose, mg/L
1	8.3
2	20.8
3	41.7
4	41.7
Main plant: wells 1-4	27.8
6	18.5
7	18.5
8	25.0
9	25.0

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Table 3. Comparison of the theoretical chlorine dose available at each well in the Seven Springs Water system.

Typically, the reaction products from chlorination of hydrogen sulfide include a combination of sulfur species including sulfate and elemental sulfur, depending on water quality variables such as pH, temperature, iron, manganese, and organic carbon. Process operation is constrained by regulatory limits on residual chlorine in the distribution system. It is critical that the residual chlorine in the distribution system be below 4 mg/L.

The theoretical chlorine requirements can be estimated from water quality data. For discussion purposes, the chlorination requirements for well 9 can be estimated as follows. Based on the limited dataset available for well 9, sulfide levels vary from about 2.4 to 6.6 mg/L. Iron levels vary from about 0.02 to 0.4 mg/L. Assuming a residual chlorine level of 3 mg/L in the treated water and worst case for iron (0.4 mg/L), the chlorine dose necessary to oxidize the iron and sulfide as a function of sulfide concentration is shown in Figure 21.

As shown, for sulfide levels up to about 2.6 mg/L, there is adequate chlorination capacity to completely oxidize the sulfide to either sulfur or sulfate and maintain a chlorine residual of about 3 mg/L. If all of the sulfide is oxidized to elemental sulfur, there is adequate chlorination capacity at well 9 to oxidize up to about 11 mg/L of sulfide and still maintain a chlorine residual of about 3 mg/L. In reality, the reaction chemistry is complex and it is likely that both sulfate and elemental sulfur are formed from sulfide oxidation. The detection of a chlorine residual in the treated water is evidence that sulfide oxidation has occurred, however the reaction products can only be determined by conducting a mass balance on sulfur in the system.

It is important to note that oxidation of sulfide to either sulfate or elemental sulfur acts to eliminate the sulfide odor. However, oxidation reactions do not remove the sulfur and either form of sulfur (sulfate or sulfur) can revert back to sulfide under conditions of low dissolved oxygen, low chlorine residual, the presence of metal catalysts, and/or when growth conditions are favorable for sulfur reducing bacteria. Sulfate is naturally present in all groundwater and the levels of sulfate in the water from the Seven Springs System are fairly low. Thus, oxidation of sulfide will eliminate odors but does not eliminate the potential for conversion to other forms of sulfur. Aloha Utilities

Seven Springs Water Systen FILE COPY

**Technical Review of Production and Distribution of** Drinking Water in the Seven Springs Water System

> Phase I Analysis of monitoring and operations data

> > Submitted to Attorney Jack Shreve Attorney Steven C. Burgess Office of Public Counsel 111 W. Madison Street # 812 Tallahassee, FL 32399-1400

Submitted by Dr. Audrey D. Levine, P.E. Associate Professor Department of Civil and Environmental Engineering University of South Florida 4202 East Fowler Ave., ENB 118 Tampa, FL 33620

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August 2003

	November 1996	February 2001
Well	Hydrogen sulfide, mg/L	Hydrogen Sulfide, mg/L
1		< 0.10
2		0.68
3		1.78
4		0.46
6		0.94
7		< 0.10
8	0.7	1.50
9	2.4	3.85

Table 2. Comparison of measured sulfide levels in untreated well water from wells thatserve the Seven Springs Water system.

A pilot study was conducted in 2001 to test the effectiveness of an ion exchange treatment technology (MIEX) for removal of hydrogen sulfide from well 9. During the pilot study, sulfide levels were measured either once or twice daily. A summary of sulfide levels associated with untreated water from well 9 between April and July 2001 is shown in Figure 10. As shown, there was significant variability in the sulfide levels over the short time span of the study. All of the reported sulfide levels were above 3 mg/L and in some cases levels were over 6 mg/L. It should be noted that this study was conducted during the drought and the degree to which drought conditions influenced sulfide levels is not known. Routine monitoring of hydrogen sulfide in the raw water would be useful to determine if the 2001 data represent "typical" values.

