

13 August, 2014

Mr. Jeff Derouen
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Frankfort, KY 40602

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PUBLIC SERVICE
COMMISSION

Mr. Derouen,

Case No. 2014-00290

I am Terry Coker, operator of record for Evergreen Sewage Disposal System in Franklin County, KY. The facility permit number is KY 0078298. I am a contractor and not an employee of Evergreen SDS. I have been requested by Michael Dailey, President of Evergreen SDS to contact you.

This letter is being sent to request the Kentucky Public Service Commission to authorize a deviation from the new requirement that all equipment be inspected on a daily basis. It is my understanding that this deviation can be granted for good cause shown.

The Evergreen SDS plant is permitted for 22,000 gallons per day (gpd). The actual flow average is 7,000 gpd (4.86 gallons per minute) with a highest flow for the month around 10,000 gpd (6.95 gpm). It has 1 pumping station which is located at the plant. This station consists of two 1/2 hp 115 volt submersible pumps. Each pump discharges 70 gallons per minute into the plant. If one pump failed the other pump would more than handle the flow.

The only other mechanical equipment at the plant is the blower assembly for aerating. It consists of a rotary lobe blower, 3 HP 230 volt motor and a 24 hr timer for auto operation. The blower is set to run 30 minutes on and 30 minutes off.

My agreement with Evergreen SDS is to inspect and maintain the wastewater plant and lift station 3 days per week. We usually inspect the plant on Sunday, Tuesday and Thursday but the schedule is flexible and may change from week to week. Additional inspections are performed on an as needed basis such as during heavy rain events and after storms or power outages, etc. I am also there at different times to deliver chemicals and perform composite samples for lab tests.

The mechanical equipment at the plant is always kept in good condition and promptly repaired/replaced. I have been operating this plant since June 2010. During that time we have had seventeen (17) bypasses. Fifteen (15) of those bypasses were turning the blower off to allow the solids to settle in the plant during heavy rain events. One of the bypasses was due to equipment failure. In that instance the motor failed (September 2010) and a new motor was installed the next day. The other equipment related bypass happened on July 27, 2012. During a violent storm a large tree fell across the rear end off the plant on 7/27/2012 causing damage to the electrical panel that controls the blower. The blower motor would not operate because of the electrical cabinet failure. The plant became septic because it was several days until the tree could be removed and then the electrical panel repaired.

Also, since June 2010 there have been only four (4) overflows. The reasons for those overflows are as follow:

1. June 30, 2010: One pump had become clogged and there was no second pump at that time. The second pump was installed in the wet well on 7/1/2010
2. September 6, 2010: After having the old wet well pumped out by a tank truck, later that night some remaining debris clogged the line between the old wet well and new wet well. This caused one manhole to overflow slightly (<50 gallons) before the clog broke free on its own.
3. April 14, 2012: Both floats inside the wet well were wedged in the "off" position causing a manhole to run over. The floats were re-located inside the wet well to prevent this from happening again.
4. July 5, 2013: Manhole ran over during an event of unusually heavy rains. With both pumps pumping (about 140 gallons per minute) the water level inside became so high that one manhole ran over.

The 3 daily inspections per week plus the other (as needed) inspections have effectively worked in maintain this plant. It is very cost effective continue the way we have in the past. Inspecting the plant 7 days per week would increase Evergreen SDS's annual expense by \$ 2400.00. Buying a monitoring system for the pumps and blower would be about \$ 2800.00. And the system monitors the wet well water level and only that the blower motor is running and has no way of monitoring if the v-belt is broken and blower is not running.

Evergreen SDS has only about 30 to 35 customers. With this limited source of income, it is unreasonable to require 7 day inspection of equipment. We are planning on some metal repair of the plant, rust removal and re-coating. If Evergreen SDS is not granted a deviation and the 7 day inspection of equipment is required, then these repairs will be delayed for some years to come due to the lack of financial resources.

Please consider Evergreen SDS's request for a deviation from the 7 day inspection of equipment. Based on the information that I have provided, you will find that the equipment inspection schedule now in place has been adequately effective in the past as well as in the future. Good cause has been shown for this deviation to be granted. If any additional information is needed please contact me.

██████████ or ██████████

Thanking you in advance,



Terry A. Coker, Kentucky Wastewater Operator II

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