

Daniella Levine Cava, Mayor

Water and Sewer
PO Box 330316 • 3071 SW 38 Avenue
Miami, Florida 33233-0316
T 305-665-7471

miamidade.gov

July 25, 2025

VIA ELECTRONIC CORRESPONDENCE

CCN: 65966
File No: 8.DC.20.52

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Tom Mariani
Washington, D.C. 20044-7611
RE: DOJ No. 90-5-1-1-4022/1
Tom.Mariani@usdoj.gov

Chief, Clean Water Enforcement Branch
Water Protection Division
Attn: Brad Ammons
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Ammons.Brad@epa.gov

Rachael Amy Kamons
Environmental Enforcement Section
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611
Rachael.Kamons@usdoj.gov

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Sirena.Davila@dep.state.fl.us

**RE: Consent Decree (Case: No. 1:12-cv-24400-FAM),
Reference DOJ Case No. 90-5-1-1-4022/1,
Section IX – Paragraph 52 – Delay,
Section XVII, Paragraph 77– Notices, Request to Waive Potential Stipulated Penalties for Consent
Decree Appendix D-2, Capital Improvement Project 1.2 Oxygen Production at the SDWWTP**

Dear Sir or Madam:

The purpose of this letter is to request that the United States Environmental Protection Agency (EPA) and Florida Department of Environmental Protection (FDEP) waive potential stipulated penalties, if any, associated with the delays to project completion of Consent Decree (CD) Capital Improvement Project (CIP) 1.2, Oxygen Production (the "Project") at the South District Wastewater Treatment Plant (SDWWTP). Per CD Appendix D, CD 1.2 involves the replacement and retrofit of existing air compression units.

The construction contract expanded the scope and included a new electrical building housing two (2) substations, installation of a new 125-ton centrifugal compressor (No. 4), decommissioning of two 80-ton compressors (No. 1 and No. 2), and upgrade of an existing compressor from 100-ton to 125-ton (No. 3). The project was slated for completion by the February 25, 2022 compliance date, but due to several force majeure and unforeseen events, the project was completed 567 days beyond the compliance date.

The history related to the force majeure and unforeseen circumstances that impacted timely completion of CD 1.2 by the CD deadline were:

1. During excavation, the contractor discovered the new duct bank could not be installed over the existing duct bank, as originally planned, because it was too shallow. This required demolition of the existing duct bank, redesign of the electrical system, and delayed foundation installation, which resulted in a 35-day delay.
2. COVID-19 supply chain disruptions – Labor shortages and manufacturing delays significantly impacted the fabrication and delivery of electrical components and compressor replacement parts, which contributed to a 335-day force majeure delay (Exhibit A).
3. On June 30, 2021, the County provided written notification that delays in construction might affect the compliance deadline of February 25, 2022 (Exhibit B).
4. In January 2022, the replacement parts manufacturer for Compressor No. 3 informed the County that the lead time for fabrication and delivery of mechanical components was delayed with no opportunity to expedite. Procurement and installation of the mechanical components resulted in a 347-day force majeure delay.
5. On February 25, 2022, the County submitted a Failure to Meet Compliance Date Notification due to delays related to unforeseen field conditions, relocation of existing duct banks, and extended procurement schedules caused by pandemic-related manufacturing disruptions (Exhibit C).

Despite these delays, the County closely monitored progress, implemented mitigation measures, and worked diligently to minimize further impacts.

Request for Relief

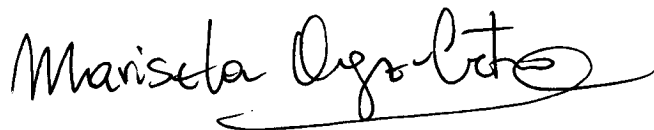
The continued efforts and mitigating actions by the County to limit project delays resulted in Substantial Completion on September 15, 2023—567 days past the EPA compliance date.

Given that the County upgraded the Oxygen Production facilities and associated electrical equipment beyond the required scope to provide reliable and redundant oxygen production at the SDWWTP and put forth its best effort to mitigate delays, the County respectfully requests relief from stipulated penalties associated with missing the Project deadline. The County remains committed to fulfilling its Consent Decree obligations and appreciates EPA and FDEP's consideration in this matter.

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

Should you have any questions regarding this matter, please call me at (786) 552-8894.

