



BLUEGRASS WATER

Utility Operating Company

A CSWR Managed Utility

January 29, 2021

Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40601

Re: Six month utility performance of Bluegrass Water UOC (River Bluff, Joanne Estates - Timberland, Center Ridge Water)

Dear PSC staff,

In the six months following the completion of the closing on the River Bluff, Joanne Estates, and Center Ridge systems, Bluegrass Water implemented a utility asset management program, put in place qualified certified operations personnel, launched a multi-platform billing and customer service program, and in general made an effort to increase water and sewerage service reliability and customer service provided to each service area now served by our company.

Bluegrass Water has entered into the previously discussed Agreed Orders with the Kentucky Department of Water (DOW) for the two sewer plants that each have significant investment needs with a schedule of compliance that Bluegrass Water will work under in order to bring each system into compliance system reliability and safety. Bluegrass Water has made numerous repairs and replacements of failed equipment at several of the Center Ridge water districts and at the sewer systems' WWTPs to increase plant performance. Please see our 6 month improvement attachment for a summarized update. Effluent testing results for the operations are also attached.

Since the 1st-month performance reports filed for these three acquisitions, Bluegrass Water had 0 service interruptions and received two customer complaints regarding customer service:

- Center Ridge – A customer alerted the Company of a leak in the road which the Company quickly repaired.
- River Bluffs – A customer alerted the Company about a lift station leaking into their yard. The Company promptly fixed the issue.

Bluegrass Water's customer service group received 120 calls in the month of November 2020 (the 6th full month of its operation of all three systems) for all the systems served by Bluegrass Water. The average wait time for a caller was 1 minute and 35 seconds and the average time to handle a call was 4 minutes and 52 seconds. Only 8 of the 120 calls abandoned their call during the wait period.

Bluegrass Water is pleased to provide its customers with excellent customer service and Bluegrass Water is working to improve system operations over the coming months via on-going investments and professionalized operations with a plan to bring all the systems into full compliance with DOW. Please do not hesitate to contact Bluegrass Water with any questions regarding this report.

Sincerely,
/s/ Mike Duncan
Mike Duncan
Vice President

Attachments: -00360 Performance Testing Results, -00360 Redacted Work Orders,
-00360 System Improvements, River Bluffs AO, Timberland AO

BG - Center Ridge Water District #1 - KY0180549

Testing Documentation

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Bac-t test								
Average Daily Flow								
Total Monthly Flow								
Bac-t test	1/1/2020	1/31/2020	1/22/2020		Absent	Detection for Bacteria	Yes	RT 6 BOX 242
Bac-t test	2/1/2020	2/29/2020	2/19/2020		Absent	Detection for Bacteria	Yes	RT 6
Bac-t test	3/1/2020	3/31/2020	3/25/2020		Absent	Detection for Bacteria	Yes	RT 6 BOX 265
Bac-t test	4/1/2020	4/30/2020	4/29/2020		Absent	Detection for Bacteria	Yes	RT 6 BOX 261
Bac-t test	5/1/2020	5/31/2020	5/20/2020		Absent	Detection for Bacteria	Yes	RT 6 BOX 266A Purchased 05/29/20
Bac-t test	6/1/2020	6/30/2020	6/30/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	7/1/2020	7/31/2020	7/15/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	8/1/2020	8/31/2020	8/12/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	9/1/2020	9/30/2020	9/9/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	10/1/2020	10/31/2020	10/7/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	11/1/2020	11/30/2020	11/4/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	12/1/2020	12/31/2020	12/2/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	1/1/2021	1/31/2021				Detection for Bacteria		
Bac-t test	2/1/2021	2/28/2021				Detection for Bacteria		
Bac-t test	3/1/2021	3/31/2021				Detection for Bacteria		
Bac-t test	4/1/2021	4/30/2021				Detection for Bacteria		
Bac-t test	5/1/2021	5/31/2021				Detection for Bacteria		
Bac-t test	6/1/2021	6/30/2021				Detection for Bacteria		
Bac-t test	7/1/2021	7/31/2021				Detection for Bacteria		
Bac-t test	8/1/2021	8/31/2021				Detection for Bacteria		
Bac-t test	9/1/2021	9/30/2021				Detection for Bacteria		
Bac-t test	10/1/2021	10/31/2021				Detection for Bacteria		
Bac-t test	11/1/2021	11/30/2021				Detection for Bacteria		
Bac-t test	12/1/2021	12/31/2021				Detection for Bacteria		

