



February 2, 2015

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Suite 700  
Miami Beach, FL 33139-3164

Eric Glazer  
Janus Hotel Management Services, LLC  
2300 NW Corporate Blvd., Suite 232  
Boca Raton, FL 33431

Subject: Crystal Lake RV Resort (WPDES Permit Number: 0061093)

Dear Mr. Edwards and Glazer:

Based on our phone conversation on January 8, 2015, the Department of Natural Resources ("Department") understands that the legal process allowing LNR Partners, LLC ("LNR") to take ownership of and subsequently sell the Crystal Lake RV Resort has been delayed to a point where the transfer of ownership is likely to occur after April 1, 2015. The Department also understands that LNR is requesting that the Department not terminate the Crystal Lake RV Resort's WPDES permit on April 1, 2015 as was previously communicated by the department in the event that the resort was not sold to an owner willing to upgrade the wastewater treatment facility to meet state standards. LNR anticipates that the foreclosure process and subsequent sale of the property is likely to be completed by the end of July 2015. The Department and LNR/Janus discussed that conditions could be placed on operation of the wastewater facility to better protect human health and the environment until a WPDES permit can be reissued to a new owner with a compliance schedule to upgrade the facility. The department has developed the following conditions:

- Continue weekly reporting of water usage, influent flows, holding tank influent flows, rainfall, freeboard (for each lagoon) and spray irrigation activities. In addition, the fecal coliform analysis shall be included when results become available.
- The department shall be notified within 4 hours of receiving laboratory reports if fecal coliform exceeds 1,000 #/100 ml in the spray irrigated effluent. Additional changes in facility management may be needed to drop elevated fecal coliform levels on a case by case basis.
- Freeboard should be measured daily in all three lagoons.
- The department shall be notified within 4 hours of measurement, if the measured freeboard drops to 24" or less from the top of the lowest elevation of the berm to the top of the wastewater surface for any lagoon.
- A minimum of 18" of freeboard, measured from the lowest elevation of the top of the berm to the top of the wastewater surface, should be maintained in all three lagoons at all times. If less than 18" of freeboard is observed in any lagoon and the conditions of the WPDES permit do not allow spray irrigation at that time, the wastewater shall immediately be pumped and hauled to a wastewater treatment

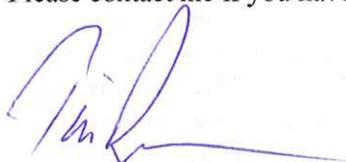
facility for treatment until the minimum 18" of freeboard is achieved in all three lagoons. The department shall be notified prior to pumping and hauling.

- Janus shall submit an updated management plan, as required under Section 4.3.6 of the facilities WPDES permit, to the department by March 15, 2015. At a minimum, the updated management plan shall include but not be limited to:
  - An outline of what procedures will be followed should pumping and hauling be necessary including a listing of companies or individuals identified that will be responsible for pumping/hauling wastewater and treatment facilities that are willing to accept the wastewater.
  - An updated spray irrigation management plan as required under s. NR 110.25(3m) Wis. Adm. Code that reflects current conditions. At a minimum, an aerial photograph outlining the normal track of the traveling gun shall be included. Load/rest cycles should be clarified.
  - A lagoon management plan that will outline how wastewater levels in the lagoons will be managed to maximize retention time to reduce fecal coliform levels.

If the resort is sold to another owner who will continue to operate the wastewater treatment facility, the Department must be notified in writing of the transfer. Pursuant to Wis. Stats. s. 283.53(2d) and chapter NR 205, Wis. Adm. Code, prior to the transfer, the new owner must sign a stipulation of permit acceptance, and inform the Department of any changes in operation of the wastewater treatment system. If new owner of the facility intends to continue operation of the system, a permit application for reissuance must be submitted, and the Department may reissue a WPDES permit to the new owner. Any reissued permit will likely include a compliance schedule for upgrading the wastewater treatment facility. All conditions of the current WPDES permit shall be met until the department takes action on the current permit or a new application.

Based on our January 8, 2015 phone conversation, the Department understands that LNR or Janus will be providing an update to the residents of the resort regarding plans for operation during the 2015 season and any information that can be shared concerning the sale of the resort.

Please contact me if you have any questions.



Tim Ryan, P.E.  
Wastewater Field Supervisor

cc. Steve Ales – SCR Fitchburg  
Robin Nyffeler – LS/8  
Doris Thiele – SCR Horicon