

BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION
APPLICATION OF CURRITUCK WATER AND SEWER, LLC FOR
AUTHORITY TO TRANSFER THE SANDLER UTILITIES AT MILL RUN,
LLC WASTEWATER SYSTEM AND PUBLIC UTILITY FRANCHISE IN
CURRITUCK COUNTY, NORTH CAROLINA AND FOR APPROVAL OF
RATES

DOCKET NO. W-1333, SUB 0
DOCKET NO. W-1130, SUB 11

PRE-FILED DIRECT TESTIMONY

OF

BRITTNEY WILLIS

February 4, 2022

1 **Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

2 A. My name is Brittney Willis. I am employed by L.M. Sandler & Sons as a Senior
3 Project Manager, and my business address is 448 Viking Drive, Suite 220, Virginia
4 Beach, Virginia 23452. I have a Bachelor of Science degree in Civil Engineering
5 from the University of Virginia, and I am licensed as a Professional Engineer in
6 North Carolina, Virginia, South Carolina, Kansas, Missouri, and Washington. I am
7 also licensed as a dual-combined administrator in Stormwater Management and
8 Erosion and Sedimentation Control by the Virginia Department of Environmental
9 Quality. I have nearly fifteen years of technical and project management experience
10 in site design and stormwater management. My experience has been applied to
11 federal, commercial, residential, and utility infrastructure applications and projects.

12
13 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE NORTH**
14 **CAROLINA UTILITIES COMMISSION?**

15 A. No.

16
17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

18 A. The purpose of my testimony is to describe the Eagle Creek wastewater utility
19 system (“Eagle Creek Wastewater System” or “Wastewater System”), to explain
20 the recent problems with the Eagle Creek Vacuum Collection System, a component
21 of the Eagle Creek Wastewater System, and to describe Sandler Utilities at Mill

1 Run, LLC's ("Sandler Utilities" or "Sandler") efforts and investment to address
2 the Vacuum Collection System's problems by repairing and upgrading the system.

3

4 **Q. PLEASE DESCRIBE SANDLER UTILITIES.**

5 A. Sandler Utilities is the owner of the Eagle Creek Wastewater System, which serves
6 the Eagle Creek Subdivision, the Mill Run Golf and Country Club, and the
7 Moyock Middle School in Moyock, Currituck County, North Carolina. The Eagle
8 Creek Subdivision is a residential development that includes approximately 420
9 single-family homes, and is generally situated between Roland Creek Canal to the
10 north and Guinea Mill Run Canal to the south. Sandler Utilities currently provides
11 wastewater service to approximately 420 residential and two non-residential
12 customers in the Eagle Creek service area. Sandler Utilities does not provide water
13 utility service to the Eagle Creek service area. The Eagle Creek Wastewater System
14 is the only wastewater system or water system owned by Sandler Utilities.

15

16 **Q. PLEASE DESCRIBE THE EAGLE CREEK WASTEWATER SYSTEM.**

17 A. The Eagle Creek Wastewater System consists of a 350,000 gallons per day ("gpd")
18 extended aeration wastewater treatment plant that is currently limited to 175,000
19 gpd of flow until certain improvements are made to the wastewater treatment plant;
20 a Vacuum Collection System; a reuse spray irrigation system for spray irrigation
21 on the golf course owned by the Mill Run Golf and Country Club; an infiltration
22 storage pond; and an irrigation pond. It is the responsibility of the Mill Run Golf

1 and Country Club to operate and maintain the golf course irrigation system,
2 including the effluent disposal operations, at its cost, as required by the Contract
3 Addendum and Agreement dated June 20, 1997, between Tate Terrace Realty
4 Investors, Inc. and Mill Run Golf and Country Club, as assigned by Tate Terrace
5 Realty Investors, Inc. to Sandler Utilities, pursuant to an Assignment dated
6 November 7, 1997.