BG - Center Ridge Water District #2 - KY0180509

Testing Documentation

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Bac-t test								
Average Daily Flow								
Total Monthly Flow								
Bac-t test	1/1/2020	1/31/2020	1/22/2020		Absent	Detection for Bacteria	Yes	283 LAKEPOINT LN.
Bac-t test	2/1/2020	2/29/2020	2/19/2020		Absent	Detection for Bacteria	Yes	81 LAKESHORE DR
Bac-t test	3/1/2020	3/31/2020	3/25/2020		Absent	Detection for Bacteria	Yes	38 FAWNWOOD DR
Bac-t test	4/1/2020	4/30/2020	4/29/2020		Absent	Detection for Bacteria	Yes	216 LAKEPOINT LN.
Bac-t test	5/1/2020	5/31/2020	5/20/2020		Absent	Detection for Bacteria	Yes	6632 DUNBAR RD. Purchased 05/29/20
Bac-t test	6/1/2020	6/30/2020	6/26/2020		Absent	Detection for Bacteria	Yes	Sampled for boil order
Bac-t test	6/1/2020	6/30/2020	6/30/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	7/1/2020	7/31/2020	7/15/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	8/1/2020	8/31/2020	8/12/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	8/1/2020	8/31/2020	8/28/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	8/1/2020	8/31/2020	8/29/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	9/1/2020	9/30/2020	9/9/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	10/1/2020	10/31/2020	10/7/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	11/1/2020	11/30/2020	11/4/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	12/1/2020	12/31/2020	12/2/2020		Absent	Detection for Bacteria	Yes	

BG - Center Ridge Water District #3 - KY0180502

Testing Documentation

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Bac-t test								
Average Daily Flow								
Total Monthly Flow								
Bac-t test	1/1/2020	1/31/2020	1/22/2020		Absent	Detection for Bacteria	Yes	HCR 118
Bac-t test	2/1/2020	2/29/2020	2/19/2020		Absent	Detection for Bacteria	Yes	GEN DEL (21 LAKESHORE)
Bac-t test	3/1/2020	3/31/2020	3/25/2020		Absent	Detection for Bacteria	Yes	HCR 117 (23 LAKESHORE)
Bac-t test	4/1/2020	4/30/2020	4/29/2020		Absent	Detection for Bacteria	Yes	13 KENIANA DR
Bac-t test	5/1/2020	5/31/2020	5/20/2020		Absent	Detection for Bacteria	Yes	HCR 119 (20 KENIANA DR) Purchased 05/29/20
Bac-t test	6/1/2020	6/30/2020	6/30/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	7/1/2020	7/31/2020	7/27/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	7/1/2020	7/31/2020	7/27/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	8/1/2020	8/31/2020	8/12/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	8/1/2020	8/31/2020	8/28/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	9/1/2020	9/30/2020	9/9/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	10/1/2020	10/31/2020	10/7/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	11/1/2020	11/30/2020	11/4/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	12/1/2020	12/31/2020	12/2/2020		Present	Detection for Bacteria	No	
Bac-t test	12/1/2020	12/31/2020	12/3/2020		Absent	Detection for Bacteria	Yes	Resample for above
Bac-t test	12/1/2020	12/31/2020	12/3/2020		Absent	Detection for Bacteria	Yes	Resample for above
Bac-t test	12/1/2020	12/31/2020	12/3/2020		Absent	Detection for Bacteria	Yes	Resample for above
Bac-t test	12/1/2020	12/31/2020	12/3/2020		Absent	Detection for Bacteria	Yes	Resample for above

BG - Center Ridge Water District #4 - KY0183106

Testing Documentation

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Bac-t test								
Average Daily Flow								
Total Monthly Flow								
Bac-t test	1/1/2020	1/31/2020	1/22/2020		Absent	Detection for Bacteria	Yes	327 WINDSONG CIR
Bac-t test	2/1/2020	2/29/2020	2/19/2020		Absent	Detection for Bacteria	Yes	211 WOODDED ACRES LN
Bac-t test	3/1/2020	3/31/2020	3/25/2020		Absent	Detection for Bacteria	Yes	363 WOODSONG CIR
Bac-t test	4/1/2020	4/30/2020	4/29/2020		Absent	Detection for Bacteria	Yes	26 HOLLY HOCK DR
Bac-t test	5/1/2020	5/31/2020	5/20/2020		Absent	Detection for Bacteria	Yes	409 WINDSONG CIR Purchased 05/29/20
Bac-t test	6/1/2020	6/30/2020	6/30/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	7/1/2020	7/31/2020	7/15/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	8/1/2020	8/31/2020	8/12/2020		Absent	Detection for Bacteria	Yes	
Bac-t test	9/1/2020	9/30/2020	9/1/2020		Absent	Detection for Bacteria	Yes	26 Holly Hock *Boil Order
Bac-t test	9/1/2020	9/30/2020	9/1/2020		Absent	Detection for Bacteria	Yes	363 Windsong Circle *Boil Order
Bac-t test	9/1/2020	9/30/2020	9/1/2020		Absent	Detection for Bacteria	Yes	232 Windsong Circle *Boil Order
Bac-t test	9/1/2020	9/30/2020	9/9/2020		Absent	Detection for Bacteria	Yes	363 Windsong Circle
Bac-t test	10/1/2020	10/31/2020	10/7/2020		Absent	Detection for Bacteria	Yes	363 Windsong Circle
Bac-t test	11/1/2020	11/30/2020	11/4/2020		Absent	Detection for Bacteria	Yes	363 Windsong Circle
Bac-t test	12/1/2020	12/31/2020	12/2/2020		Absent	Detection for Bacteria	Yes	327 Windsong Circle