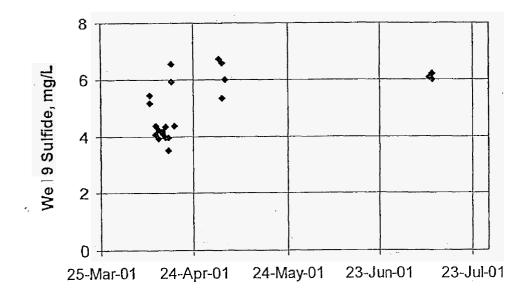


Figure 10. Summary of hydrogen sulfide levels in untreated water from well 9 during a pilot study conducted to evaluate the effectiveness of ion exchange treatment (Data from Porter, 2002).

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## EXHIBIT D

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# CRETEMARAS YTLIAUO RETAW JATNEMEJ99US

ad of villeup refer and another help woled being istemane the mater quality to be minimum, at the Point(s) of Connection for the following parameters. The Quality Water Water supplied from the Authority's System shall be sampled annually at a

COSI

provided by the Authonity.

## Contaminant

(aulav muminim) 500s0 se ilem 04 300 mg/l as CaCOs 1/6W 1.0

Alkalinity Real Hardness sapyins

Note: Supplemental parameters are not currently included in S.F.D.E.P.

055-290

The results of the annual sampling program shall be provided to all the Member

enous in State and Federal regulations. vinenity shall follow the refecting and mitigative measures currently arom to ano tot bebaeaxe at sidet and mort level manimation mumixam ant asteoibri mangory grildmas laurins and that the event that the annual singnome videtupe benars of to se Authority as an Operation, Maintenance and Administrative Cost to be ed lishs mergery priliqmes levrine and to too ant Jamot hoger a ni alnammeved

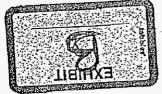
the arbitration process established in Section 19 of the Contract. The standards for the amended list of parameters or their assigned levels, shall be entitled to seek relief by supplement this Exhibit D Any Member Government that does not concur with the lishs break for Board approval Such list when approved by the Board, shall bne statemeter of a minimum of 19 Supplemental Water Quality parameters and meeting of the Authonity's Board of Directors, the Authority and Member Governments Within 60 days of February 23,1998, or the next following regularly scheduled

arbitration process shall be:

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sources, and Upper Plan objectives, including diversity of supply Whether cost-effective alternative water supplies can be developed ٦,

processes, to meet a moderately altered source of Quality Water. beyond modified chemical dosages and/or optimization of existing unit particular Member Government utility to adopt new treatment techniques Whether Quality Water delivered by the Authority would not cause a



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Page 2 of 3 Exhibit VAK-26 Docket No. 010503-WU In the event that a Member Government requests sampling for additional parameters or an increase in sampling trequency, the cost associated with the sampling parameters or an increase in sampling trequency, the cost associated with the sampling parameters or an increase in sampling technic for the Member Government and not by the Authority. If scheduling permits, the Authority may provide the sampling services at cost to the Member Government may perform the additional testing.

Sampling shall be conducted in accordance with the procedures defined in the current regulations for the Primary and Secondary Drinking Water Standards and/or according to <u>Standard Methods</u>, latest edition, for those parameters for which testing procedures are not defined in the regulations.

The Authority shall evaluate each new supply element to ensure that.

 Quality Water is provided that at a minimum, meets all Federal and State drinking water quality standards with the exception of corrosion control and disintection so as to protect public health and safety and provide water as aesthetically-pleasing as is currently supplied.

- o Individual Member Governments will continue to provide additional treatment to meet their individual utility-specific water quality goals and customer expectations for level of service.
- Member Governments, acting through the Authonity, may provide for common water quality goal-related elective standards more stringent than Federal and State drinking water standards, and.
- Cost-effective alternative water supplies are developed consistent with Master Water Plan objectives, including diversity of supply sources, and
- 5. Quality Water delivered by the Authority would not cause a particular Member Government utility to adopt new treatment techniques beyond modified chemical dosages and/or optimization of existing unit processes, to meet a moderately altered source of Quality Water.