7
8 On March 5, 1999, the Department of Environmental Quality, Division of Water
9 Resources (“DWR”) issued permit number WQ0014306 to Sandler Utilities for
10 the construction and operation of a 350,000 gpd wastewater treatment plant.

11 On May 2, 2013, DWR issued a non-discharge permit (permit number
12 WQCS00290) (“Collection System Permit”) to Sandler Utilities for operation of
13 the Vacuum Collection System. The Collection System Permit allows for spray
14 irrigation of 175,000 gpd of treated effluent onto the Mill Run Golf and Country
15 Club golf course and disposal of 90,000 gpd of treated effluent into the infiltration
16 pond.

17
18 **Q. PLEASE DESCRIBE THE EAGLE CREEK VACUUM COLLECTION**
19 **SYSTEM.**

20 A. The Eagle Creek Vacuum Collection System consists of 4.8 miles of vacuum sewer,
21 and it utilizes vacuum pumps to maintain a constant negative pressure within the
22 sewer pipes. The wastewater from the individual homes in the Eagle Creek

1 Subdivision that are connected to the Wastewater System collects in containment
2 vessels, commonly referred to as the “pits,” with each pit located near the property
3 lines and serving two homes. When the level of wastewater within the pit reaches
4 a determined level, pneumatic pressure triggers the opening of a valve to the piping
5 connected to the sewer line. The vacuum then withdraws wastewater from the pit
6 into the sewer line. When the wastewater level within the pit drops, the valve
7 connecting the pit to the sewer line is closed, which allows the wastewater to again
8 collect within the pit and maintain the vacuum in the sewer line.

9

10 **Q. IN ADDITION TO THE EAGLE CREEK VACUUM COLLECTION**
11 **SYSTEM, ARE YOU AWARE OF OTHER VACUUM COLLECTION**
12 **SYSTEMS IN NORTH CAROLINA OR VIRGINIA?**

13 A. The Eagle Creek Vacuum Collection System was the first vacuum collection
14 system to be regulated by the North Carolina Utilities Commission
15 (“Commission”). In addition to the Eagle Creek Vacuum Collection System, it is
16 Sandler Utilities’ understanding that the City of New Bern, North Carolina installed
17 a vacuum collection system from the same vacuum collection system vendor
18 (AirVac) that installed Sandler Utilities’ Vacuum Collection System, and that the
19 City of Virginia Beach, Virginia and the City of Suffolk, Virginia utilize vacuum
20 collection systems. It is also Sandler Utilities’ understanding that the Town of Oak
21 Island in Brunswick County, North Carolina utilizes a vacuum collection system.

22

1 **Q. WHEN DID SANDLER UTILITIES RECEIVE A CERTIFICATE OF**
2 **PUBLIC CONVENIENCE AND NECESSITY FROM THE COMMISSION?**

3 A. On September 7, 1999, in Docket No. W-1130, Sub 0, the Commission issued a
4 Certificate of Public Convenience and Necessity to Sandler Utilities that became
5 final on September 14, 1999.

6
7 **Q. IN ADDITION TO BEING THE OWNER OF THE EAGLE CREEK**
8 **WASTEWATER SYSTEM, IS SANDLER UTILITIES THE OPERATOR**
9 **OF THE SYSTEM?**

10 A. No. Sandler Utilities has never operated the Eagle Creek Wastewater System.
11 Instead, Sandler Utilities hires contract operators to operate the system. Since the
12 beginning of operations of the Wastewater System, there have been only two
13 contract operators: William G. Freed, Inc. dba/ Enviro-Tech (“Enviro-Tech”) and
14 EnviroLink, Inc. (“EnviroLink”). The contract operators operate both the wastewater
15 treatment plant and the Vacuum Collection System. (However, as discussed below,
16 Flovac, another vacuum collection system vendor, recently began monitoring the
17 Vacuum Collection System and providing reports to Sandler Utilities on
18 observations and recommendations for the Vacuum Collection System.)

