

State of Florida



Public Service Commission

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

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

DATE: October 14, 2020

TO: Adam J. Teitzman, Commission Clerk, Office of Commission Clerk

FROM: Jefferson Doehling, Engineering Specialist, Division of Engineering *JD MR LK*

RE: Docket No. 20190170-WS - Application for transfer of facilities and Certificate Nos. 259-W and 199-S in Broward County from Royal Utility Company to Royal Waterworks, Inc.

Please file the attached October 13, 2020, email "data request response" and September 16, 2019, "Compliance Assistance Offer Letter" in the above mentioned docket file.

Thank you.

JD/jp

Attachments

Jeff Doehling

From: Troy Rendell <trendell@uswatercorp.net>
Sent: Tuesday, October 13, 2020 8:52 AM
To: Jeff Doehling
Subject: Fwd: FW: Royal Utility Co Inc Compliance Assistance Offer Letter
Attachments: Royal Utility Co Inc CAO Letter.pdf; PART P- STATE OF FLORIDACERTIFICATION OF FINANCIAL RESPONSIBLITY.pdf; PART D STATE OF FLORIDA STORAGE TANK CERTIFICATE OF INSURANCE.pdf

I found the e-mail about the fuel tanks being out of compliance. we had to do these items to get it certified.

----- Forwarded message -----

From: Candy Arnold <carnold@uswatercorp.net>

Date: Wed, Sep 18, 2019 at 11:06 AM

Subject: FW: Royal Utility Co Inc Compliance Assistance Offer Letter

To: Lina Quintero <lquintero@uswatercorp.net>, Sharon Purviance <spurviance@uswatercorp.net>, Mo Kader <mkader@uswatercorp.net>

Cc: Rudy Perez <rperez@uswatercorp.net>, Dennis Coates <dcoates@uswatercorp.net>, Troy Rendell <trendell@uswatercorp.net>

Good Morning Everyone,

Royal had an inspection done on Monday 9/16 by the county for the fuel storage tanks. Attached is a report on the violations we were cited for and an explanation for each. We have 15 days to respond on the progress of the violations. Below is what needs to be done to resolve the non-compliance issues:

- Fill cap needs to be painted yellow and labeled- Rudy will be working on getting the cap painted and labeled
- Exterior painting of storage tank- Rudy will be working on cleaning and painting the storage tank
- No FDEP placards on site- Placards are current through June 2020, but owner and account information needs to be updated with FDEP with USWSC information. Once information is updated, we need a copy of the placard to post at the plant- I believe Mo Kader was working on changing FDEP information?? Please confirm
- No forms Part D & Part P(Proof of insurance and proof of financial responsibility)- Sharon, are you able to complete the two forms and provide proof of insurance on fuel storage tanks? Attached are blank Part D & Part P forms.
- No registration form for new ownership- we need to contact the FDEP to update the owner information- I believe Mo Kader was working on changing FDEP information?? Please confirm

Please keep me posted on the progress of the above violations.

Thank you,

Candy Arnold

Program Coordinator

U.S. Water Services Corporation

954-422-7027

8900 NW 44th Court

Coral Springs, FL 33065

carnold@uswatercorp.net



www.uswatercorp.com

From: Williams, Aneese <ANEESEWILLIAMS@broward.org>
Sent: Monday, September 16, 2019 3:15 PM
To: 'rperez@uswatercorp.net' <rperez@uswatercorp.net>
Cc: 'carnold@uswatercorp.net' <carnold@uswatercorp.net>
Subject: Royal Utility Co Inc Compliance Assistance Offer Letter

Good Afternoon,

Attached is the Royal Utility Co Inc Compliance Assistance Offer Letter.

If you have any questions, don't hesitate to contact me.

Thanks,



ANEESE WILLIAMS, M.P.S., NATURAL RESOURCE SPECIALIST

Environmental Protection and Growth Management Department

ENVIRONMENTAL AND CONSUMER PROTECTION DIVISION

1 N University Dr, Suite 203 | Plantation, Florida 33324

954-818-7531 Cell ▪ 954-765-4804 Fax

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We value your feedback as a customer. You can comment on the quality of service you received by [completing our survey](#). Thank you!