Sincerely,

A handwritten signature in black ink, reading "Marisela Aranguiz-Cueto". The signature is fluid and cursive, with a long horizontal flourish extending from the end of the name.

Marisela J. Aranguiz-Cueto, P.E.
Deputy Director
Miami-Dade Water and Sewer Department

Attachments: Exhibits A–C

Request to Waive Potential Stipulated Penalties for CD 1.2 Oxygen Production

July 25, 2025

Page 4

ec:

Anita Patel
Senior Assistant Attorney General, Complex Litigation
Office of the Attorney General
PL 01 The Capitol
Tallahassee, FL 32399-1050
(850) 414-3694
anita.patel@myfloridalegal.com

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Viviana.Useche@Florida.DEF.gov
Lisa.M.Self@dep.state.fl.us
Jonathan.Odjo@FloridaDEF.gov
Sed.wastewater@dep.state.fl.us
Antonio.Pernas@floridaDEF.gov
Henry.Webster@floridaDEF.gov

Paul Schwartz
Associate Regional Counsel
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303
Schwartz.Paul@epa.gov

Roy Coley, Office of the Mayor
Miami-Dade County
111 NW 1st Street 29th Floor
Miami, FL 33128
Roy.Coley@miamidade.gov

Sarah Davis
Miami-Dade Assistant County Attorney
Miami-Dade County Attorney's Office
111 NW First Street Suite 2810
Miami, Florida 33128
Sarah.Davis@miamidade.gov

Amanda Kinnick
Billie Jo McCarley (WASD)
Frances G. Morris (WASD)
James B. Ferguson (WASD)
Juan Curiel (WASD)

Elizabeth Teegen
Chief Assistant Attorney General, Complex Litigation
Office of the Attorney General
PL-01, The Capitol
Tallahassee, FL 32399-1050
850-414-3808
Elizabeth.Teegen@myfloridalegal.com

Jairo Castillo-Valenzuela
Andrew Gunderson
Wastewater Enforcement Section
Water Enforcement Branch
Enforcement & Compliance Assurance Division
USEPA Region 461 Forsyth Street. S.W.
Atlanta, GA 30303
Castillo.Jairo@epa.gov
Taylor.melchilecee@epa.gov

Madame Mayor Daniella Levine-Cava
Miami-Dade County
111 NW First Street 29th Floor
Miami, Florida 33128
Daniella.Cava@miamidade.gov

Jay J. Fink, Director
Miami-Dade Water and Sewer Department
3071 SW 38th Avenue
Miami, Florida 33146
Jay.Fink@miamidade.gov

Catalina Lopez-Velandia (WASD)

François Saint-Phard (WASD)

Miguel Jimenez (WASD)

Carlos A. Castro (WASD)

Rolando Roque (WASD)

Ana Caveda (WASD)

Christine Wartman (WASD)

Jose Ortega (CAO)

Katherine Sanchez (CAO)

Lisa Spadafina (RER-DERM)

Rashid Istambouli (RER-DERM)

Galo Pacheco (RER-DERM)

Roger Williams (CD PMCM)

Exhibit A



Poole & Kent Company of Florida
1781 N.W. North River Drive
Miami, FL 33125
P.O. Box 420556
Miami, FL 33242

Phone: 305.325.1930
Fax: 305.324.0522

April 7, 2020

Miami-Dade Water and Sewer Department
c/o South District Wastewater Treatment Plant
23300 SW 97th Avenue
Miami, FL 33190

Attn: David A. Campbell

Re: CD 1.02 Oxygen Production Upgrades - SDWWTP
WASD Contract S-882R, P&K Job No. 18609
Notice of Delay and Notice of Impact – Novel Coronavirus Disease 2019 (COVID-19)
– Dixie Metal Products, Inc. – Delay/Impact

Mr. Campbell,

As a follow up to our letter dated March 18, 2020, Poole & Kent received notification from our Metals vendor (Dixie Metal Products, Inc.) of impact/delay due to the above referenced pandemic. In accordance with Article 8 and Article 11 of the General Terms and Conditions, Poole & Kent is issuing formal notice for any delays and impacts which may be attributable to COVID-19. Until such a time that the full effect of COVID-19 upon the Project is known, Poole & Kent is reserving its rights to submit a claim in accordance with the Contract Documents and to be compensated for all cost and time adjustments allowable by the Contract Documents.