19
20 **Q. PLEASE DESCRIBE THE PREVIOUS OPERATOR OF THE EAGLE**
21 **CREEK WASTEWATER SYSTEM AND THE CURRENT OPERATOR**
22 **OF THE WASTEWATER SYSTEM.**

1 A. Enviro-Tech had been the certified operator for the Eagle Creek Wastewater
2 System from the beginning of operations of the system until February, 2020. On
3 February 6, 2020, William Freed formally notified Sandler Utilities that his
4 wastewater operations company had been acquired by Envirolink, a water and
5 wastewater management company, and that Envirolink would be the company that
6 would operate the Eagle Creek Wastewater System. William Freed stated that he
7 would assist in the transition of services to Envirolink, but that he would otherwise
8 not be involved in the continued operation of the Wastewater System.

9
10 Michael J. Myers is the President of Envirolink, and he is also an officer of
11 Currituck Water and Sewer, LLC (“Currituck Water & Sewer”). Sandler Utilities
12 and Envirolink entered into a Utility Management Service Agreement dated
13 January 6, 2021 for Envirolink to operate the Eagle Creek Wastewater System,
14 including the Vacuum Collection System, for an initial term of five years with five-
15 year renewal terms.

16
17 **Q. HAS THE EAGLE CREEK WASTEWATER SYSTEM EXPERIENCED**
18 **OUTAGES AND SANITARY SEWER OVERFLOWS?**

19 A. Yes. Sandler Utilities sincerely regrets that the Eagle Creek Wastewater System has
20 experienced a number of outages and sanitary sewer overflows, the vast majority
21 of which occurred beginning in September of 2020. Sandler Utilities has made
22 substantial investment in repairs and capital improvements in the Wastewater

1 System—in particular in the Vacuum Collection System—to remedy the Vacuum
2 Collection System’s problems and to ensure that the Wastewater System will
3 function properly and reliably and in compliance with all regulatory and
4 environmental regulations.

5
6 **Q. PLEASE DESCRIBE THE COMPLIANCE ISSUES AND SANITARY**
7 **SEWER OVERFLOWS THAT OCCURRED WHEN ENVIRO-TECH**
8 **OPERATED THE SYSTEM.**

9 A. There were isolated compliance and environmental issues with the Eagle Creek
10 Wastewater System when Enviro-Tech operated the system (prior to February
11 2020). The isolated problems occurred when pits that are part of the Vacuum
12 Collection System filled with rainwater during extremely heavy rain events, like
13 hurricanes, which resulted in a loss of vacuum of the Vacuum Collection System.
14 For example, during an extreme rain event in 2015, sewage backed up in homes
15 when the sewage was not able to drain into the system. The Vacuum Collection
16 System also malfunctioned during Hurricane Matthew in October of 2016. Another
17 compliance issue occurred in 2015 when the second bank of UV disinfection for
18 the wastewater treatment plant was not operational.

19
20 On December 11, 2015 in Docket No. W-1130, Sub 8, the Commission issued a
21 Recommended Order Granting Rate Increase, Requiring Refund, and Customer

1 Notice (“December 11, 2015 Order”) that directed Sandler Utilities to address the
2 compliance issues. In Ordering Paragraphs 4 and 5, the Commission stated:

3 4. That Sandler shall: (a) within 60 days of the effective date of this order,
4 physically inspect every Air Vac valve pit package as to whether the pit
5 package is subject to rain water intrusion during heaving rains; (b) within
6 150 days of the effective date of this order, complete renovations to
7 reduce the rain water intrusion, including but not limited to raising and
8 sealing pit packages subject to rain water intrusion; (c) within 180 days
9 of the effective date of this order, file a written report with the
10 Commission describing the completed renovations for each of the pit
11 packages where renovations were necessary.

12 5. That Sandler shall within 180 days of the effective date of this order,
13 complete renovations to the second bank of UV lights at the wastewater
14 treatment plant to bring the UV system in compliance with North
15 Carolina Department of Environmental Quality, Division of Water
16 Resources regulations.