Timberland - NPDES KY0183106

Testing Documentation

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Flow	5/1/2020	5/31/2020	5/29/2020	6/9/2020	0.03	Report (gpd)	Yes	
pH	5/1/2020	5/31/2020	5/29/2020	6/9/2020	6.96	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		3.1 lbs/Day		
CBOD5 (Monthly Average)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		2.1 lbs/day		
CBOD5 (Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	11.00	15mg/L	Yes	
CBOD5 (Monthly Average)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	11.00	10 mg/L	No	Under AO
TSS (Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		9.4 lbs/Day		
TSS (Monthly Average)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		6.3 lbs/day		
TSS (Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	21.00	45 mg/L	Yes	
TSS (Monthly Average)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	21.00	30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		0.6 lbs/Day		
Ammonia (May 1 - Oct 31 Monthly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		0.4 lbs/day		
Ammonia (May 1 - Oct 31 Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	16.00	3 mg/L	No	Under AO
Ammonia (May 1 - Oct 31 Monthly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	16.00	2 mg/L	No	Under AO
Ammonia (Nov 1 - Apr 30 Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		2.8 lbs/Day		
Ammonia (Nov 1 - Apr 30 Monthly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		1.9 lbs/day		
Ammonia (Nov 1 - Apr 30 Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		13.5 mg/L		
Ammonia (Nov 1 - Apr 30 Monthly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		9 mg/L		
E Coli. (colonies/100mL) (Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	>2,419.6	240 #/100 mL	No	Under AO
E Coli. (colonies/100mL) (Monthly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020		130		
DO (Min)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	6.02	7.0 mg/L	Yes	
TRC (Weekly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	0.05	0.019 mg/L	No	Under AO
TRC (Monthly Avg)	5/1/2020	5/31/2020	5/29/2020	6/9/2020	0.05	0.011 mg/L	No	Under AO
Flow	6/1/2020	6/30/2020	6/24/2020	7/1/2020	0.03	Report (gpd)		
pH	6/1/2020	6/30/2020	6/24/2020	7/1/2020	7.10	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	7.40	<15mg/L	Yes	
CBOD5 (Monthly Average)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	7.40	<10 mg/L	Yes	
TSS (Weekly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	15.00	<45 mg/L	Yes	
TSS (Monthly Average)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	15.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	16.00	<3 mg/L	No	Lagoon aeration is inop. Repairing the blower that runs logoon aeration and contact chamber will be rebuilt. Under AO
Ammonia (May 1 - Oct 31 Monthly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	16.00	<2 mg/L	No	Lagoon aeration is inop. Repairing the blower that runs logoon aeration and contact chamber will be rebuilt. Under AO
Ammonia (Nov 1 - Apr 30 Weekly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	N/A	13.5 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	N/A	9 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	>2419.6	<240 #/100 mL	No	Lagoon aeration is inop. Repairing the blower that runs logoon aeration and contact chamber will be rebuilt. Under AO
E Coli. (colonies/100mL) (Monthly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	>2419.6	<130 #/100mL	No	Lagoon aeration is inop. Repairing the blower that runs logoon aeration and contact chamber will be rebuilt. Under AO
DO (Min)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	6.80	>7.0 mg/L	Yes	
TRC (Weekly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	0.03	0.019 mg/L	No	Lagoon aeration is inop. Repairing the blower that runs logoon aeration and contact chamber will be rebuilt. Under AO
TRC (Monthly Avg)	6/1/2020	6/30/2020	6/24/2020	7/1/2020	0.03	0.011 mg/L	No	Lagoon aeration is inop. Repairing the blower that runs logoon aeration and contact chamber will be rebuilt. Under AO
Flow	7/1/2020	7/31/2020	7/28/2020	8/4/2020	0.03	Report (gpd)		
pH	7/1/2020	7/31/2020	7/28/2020	8/4/2020	7.79	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	7.60	<15mg/L	Yes	
CBOD5 (Monthly Average)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	7.60	<10 mg/L	Yes	
TSS (Weekly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	18.00	<45 mg/L	Yes	
TSS (Monthly Average)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	18.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	18.00	<3 mg/L	No	
Ammonia (May 1 - Oct 31 Monthly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	18.00	<2 mg/L	No	
Ammonia (Nov 1 - Apr 30 Weekly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	N/A	13.5 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	N/A	9 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	2.00	<240 #/100 mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	2.00	<130 #/100mL	Yes	
DO (Min)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	6.30	>7.0 mg/L	No	The 2nd blower was recently put back online to bring DO up.
TRC (Weekly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	2.20	0.019 mg/L	No	Will adjust chemical feeds.
TRC (Monthly Avg)	7/1/2020	7/31/2020	7/28/2020	8/4/2020	2.20	0.011 mg/L	No	Will adjust chemical feeds.
Flow	8/1/2020	8/31/2020	8/5/2020	8/17/2020	0.03	Report (gpd)		
pH	8/1/2020	8/31/2020	8/5/2020	8/17/2020	7.73	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	7.30	<15mg/L	Yes	
CBOD5 (Monthly Average)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	7.30	<10 mg/L	Yes	
TSS (Weekly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	18.00	<45 mg/L	Yes	
TSS (Monthly Average)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	18.00	<30 mg/L	Yes	