As you are aware, the situation is constantly evolving and beyond our reasonable control. We are committed to remain in communication with you and trust that you will do the same with us. We want to get back to normal work activities as soon as possible after these unprecedented circumstances have passed. In the meantime, if you have concerns regarding our approach, please contact me.

Sincerely,

Poole & Kent Company of Florida

Kevin Smith
Vice President



DIXIE METAL PRODUCTS, INC

442 SW 54th Court
Ocala, Florida 34474-1893

www.dixiemetals.com

(352) 873-2554
Fax (352) 873-2557

NOTICE TO GENERAL CONTRACTOR OF POTENTIAL DELAY

Re: COVID-19 and Notice of Potential Delay

Dear Friends and Customers,

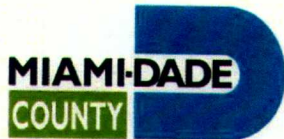
Pursuant to our Subcontract or Purchase Order, we are here by notifying you that we reasonably anticipate a Delay, which includes a force majeure event like the Coronavirus pandemic. As you all know, the information from the CDC, World Health Organization and Federal, State and local government authorities is changing almost hourly. While Dixie Metal Products, Inc. has not currently experienced any impact, as the COVID-19 (Coronavirus) health emergency continues to evolve, we have growing concerns regarding its future impact on our labor force and disruptions to timely delivery of material. We will certainly continue to keep you apprised of any issues that may develop during these uncertain times and would welcome the opportunity to work together to develop risk avoidance and mitigation strategies with you and the Owner.

Dixie Metal Products, Inc. reserves all rights that it has under the Subcontract or Purchase Order to an extension of time for delay that is caused by this Force Majeure event.

Respectfully,

Dixie Metal Products, Inc.

Exhibit B



miamidade.gov

Water and Sewer
PO Box 330316 • 3071 SW 38 Avenue
Miami, Florida 33233-0316
T 305-665-7471

VIA ELECTRONIC CORRESPONDENCE

July 14, 2021

CCN: 63938
File No: 8.DC.21.52

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Tom Mariani
Washington, D.C. 20044-7611
RE: DOJ No. 90-5-1-1-4022/1
Tom.Mariani@usdoj.gov

Chief, Clean Water Enforcement Branch
Water Protection Division
Attn: Brad Ammons
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Ammons.Brad@epa.gov

Rachael Amy Kamons
Environmental Enforcement Section
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611
Rachael.Kamons@usdoj.gov

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Jason.Andreotta@dep.state.fl.us

**RE: Consent Decree (Case: No. 1:12-cv-24400-FAM),
Reference DOJ Case No. 90-5-1-1-4022/1,
Section XI, Paragraph 52 – Potential Delay,
Section XVII, Paragraph 77 – Notices, Failure to Meet Compliance Date and Update
on Delay for Consent Decree Appendix D-2, Capital Improvement Projects SDWWTP
1.2 Oxygen Production**

Dear Sir or Madam:

In accordance with the provisions of Section XI, Paragraph 52 of the above-referenced Consent Decree (CD), on June 30, 2021, Miami-Dade County (County) notified electronically, the United States Environmental Protection Agency (EPA) and Florida Department of Environmental Protection (FDEP) of a potential delay of CD Capital Improvement Project (CIP) 1.2 Oxygen Production at South District Wastewater Treatment Plant (SDWWTP). As a result, this project experienced delays during the construction phase that may impact the Project CD compliance date of February 25, 2022.

In accordance with Section XI, Paragraph 52, this update letter shall further describe and explain: the reasons for the delay; the anticipated duration of the delay; all actions are taken or to be taken to prevent or minimize the delay; a schedule for implementation of any measures to be taken to prevent or mitigate the delay or the effect of the delay; the County's rationale for attributing such

delay to a force majeure event if it intends to assert such a claim; a statement as to whether, in the opinion of the County, such an event may cause or contribute to the endangerment of public health or the environment, and documentation to support the force majeure claim.

Background

The CD project description is the replacement and retrofit of existing air compression units.

The Notice to Proceed for this project was issued to the Contractor on January 7, 2019, with a Contract Duration to Construction Completion of 770 days (February 15, 2021) and Substantial Completion of 840 days (April 26, 2021). The project consists of upgrades to the SDWWTP's cryogenic oxygen generation facilities, including installing a new 125-ton Compressor No. 4 and upgrading and overhauling existing Compressor No. 3 from 100-tons to 125-tons. These modifications will allow the plant to meet current and future capacity requirements and provide for redundancy. The completed project will also provide an expanded and upgraded Oxygen Production Facility to include a new resilient Electrical Building.