Under Florida law, most e-mail messages to or from Broward County employees or officials are public records, available to any person upon request, absent an exemption. Therefore, any e-mail message to or from the County, inclusive of e-mail addresses contained therein, may be subject to public disclosure.



Environmental Protection and Growth Management Department
ENVIRONMENTAL AND CONSUMER PROTECTION
One North University Drive, Suite A203, Plantation, Florida 33324
954-519-1260 • Fax 954-765-4804

@BrowardECPD
@BrowardChildCareLicensing
@BrowardCountyEnvironment

September 16, 2019

Rudy Perez

Royal Utility Co Inc

8900 NW 44th Ct

Coral Springs, FL, 33065

RE: **Compliance Assistance Offer**

Royal Utility Co Inc, 8900 NW 44th Ct, Coral Springs, 33065

DEP Facility ID#: 8502843

Broward County – Storage Tank Program

Dear Rudy Perez,

A storage tanks inspection and file review were conducted at the above noted facility on or about *September 16, 2019*, by the Broward County Environmental and Consumer Protection Division, on behalf of the Florida Department of Environmental Protection. During the inspection and file review, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

Specifically, potential non-compliance with the requirements of Chapter 376 and 403, Florida Statutes, and *Chapter 62-762*, Florida Administrative Code (Fla. Admin. Code) was observed. Please see the attached inspection report for a full account of County observations and recommendations. We request you review the item(s) of concern and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

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

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings. Please address your response and any questions to *Aneese Williams* at 954-818-7531 or aneesewilliams@broward.org.

Sincerely,

A handwritten signature in black ink that reads "Aneese Williams".

Aneese Williams
Natural Resource Specialist
Enclosure:



Florida Department of Environmental Protection
 Twin Towers Office Bldg. 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400
 Division of Waste Management
 Petroleum Storage Systems
 Storage Tank Facility Routine Compliance Site Inspection Report

Facility Information:

Facility ID: 8502843	County: BROWARD	Inspection Date: 09/16/2019
Facility Type: C - Fuel user/Non-retail		
Facility Name: ROYAL UTILITY CO INC		# of inspected ASTs: 1
8900 NW 44TH COURT		USTs: 0
CORAL SPRINGS, FL 33065-1738		Mineral Acid Tanks: 0
Latitude: 26° 17' 1.4609"		
Longitude: 80° 14' 44.9193"		
LL Method: DPHO		

Inspection Result:

Result: Major Out of Compliance

Signatures:

TKBWNR - BROWARD COUNTY ENVIRONMENTAL PROTECTION DEPT (954) 519-1259

Storage Tank Program Office and Phone Number

Aneese J Williams

Rudy Perez

Inspector Name

Representative Name

Inspector Signature

Representative Signature

**Principal Inspector
 BROWARD COUNTY ENVIRONMENTAL
 PROTECTION DEPT**

**Operations Specialist
 Royal Waterworks**

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J requires Operator Training at all facilities by October 13, 2018. For further information please visit: <https://floridadep.gov/waste/permitting-compliance-assistance/content/underground-storage-tank-operator-training>

Financial Responsibility: Over Due

Financial Responsibility: INSURANCE

Insurance Carrier: ADMIRAL INSURANCE COMPANY

Effective Date: 12/18/2016

Expiration Date: 12/18/2017

Reviewed Records

Record Category	Record type	From Date	To Date	Reviewed Record Comment
Other	Current Local Government Permit, If Applicable	01/01/2019	09/16/2019	County License is current until 12/31/2020

Violations:

Type: Violation
 Significance: Minor
 Rule: 62-762.501(2)(f)2.
 Violation Text: Fillbox covers not marked according to requirements for shop fabricated tank systems.
 Explanation: The fill cap wasn't painted yellow and fill wasn't labeled diesel per API Standards.
 Corrective Action: Paint the fill cap yellow and place a diesel label on the fill, send a picture to me at aneesewilliams@broward.org