Prior to the initiation of any new supply element, a formal review against the criteria set forth above shall be performed by the Authority to evaluate anticipated finished water quality, impacts to existing system water supply quality, and impacts to current member government-specific water treatment practices and costs. This review adailies for each individual Member Government the predominant raw water source, water quality parameters and potential significant additional raw water sources, water quality parameters and potential significant additional raw water sources, water quality parameters and potential significant additional raw water sources.

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#### Table 3

#### Exhibit D Supplemental WQPs Proposed Compliance and Action Levels

Parameter	Compliance Level (See Note 1)	Action Level (See Note 2)
Field Conductivity	850 mhos/cm (max-avg)	850 mhos/cm (max)
Field Temperature	35°C (max-avg)	35°C (max)
Total Alkalinity	40 mg/L as CaCO ₃ (min-avg)	40 mg/L as CaCO ₃ (min)
Total Sulfide	0.1 mg/L (max-avg)	0.1 mg/L (max)
Total Hardness	300 mg/L as CaCO ₃ (min-avg)	300 mg/L as CaCO ₃ (max)
Calcium Hardness Color TOC Iron Turbidity Odor Fluoride	50 mg/L as CaCO ₃ (min-avg) and 250 mg/l as CaCO ₃ (max-avg) 15 CU 3.6 mg/L (max-avg)/6.5 mg/L (max) 0.15 mg/L (max-avg) 1 NTU (max-avg) 2 TON (max-avg) / 3 TON (max) 0.8 mg/L (max-avg)	50 mg/L as CaCO ₃ (min) or 250 mg/L as CaCO ₃ (max) 15 CU (max) 3.6 mg/L (max) 0.15 mg/L (max) 1 NTU (max) 2 TON (max) 0.8 mg/L (max)
pH	7.4 units (min-avg)	7.4 units (min)
Nitrite	1 mg/L as N (max-avg)	1 mg/L as N (max)
Nitrate	10 mg/L as N (max-avg)	10 mg/L as N (max)
TDS	500 mg/L (max-avg)	500 mg/L (max)
Ammonia	1 mg/L as N (max-avg)	1 mg/L as N (max)
Total Phosphorus	1 mg/L (max-avg)	1 mg/L (max)
Orthophosphate	1 mg/L as P (max-avg)	1 mg/L as P (max)

#### Notes:

1 Compliance Notes

(max-avg) = a not-to-exceed average value using a running four quarterly sample average (min-avg) = a must-exceed average value using a running four quarterly sample average (max) = a not-to-exceed value

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(min) = a must-exceed value

NA = compliance level has not been set

#### 2 Action Level Notes

(max) = a value that, if exceeded, requires the Authority to take certain actions (min) = a value that, if not exceeded, requires the Authority to take certain actions NA = action level has not been set

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## March 29, 2004 VIA HAND DELIVERY

ORIGINAL



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SCENTS-FSC

MARTIN S. FRIEDMAN, P.A. VALERIE L. LORD, OF COUNSEL (LICENSED IN TEXAS ONLY)

Rosanne Gervasi, Esquire Legal Division Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

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Re: Aloha Utilities, Inc.; PSC Docket No. 020896 Our File No. 26038.37

Dear Rosanne:

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Thank you and the staff for allowing us the additional time that Aloha needed in order to review the questions posed by the staff and to investigate with vendors and suppliers the various alternatives proposed in Dr. Levine's report. As you know, our engineers also had numerous discussions with Dr. Levine in order to get clarifications of her proposals and her comments and suggestions. Her input has been fully incorporated into our responses.

I am attaching hereto the responses to the staff questions, both on the responses and the cost estimates, the summary of estimates for both capital and operational costs prepared by David Porter, and our rough calculation of the rate impact each of the alternatives would have. Keep in mind that there are many assumptions underlying both David's analysis and the rate impact analysis. We have tried to detail the major assumptions within this information and within David's responses to each of your specific numbered inquiries, but there are always so many assumptions underlying a conceptual estimate such as this before design or permitting is underlying assumptions. However, we do believe that the attached is a good conceptual response and analysis of each of the options outlined in Dr. Levine's reports and our understanding of her recommendations as further clarified through our subsequent discussions with the rand here.