Explanation and description of the reasons for the delay

To date, several delays have been encountered during the construction of this project:

1. On April 25, 2019, during verification of the existing field conditions, it was discovered that the portion of the existing electrical duct bank was going to remain too shallow and 6-feet further east than shown on the contract drawings. This situation created a conflict with the foundation of the new electrical building because it did not allow for appropriate top coverage of the new duct bank that was expected to be built over top of the existing one. As a result, the existing duct bank was demolished and relocated before installing the new duct bank.
 - Anticipated duration of the delay:
A 35-day time extension was provided to the Contractor due to this delay extending Construction and Substantial Completion.
 - Action taken or to be taken to prevent or minimize the delay:
The County immediately coordinated with the Contractor and the Engineer of Record (EOR) to expedite the relocation of the existing duct bank. In addition, the County looked at additional paths to reroute the new duct bank, but due to existing utilities in the vicinity, this was not a feasible option.
 - Schedule for implementation of mitigation strategy:
The strategy to mitigate this delay has already been completed.
2. The Contractor had delays with the electrical gear manufacturer, which delayed the fabrication and delivery of the transformers, motor control centers, and primary and secondary switchgear. In addition, a delay was encountered with the system integration of the controls and control wiring of the individual components of the project, including the electrical gear, compressor control panel, instrumentation, and remote terminal units.

- Anticipated duration of the delay
The additional delay required to deliver the electrical equipment and adequately integrate the individual electrical components resulted in the approximately 335-day extension of Construction and Substantial Completion dates of Consent Decree work.
 - Action taken or to be taken to prevent or minimize the delay
The County coordinated closely with the Contractor and the EOR to review and approve the manufacturer's equipment submittals, including multiple meetings between the EOR and the manufacturers to discuss the review comments and the issues preventing the approval of the gear. In addition, the County utilized existing Contracts with Siemens (control panel supplier), Eaton (electrical gear supplier), and Mohawk (programming team) to issue work directives to assist with the development and coordination of the loop drawings required to integrate the individual systems. WASD's electrical team and the Contractor's electrical subcontractor contributed forces to help identify and complete landing the wiring necessary for the control loops to function.
 - Schedule for implementation of mitigation strategy
The County identified options to reduce the time from 60 to 30 days based on the sequence of construction and startup requirements for the Contract. The reduction has been identified between the startup of Compressor No. 04 and the release of Compressor No. 03 for fabrication.

The Compressor manufacturer, Ingersoll Rand, is reviewing options to reduce the turnaround time from 120 to 90 days for Compressor No. 03, including shipping the components individually when fabrication or rehabilitation is complete, versus shipping the complete system.

The Contractor will be able to decrease installation time from 30 days to 7 by receiving components of Compressor No. 03 earlier. The Contractor will also commit additional time and resources to the installation process.
3. The project experienced delays in the commissioning process of Compressor No. 04, including: the Contractor identifying missing parts; issues with the soft starter provided within the electrical switchgear causing excessive vibration; alignment issues between the compressor and compressor motor; and settings within the vibration switches causing unnecessary shutdowns.
- Anticipated duration of the delay
The additional delays in troubleshooting the issues found during the commissioning process resulted in 23 days additional time.
 - Action taken or to be taken to prevent or minimize the delay
Ingersoll Rand (compressor manufacturer), Eaton (electrical gear supplier), Siemens (control panel supplier), Mohawk (programmer) and Contractor provided resources to troubleshoot and identify the issues preventing startup. Through this combined effort, issues were resolved, and testing could proceed on July 2, 2021. The County currently anticipates completing the testing of Compressor No. 4 by August 2021 and reaching Construction Completion in March 2022 and Substantial Completion in June 2022.
 - Schedule for implementation of mitigation strategy
The strategy to mitigate this delay has been executed.

Cause or contribute to the endangerment of public health, welfare, or the environment

Improvements performed under CD CIP 1.2 are needed to meet SDWWTP's 125-ton oxygen demand, which could affect the performance of the secondary treatment process and result in effluent limit violations. However, there is no indication that delays in startup and commissioning of the compressors would present an immediate endangerment to the public health, welfare, or the environment.