17
18 Enviro-Tech filed the required report in the docket on May 9, 2016. In the report,
19 Enviro-Tech stated that all of the valve pit packages had been inspected, and
20 Enviro-Tech confirmed that the repairs and renovations to the UV system of the
21 wastewater treatment plant were completed in February, 2016 and that the
22 Wastewater System had been functioning properly since that time. As part of the

1 overall inspection of the Vacuum Collection System, Enviro-Tech ranked the pits
2 on a scale of 1 to 5 (with ranking 5 being the most problematic due to risk of
3 flooding). In particular, pits with level 4 rankings were pits with lids below grade
4 with a high chance of flooding, and pits with level 5 rankings were pits with lids
5 below grade that are close to a ditch and have been underwater in the past. Enviro-
6 Tech performed remedial work on the most problematic pits by extending the tops
7 of the pits to elevations in order to reduce the risk of flooding.

8
9 In its report, Enviro-Tech provided the following explanation as to the reasons for
10 the problems with the Vacuum Collection System:

11 There are various reasons for valves sticking open, but the real problem was
12 that when a valve stuck open in this area the operator could only isolate
13 down to about 50 possible pits. As shown on the attached map, two new
14 isolation valves were added in late December 2015, one at each end of
15 Eagleton Circle. The addition of these two isolation valves has enabled the
16 operators to isolate down to about 25 possible pits. Understand that a valve
17 can stick open for various reasons, some caused by users, some by valve
18 failures and some by flooding. One will never eliminate the causes of valve
19 failures, however the additional isolation valves have enabled us to find the
20 failed valve and correct it much quicker avoiding the cascading failure
21 caused by low vacuum for extended periods of time. The ability to find and
22 correct an open valve is truly the corrective action needed to make this

1 system more reliable. While Enviro-Tech and Sandler Utilities at Mill Run
2 will continue to improve the system to the benefit of the customers, I do
3 believe there are some other factors that should be considered. The Utility
4 or its operator is going to reach out to Currituck County along with the Eagle
5 Creek HOA to inquire about storm water issues and resolution of drainage
6 issues. It should not go without saying that while the Airvac System may be
7 less than perfect, a contributing factor to the struggles is storm water
8 management and or rainfall pattern changes. The ditches and streets flood
9 much more often than in prior years and stay full for a longer period of time.
10 There is a ditch pump on one end of the development that functions properly
11 and provides the desired result, however on the Eagleton Circle end of the
12 community, the storm water flow is by gravity to drainage ditches offsite. I
13 am not sure if the apparent change in drainage is due to recent rainfall
14 variations or if there is an impediment to drainage that has not existed in
15 years prior.

16
17 Within a 24-month period after receipt of the Commission's December 11, 2015
18 Order, Sandler Utilities performed the following upgrades to the Vacuum
19 Collection System to address the compliance issues: 99 upgraded controllers were
20 installed throughout the Eagle Creek Subdivision; 6 upgraded valves were installed;
21 6 valve and controller combinations were installed; 1 new controller and surge
22 suppressor was installed; and 4 new valve pits were installed.

1

2 **Q. PLEASE DESCRIBE THE COMPLIANCE ISSUES AND SANITARY**
3 **SEWER BACKUPS THAT HAVE OCCURRED SINCE ENVIROLINK**
4 **BEGAN OPERATING THE SYSTEM.**

5 A. Envirolink began operating the Wastewater System in February of 2020 after it
6 purchased Enviro-Tech from William Freed. There have been significant problems
7 with the Vacuum Collection System beginning in September of 2020 that caused
8 outages and sanitary sewer overflows into residents' homes and yards on multiple
9 occasions. The first outage of the Vacuum Collection System was protracted and it
10 occurred from September 27, 2020 until October 11, 2020. The outage was due to
11 the failure of one of the two vacuum pumps, which resulted in sanitary sewer
12 overflows that drained into stormwater swales in front of and between homes.
13 Additional outages and sanitary sewer overflows occurred in the remainder of 2020
14 and in 2021.