Type: Violation
 Significance: Minor
 Rule: 62-762.401(4), 62-762.401(4)(a), 62-762.401(4)(a)1., 62-762.401(4)(a)2., 62-762.401(4)(b), 62-762.401(4)(c), 62-762.401(4)(d), 62-762.401(4)(e), 62-762.401(4)(f), 62-762.401(4)(g), 62-762.401(4)(h), 62-762.401(4)(i)
 Violation Text: Registration fees not paid, placard not posted.
 Explanation: The placard shall be displayed in plain view in the office, kiosk, or at another suitable location at the facility where the storage tank system is located.
 Corrective Action: After the facility information has been updated, get a copy of the placard and post it, send a picture to me at aneesewilliams@broward.org

Type: Violation
 Significance: Minor
 Rule: 62-762.701(4)(c)
 Violation Text: Exterior Coatings not maintained to prevent corrosion for shop fabricated storage tank systems.
 Explanation: Excessive rust areas on the tank.
 Corrective Action: Clean, seal and paint the tank and send pictures to me at aneesewilliams@broward.org

Type: Violation
 Significance: SNC-B
 Rule: 62-762.421(2)
 Violation Text: Failure to maintain and demonstrate financial responsibility.
 Explanation: During the inspection, I didn't see Part D and Part P.
 Corrective Action: Once Part D and Part P are filled out, send them to me at aneesewilliams@broward.org

Type: Violation
 Significance: Minor
 Rule: 62-762.401(2)
 Violation Text: Registration Form not submitted for change in service or closure.
 Explanation: Since 7/31/2019 the facility has been under new ownership and management. Need to update information on the FDEP Storage Tank Facility Registration Form.
 Corrective Action: Update Facility, Account Owner and Real Property Owner Information on the FDEP Storage Tank Facility Registration Form, send the form to me at aneesewilliams@broward.org

Site Visit Comments

09/16/2019

Facility has been under new ownership and management since 7/31/2019. Facility has (1) 3,000 gallon diesel single-walled above ground storage tank. Tank is in concrete secondary containment. Tank has rusty areas that need to be repaired. Clean, seal and paint the tank. Tank is properly labeled. No leaks or spills on or around the tank. Piping is above ground, not in contact with soil. Tank has a fill cap that wasn't yellow and wasn't labeled. Paint the fill cap yellow and place a diesel label on the fill per API Standards. Tank has no fuel leveling gauge. Tank has no leak gauge for annular space monitoring. Facility utilizes the stick method to measure the tanks. The hoses are in good condition, no tears or holes. An impervious dike field area is designed to contain overfills, so no overfill testing is needed. The dike field is the tank's secondary containment, and the facility operator sticks the tank, so no release detection testing is needed. Reviewed cover page, sent a blank registration form. Since 7/31/2019 the facility has been under new ownership and management. Update Facility, Account Owner and Real Property Owner Information on the FDEP Storage Tank Facility Registration Form, send the form to me at aneesewilliams@broward.org Reviewed site diagram. Verified Coordinates. County license is current. FDEP placard is current, but wasn't posted. Upon receipt of payment of all applicable registration fees, each facility shall receive a registration placard, pursuant to Section 376.3077, F.S. The placard shall be displayed in plain view in the office, kiosk, or at another suitable location at the facility where the storage tank system is located. After the facility information has been updated, get a copy of the placard and post it, send a picture to me at aneesewilliams@broward.org Monthly visual inspections were started today. Facility operator is aware that he is required to visually inspect the storage tank system components every month (not to exceed every 35 days) and document the findings. The findings must be maintained for 3 years and made available for inspection by the Department or contracted county. Part D & P weren't available. I sent blank Part D and Part P forms, once filled both forms are filled out send back to me at aneesewilliams@broward.org Report sent to Rudy Perez rperez@uswatercorp.net

Inspection Photos

Added Date 09/16/2019

Royal Waterworks Sign



Added Date 09/16/2019

3,000 gallon diesel AST in secondary containment



Added Date 09/16/2019

Diesel Label



Added Date 09/16/2019

Fill: Cap Not Painted Yellow or Labeled



Added Date 09/16/2019

Rusty Areas



Added Date 09/16/2019

Rusty Areas



Added Date 09/16/2019

Rusty Areas