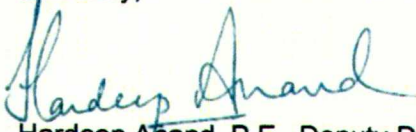
Summary of Project Impacts:

As described herein, there have been delays on this project that have contributed to the potential failure to meet the February 25, 2022 Compliance Date for Project 1.2 Oxygen Production at SDWWTP. Based on the delays and despite the County's best effort to mitigate, the schedule float was lost. The County is currently anticipating that this project will reach Construction Completion with a 30-day delay. The County respectfully requests that the delays listed above be considered justifiable toward the anticipated delay from the Compliance Date. Therefore, no penalties should be assessed. The County believes that due diligence was performed during the design, and the conditions that caused the delays were unforeseen. Additionally, the County took immediate action to mitigate any further delay, as supported above.

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

Should you have any questions regarding this matter, please call me at (786) 552-8571.

Sincerely,

A handwritten signature in blue ink, appearing to read "Hardeep Anand".

Hardeep Anand, P.E., Deputy Director
Capital Improvement & Regulatory Compliance
Miami-Dade Water and Sewer Department

ec: Anita Patel
Senior Assistant Attorney General, Complex Litigation,
Office of the Attorney General
PL 01 The Capitol
Tallahassee, FL 32399-1050
(850) 414-3694
anita.patel@myfloridalegal.com

Elizabeth Teegen
Senior Assistant Attorney General, Complex Litigation
Office of the Attorney General
PL-01, The Capitol
Tallahassee, FL 32399-1050
850-414-3699
Elizabeth.Teegen@myfloridalegal.com

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Lisa.M.Self@dep.state.fl.us
Mike.Bechtold@dep.state.fl.us
Sed.wastewater@dep.state.fl.us
Gisselle.Castillo@dep.state.fl.us

Madam Mayor Daniella Levine-Cava
Miami-Dade County
111 NW First Street 29th Floor
Miami, Florida 33128
Daniella.Cava@miamidade.gov

Jimmy Morales, Office of the Mayor
Miami-Dade County Chief Operations Officer
111 NW 1st Street 29th Floor
Miami, FL 33128
Jimmy.Morales2@miamidade.gov

Angela Benjamin
Miami-Dade Assistant County Attorney
Miami-Dade County Attorney's Office
111 NW First Street Suite 2810
Miami, Florida 33128
Angela.Benjamin@miamidade.gov

Roy Coley, Director
Miami-Dade Water and Sewer Department
3071 SW 38th Avenue
Miami, Florida 33146
Roy.Coley@miamidade.gov

Richard Elliott, P.E., PMP
Environmental Engineer
Water Protection Division
U.S. Environmental Protection Agency - Region 4
61 Forsyth Street, SW
Atlanta, GA 30303
Elliott.Richard@epa.gov

Paul Schwartz
Associate Regional Counsel
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303
Schwartz.Paul@epa.gov

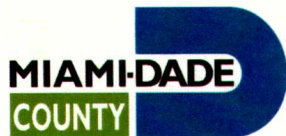
William A. Weinischke
Senior Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044
Bill.Weinischke@usdoj.gov

ebc: Antonio Cotarelo
Raghavender Joshi
Marisela Aranguiz
Frances G. Morris
Sarah Davis
Lashika Nelson
Richard O'Rourke
Annalise Mannix
Robert Fergen
Carlos Castro
Rolando Roque
Dan Edwards
Alejandro Martinez-Esteve
Oscar Vasquez
Mario J. Campa

Lee N. Hefty (RER-DERM)
Carlos Hernandez (RER-DERM)
Rashid Istambouli (RER-DERM)

Martin Dorward (CD PMCM)
Natalia Duque (CD PMCM)
Andrea Suárez Abastida (CD PMCM)

Exhibit C



miamidade.gov

Water and Sewer
PO Box 330316 • 3071 SW 38 Avenue
Miami, Florida 33233-0316
T 305-665-7471

VIA ELECTRONIC CORRESPONDENCE

February 25, 2022

CCN: 64241

File No: 8.DC.20.52

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Tom Mariani
Washington, D.C. 20044-7611
RE: DOJ No. 90-5-1-1-4022/1
Tom.Mariani@usdoj.gov