15

16 As part of its initial response to the unprecedented outages in the fall of 2020,
17 Sandler Utilities arranged for Flovac to come to Eagle Creek on November 20, 2020
18 to provide training to Envirolink's technicians and operators about remedial
19 measures, such as how to remove water from the valves before installing new
20 controllers. In addition, and pursuant to the Operator Training Plan in place with
21 DWR, Sandler Utilities arranged for Flovac to provide a 3-day training course of
22 Envirolink's technicians and operators in September of 2021 and a second 3-day

1 training course to Envirolink from October 5 through 8, 2021. Flovac’s training of
2 Envirolink’s employees was focused on best practices in locating leaks in the
3 Vacuum Collection System and how to properly operate, maintain, and repair the
4 system. Sandler Utilities obtained recommendations from Flovac about necessary
5 repairs and upgrades to the Vacuum Collection System to ensure that the system
6 would operate properly and reliably, and made upgrades to the system based upon
7 Flovac’s recommendations.

8
9 Sandler Utilities has substantially invested in upgrades to the Vacuum Collection
10 System—in the amount of about \$673,834 since 2020—again to ensure that the
11 system would operate properly and reliably.

12
13 **Q. IN RESPONSE TO THE OUTAGES AND SANITARY SEWER**
14 **OVERFLOWS THAT HAVE OCCURRED SINCE SEPTEMBER OF 2020,**
15 **HAS THE STATE OF NORTH CAROLINA TAKEN ACTION AGAINST**
16 **SANDLER UTILITIES?**

17 **A.** Yes. Sandler Utilities has been subject to various enforcement actions by DWR
18 related to the outages and sanitary sewer overflows since September of 2020. DWR
19 has issued Notices of Violation and Notices of Intent to Enforce and has assessed
20 civil penalties against Sandler Utilities. On March 10, 2021, the State of North
21 Carolina, *ex rel.*, the North Carolina Department of Environmental Quality served
22 Sander Utilities with a Complaint related to the outages and sanitary system

1 overflows that had occurred beginning in September of 2020. The Complaint was
2 filed in Currituck County Superior Court (Superior Court Division 21 CVS 78).

3
4 Sandler Utilities and the State entered into a Consent Judgment filed on July 1,
5 2021, to resolve the matters in controversy between them in the lawsuit. Among
6 others, the Consent Judgment required Sandler Utilities to submit an engineering
7 evaluation of the Vacuum Collection System and, with DWR's review, comment,
8 and approval, implement an Operator Training Plan for Envirolink's operators, an
9 Interim Service and Restoration Plan, and a System Upgrade Plan. Each of these
10 plans was timely submitted, commented upon by DWR, and ultimately approved
11 with required revisions. These submissions, meetings with DWR, and approvals
12 were complete by mid-October of 2021 and the implementation of the Consent
13 Judgment plans began right away. These efforts included, among others, providing
14 on-site training for the system operator's employees, investment in physically
15 relocating controllers outside of pits to improve performance, replacement of
16 unreliable equipment, stocking of replacement parts, and detailed maintenance
17 schedules.

18
19 Notwithstanding Sandler Utilities' significant financial investment and concerted
20 efforts to comply with the Consent Judgment's requirements, the Eagle Creek
21 Vacuum Collection System again experienced outages and service issues in
22 October and November of 2021. As a consequence, the State filed a Motion to

1 Show Cause why Sandler Utilities Should Not be Held in Contempt in the lawsuit
2 related to those outages and service issues. Sandler Utilities was subject to a Show
3 Cause proceeding on December 6, 2021. The Court did not find contempt, but
4 directed the State and Sandler Utilities to revisit their Consent Judgment to attempt
5 to fashion a better framework for improved performance of the Eagle Creek
6 Vacuum Collection System.