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FPSC-COMMISSION CLERK

FREDERICK L. ASCHAUER, JR. CHRIS H BENTLEY, P.A. ROBERT C BRANNAN DAVID F. CHESTER F MARSHALL DETERDING JOHN R. JENKINS, P.A. STEVEN T MINDLIN, P.A. DAREN L. SHIPPY WILLIAM E. SUNDSTROM, P.A. DIANE D TREMOR, P.A. JOHN L. WHARTON

ROBERT M. C. ROSE, OF COUNSEL WAYNE L. SCHIEFELBEIN, OF COUNSEL

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Rosanne Gervasi, Esquire March 29, 2004 Page 2

with the various vendors of material, supplies and equipment related to those options.

If the Commission staff intends to utilize any of the information from this report and distribute it at the customer service hearing, we caution you to make sure that its conceptual nature is clearly noted and the major assumptions underlying it are also included.

If you have any further questions in this regard, please do not hesitate to contact me.

Sincerely,

ROSE-SUNDSTROM & BENTLEY, LLP E-Marshall Deterding For The/Firm

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cc: Marshall Willis, CPA Mr. Tom Walden Stephen Watford, President David Porter, P.E.

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# Docket 020896-WS PSC Letter Dated February 20, 2004 Staff Data Request Data Submission by Aloha Utilities, Inc.

Due to time constraints, the cost data was developed based on limited data and, therefore, must be considered conceptual in nature. This cost analysis provides a means of comparing the treatment alternatives based on similar design assumptions. More accurate cost information will result from discussing regulatory requirements with the FDEP as the project design work is undertaken.

It has been assumed when preparing these estimates that the PSC Commissioners would revise their Order in Docket 010503-WU to require Aloha to produce a finished water that is consistent with hydrogen sulfide performance standards required by Tampa Bay Water, i.e. that the average concentration of hydrogen sulfide is no more than 0.1 mg/L based on an annual average of 4 quarterly samples collected at the point of entry into the distribution system at each water plant. This limitation is consistent with the goals of Tampa Bay Water which supplies water to numerous water systems in this region as Dr. Levine discusses in her Water Audit Report.

We have assumed that the FDEP required conversion of Aloha's existing water plants from free chlorine disinfection to the sequential use of free chlorine followed by chloramine disinfection to make Aloha's water compatible with Tampa Bay Water/Pasco County water would be required to be completed by January 2005. It is important to note that this date represents a slip from an October 2004 target conversion date provided to Aloha Utilities several months ago by Pasco County. The revised date was only recently provided to Aloha by Pasco County. Therefore, the January 2005 conversion date has been assumed for the purposes of developing the responses herein. As Aloha has discussed with the Staff and the Commission previously, Aloha must convert its water treatment systems to chloramine disinfection by January 2005 to allow its water to be compatible with water supplied by Pasco County (Tampa Bay Water). Therefore, any process chosen for the hydrogen sulfide treatment step must be able to be implemented by January 2005 also.

Each of the options presented, and the related cost data, include the addition of treatment technology to produce a finished water with an average hydrogen sulfide concentration of 0.1 mg/L as described above and to implement the change from free gaseous chlorine disinfection to the use of liquid chlorine (sodium hypochlorite) as a primary disinfectant followed by chloramine as a secondary disinfectant which will be required to be completed as part of the modification of the plants.

Each of the treatment technologies Dr. Levine recommended in her report are capable of reducing the hydrogen sulfide concentration of Aloha's raw water to very low levels. We agree with Dr. Levine that when the hydrogen sulfide concentration of the finished water is reduced, and the other benefits provided by her recommended processes are realized, the potential for water odor and/or color generation in our customer's homes may be reduced.

When developing our response, we felt that it was necessary to consult with Dr. Levine to obtain her council on our application of her recommendations and to insure that our interpretation of her recommendations and our application of them was correct. We have provided her with draft cost estimation documents and draft answers to your questions as we were developing them to allow her to critique our work and to obtain her input. Based on our conversations with Dr. Levine she supports our positions as reported here.

 Dr. Levine's report presents an excellent overview of each of these technologies, therefore, we will not repeat that information here. Below, we provide our view of what advantages and disadvantages each of the processes proposed by Dr. Levine exhibit in Aloha's opinion:

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