Chief, Clean Water Enforcement Branch
Water Protection Division
Attn: Brad Ammons
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Ammons.Brad@epa.gov

Rachael Amy Kamons
Environmental Enforcement Section
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611
Rachael.Kamons@usdoj.gov

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Jason.Andreotta@dep.state.fl.us

**RE: Consent Decree (Case: No. 1:12-cv-24400-FAM),
Reference DOJ Case No. 90-5-1-1-4022/1,
Section XI, Paragraph 52 – Potential Delay,
Section XVII, Paragraph 77 – Notices, Failure to Meet Compliance Date Notification
for Consent Decree Appendix D-2, Capital Improvement Projects 1.2 - Oxygen
Production**

Dear Sir/Madam:

In accordance with the provisions of Section XI, Paragraph 52 of the above referenced Consent Decree (CD), on June 30, 2021, Miami-Dade County (County) electronically notified the United States Environmental Protection Agency (EPA) and Florida Department of Environmental Protection (FDEP) of a Potential Delay of Consent Decree (CD) Capital Improvement Project (CIP) 1.2 Oxygen Production at the South District Wastewater Treatment Plant (SDWWTP).

The subject project experienced delays during the construction phase related to the relocation of the existing duct bank due to unforeseen field conditions; and ongoing delays due to the protracted procurement and fabrication schedule of electrical gear and compressor replacement parts caused by disruptions to the manufacturing processes precipitated by the Pandemic. Specifically, in January 2022, the manufacturer/supplier for the replacement parts for Compressor No. 3 informed the County that the lead time for the fabrication and delivery of mechanical

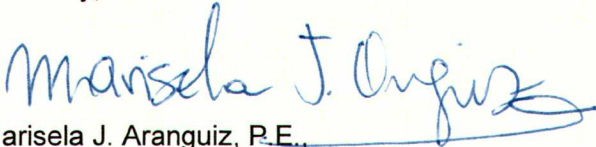
components which include bull gear, vessels, cooling system (bundles and shell) and forced lubrication system was thirty-two (32) weeks, with no opportunity to expedite. As such, it is now projected that the project will be complete by October 31st, 2022. Consequently, the purpose of this letter is to notify EPA and FDEP that the County will miss the CD Compliance Date of February 25, 2022, and advise that the revised estimated date for completing the project is October 31, 2022.

The County remains committed to completing this project and will provide notification once it has been accomplished.

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

Should you have any questions regarding this matter, please call me at (786) 552-8894.

Sincerely,



Marisela J. Aranguiz, P.E.,
Deputy Director
Miami-Dade Water and Sewer Department

ec: Anita Patel
Senior Assistant Attorney General, Complex Litigation,
Office of the Attorney General
PL 01 The Capitol
Tallahassee, FL 32399-1050
(850) 414-3694
anita.patel@myfloridalegal.com

Elizabeth Teegen
Senior Assistant Attorney General, Complex Litigation
Office of the Attorney General
PL-01, The Capitol
Tallahassee, FL 32399-1050
850-414-3699
Elizabeth.Teegen@myfloridalegal.com

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Lisa.M.Self@dep.state.fl.us
Samantha.Cote@FloridaDEP.gov
Sed.wastewater@dep.state.fl.us
Bridjette.Buccell@FloridaDEP.gov

Madame Mayor Daniella Levine-Cava
Miami-Dade County
111 NW First Street 29th Floor
Miami, Florida 33128
Daniella.Cava@miamidade.gov

Jimmy Morales, Office of the Mayor
Miami-Dade County Chief Operations Officer
111 NW 1st Street 29th Floor
Miami, FL 33128
Jimmy.Morales2@miamidade.gov

Angela Benjamin
Miami-Dade Assistant County Attorney
Miami-Dade County Attorney's Office
111 NW First Street Suite 2810
Miami, Florida 33128
Angela.Benjamin@miamidade.gov

Roy Coley, Director
Miami-Dade Water and Sewer Department
3071 SW 38th Avenue
Miami, Florida 33146
Roy.Coley@miamidade.gov

Richard Elliott, P.E., PMP
Environmental Engineer
Water Protection Division
U.S. Environmental Protection Agency - Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303
Elliott.Richard@epa.gov

Paul Schwartz
Associate Regional Counsel
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303
Schwartz.Paul@epa.gov