7
8 On December 28, 2021, an Amended Consent Judgment was filed with the Court.
9 This revised version incorporated the prior requirements from the Consent
10 Judgment and added requirements for: mandatory responses to resident complaints
11 and communication with residents concerning operational status, including
12 timeframes and a log to show compliance; a new independent engineering
13 evaluation to be performed by a DWR-approved engineer; a new System Upgrade
14 Plan in accordance with the new engineering report; and appointment of a DWR-
15 approved independent specialist to perform a minimum 30-day on-site consultation
16 regarding the operation of the Vacuum Collection System (and to provide a report
17 thereafter with recommendations and observations).

18
19 As required by the Amended Consent Judgment, Sandler Utilities submitted David
20 Rigby, P.E., as the engineer to perform the new evaluation of the Vacuum
21 Collection System, which has been approved by DWR, and Flovac to act as the
22 independent specialist to monitor operation of the system. As of the date of this

1 testimony, Mr. Rigby is in process of performing the new engineering evaluation,
2 and Flovac is on-site at the Eagle Creek Subdivision to perform the required
3 consultation on operations. Sandler Utilities is in full compliance with the terms of
4 the Amended Consent Judgment as of the date of this testimony, and is hopeful that
5 the improved operational reliability over the last month is the start of a new trend
6 where the benefits of the substantial investments made at Eagle Creek to upgrade
7 the physical infrastructure since September 2020 will become apparent.

8

9 **Q. HAS SANDLER UTILITIES MADE REPAIRS AND CAPITAL**
10 **INVESTMENT IN THE WASTEWATER SYSTEM IN COMPLIANCE**
11 **WITH THE CONSENT JUDGMENT?**

12 A. Yes. Sandler Utilities has made substantial investment in repairs and upgrades to
13 the Wastewater System, and especially to the troubled Vacuum Collection System.
14 Sandler Utilities has made the investment in the Vacuum Collection System both
15 before the consent judgements were entered into and in compliance with the
16 consent judgments. Sandler Utilities has made the following tremendous
17 investment in the Wastewater System in 2020 and 2021: Sandler Utilities invested
18 \$241,794.42 in the Vacuum Collection System in 2020 and \$432,039.08 in 2021
19 and 2022. Sandler Utilities' total investment in the Eagle Creek Wastewater System
20 in 2020, 2021, and 2022 is about \$673,834. Sandler Utilities is continuing to invest
21 in the Wastewater System to ensure that the system will be safe and reliable and be
22 in full compliance with the Amended Consent Judgment's mandate to undertake to

1 address “necessary upgrades to the design and physical infrastructure of the
2 [Vacuum] Collection System.”

3

4 **Q. PLEASE DESCRIBE THE REPAIRS AND UPGRADES TO THE**
5 **WASTEWATER SYSTEM THAT HAVE BEEN MADE IN 2020, 2021, AND**
6 **2022.**

7 A. The following are some of the repairs and upgrades that Sandler Utilities made to
8 the Vacuum Collection System beginning in 2020:

9 • Sandler replaced the pump in the wastewater treatment plant in December
10 of 2020.

11 • For the period of August of 2020 through January 24, 2022, Sandler
12 Utilities had Envirolink rebuild or replace 2,163 valves and 3,081
13 controllers. (The new controllers are capable of processing small amounts
14 of water and can be submerged in water up to 5 feet with no impact to
15 performance.) This work equates to rebuilding or replacing 4 valves per
16 day and 5.7 controllers per day.

17 • For the period from October 1, 2021 through January 24, 2022, Sandler
18 Utilities had Envirolink rebuild or replace 118 pedestal-mounted
19 controllers and 21 valves. This work equates to repairing or replacing 0.2
20 valves per day and 1 controller per day.

21 • As of January 24, 2022, Sandler Utilities had Envirolink install 110
22 elevated (pedestal-mounted) controllers. Sandler Utilities is continuing to

1 install elevated controllers throughout the Eagle Creek Subdivision. The
2 purpose of the pedestal mounts is to elevate them in order to reduce
3 rainwater intrusion of the controllers and thus minimize any flooding of the
4 valve pits.

- 5 • Sandler Utilities installed alarms at the vacuum station and the valve pits.
- 6 • On November 30, 2021, Flovac installed a remote monitoring system that
7 was placed in service on December 1, 2021 for the cost of \$28,874.50. The
8 monitoring system was installed on the vacuum station, six pits on dead-
9 end lines, and one additional pit located on St. Andrews Road. The
10 monitoring system provides the following input and output information for
11 the vacuum station and six pits located on dead end lines and one pit located
12 on St. Andrews, respectively:
 - 13 ○ Vacuum Station Inputs and Outputs: tank vacuum; tank level;
14 sewage pump run-times and start and stop times; vacuum pump
15 run-times and start and stop times; rainfall monitor; and alarm
16 status.
 - 17 ○ Vacuum station alarms: tank vacuum; vacuum pump run-time
18 alarm; high level alarm; and communication.
 - 19 ○ Pit Inputs and Outputs at Dead Ends: vacuum; level activations;
20 activation duration; and alarm status.
 - 21 ○ Pit Alarms at Dead Ends: level vacuum and communication.

- 1 ○ Pit Inputs and Outputs at St. Andrews Road: level vacuum;
2 activations; activation duration; and alarm status.
- 3 ○ Pit Alarms at St. Andrews Road: level vacuum and
4 communications.

- 5 • After installation of the remote monitoring system, Flovac conducted
6 training for Envirolink personnel to demonstrate the features of the system
7 and explain how to interpret the information displayed on the graphs
8 created by the monitoring system.
- 9 • On January 31, 2022, Flovac began installing a remote monitoring system
10 on the valve pits (each pit on the 8-inch main and additional sensors on the
11 10-inch main), along with two additional monitors on the collection lines.
12 The remote monitoring system with the additional monitors will ensure
13 that the Vacuum Collection System is reliable. The monitoring system
14 allows multiple people to remotely monitor the vacuum flow status of the
15 lines so that any possible leaks that might occur on the lines will be
16 identified quickly. This expedient identification of any possible leaks on
17 the collection lines will ensure that the contract operators may address the
18 leaks quickly and before any homeowners might be affected. The cost of
19 the remote monitoring system is \$195,297.69. Installation of the remote
20 monitoring system on the valve pits began on February 2, 2022 and will be
21 completed on March 10, 2022. As part of this monitoring effort, and again
22 in conjunction with compliance with the Amended Consent Judgment,

1 Flovac is monitoring the Vacuum Collection System and is providing
2 reports to Sandler Utilities on observations and recommendations for the
3 system.

- 4 • Sandler Utilities is planning to install a control panel replacement in the
5 amount of \$70,000.
- 6 • In addition to the capital improvements to the Wastewater System, Sandler
7 Utilities has directed Envirolink to provide necessary maintenance and
8 preventative maintenance to the system.

9

10 **Q. IN LIGHT OF THE UPGRADES THAT SANDLER UTILITIES HAS MADE**
11 **TO THE VACUUM COLLECTION SYSTEM, IS THE EAGLE CREEK**
12 **WASTEWATER SYSTEM OPERATING SAFELY AND RELIABLY?**

13 A. Sandler Utilities has invested substantial funds since 2020 to upgrade the Vacuum
14 Collection System. While Sandler Utilities has additional work to do to fully
15 comply with the Consent Judgment, Sandler Utilities believes that its current
16 investment in the Vacuum Collection System once the monitoring system has been
17 fully installed has already transformed the system into a safe and reliable system.
18 The additional improvements to the Vacuum Collection System required by the
19 Consent Judgment will provide more assurance of the safe and reliable operation
20 of the Wastewater System to the Eagle Creek Subdivision. The residents of the
21 Eagle Creek Subdivision deserve a safe and properly operated Wastewater System.

22

1 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

2 A. Yes, at this time.

3