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Ammonia (May 1 - Oct 31 Weekly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	16.00	<3 mg/L	No	Had to much CL2 and not enough dechlorination. Will add more dechlorination next time. Just replaced blower motor but may time sometime to help plant and lagoon. Lagoon really needs a separate blower. Operator thinks that's in the works.
Ammonia (May 1 - Oct 31 Monthly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	16.00	<2 mg/L	No	Had to much CL2 and not enough dechlorination. Will add more dechlorination next time. Just replaced blower motor but may time sometime to help plant and lagoon. Lagoon really needs a separate blower. Operator thinks that's in the works.
Ammonia (Nov 1 - Apr 30 Weekly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	N/A	13.5 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	N/A	9 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	7.50	<240 #/100 mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	7.50	<130 #/100mL	Yes	
DO (Min)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	8.00	>7.0 mg/L	Yes	
TRC (Weekly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	0.05	<0.019 mg/L	No	Had to much CL2 and not enough dechlorination. Will add more dechlorination next time. Just replaced blower motor but may time sometime to help plant and lagoon. Lagoon really needs a separate blower. Operator thinks that's in the works.
TRC (Monthly Avg)	8/1/2020	8/31/2020	8/5/2020	8/17/2020	0.05	<0.011 mg/L	No	Had to much CL2 and not enough dechlorination. Will add more dechlorination next time. Just replaced blower motor but may time sometime to help plant and lagoon. Lagoon really needs a separate blower. Operator thinks that's in the works.
Flow	9/1/2020	9/30/2020	9/10/2020	9/25/2020	0.03	Report (gpd)		
pH	9/1/2020	9/30/2020	9/10/2020	9/25/2020	7.33	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	9.20	<15mg/L	Yes	
CBOD5 (Monthly Average)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	9.20	<10 mg/L	Yes	
TSS (Weekly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	36.00	<45 mg/L	Yes	
TSS (Monthly Average)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	36.00	<30 mg/L	No	Per the operator: We need more air in the lagoon, plant to help remove ammonia nd to help with DO levels. This is a capital project to add new blowers and separate blower for the lagoon. We will need to add CL2 to contact chamber for E.coli.
Ammonia (May 1 - Oct 31 Weekly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	8.80	<3 mg/L	No	Per the operator: We need more air in the lagoon, plant to help remove ammonia nd to help with DO levels. This is a capital project to add new blowers and separate blower for the lagoon. We will need to add CL2 to contact chamber for E.coli.
Ammonia (May 1 - Oct 31 Monthly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	8.80	<2 mg/L	No	Per the operator: We need more air in the lagoon, plant to help remove ammonia nd to help with DO levels. This is a capital project to add new blowers and separate blower for the lagoon. We will need to add CL2 to contact chamber for E.coli.
Ammonia (Nov 1 - Apr 30 Weekly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	N/A	13.5 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	N/A	9 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	2419.60	<240 #/100 mL	No	Per the operator: We need more air in the lagoon, plant to help remove ammonia nd to help with DO levels. This is a capital project to add new blowers and separate blower for the lagoon. We will need to add CL2 to contact chamber for E.coli.
E Coli. (colonies/100mL) (Monthly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	2419.60	<130 #/100mL	No	Per the operator: We need more air in the lagoon, plant to help remove ammonia nd to help with DO levels. This is a capital project to add new blowers and separate blower for the lagoon. We will need to add CL2 to contact chamber for E.coli.
DO (Min)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	6.26	>7.0 mg/L	No	Per the operator: We need more air in the lagoon, plant to help remove ammonia nd to help with DO levels. This is a capital project to add new blowers and separate blower for the lagoon. We will need to add CL2 to contact chamber for E.coli.

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
TRC (Weekly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	<0.02	<0.019 mg/L	No	Per the operator: We need more air in the lagoon, plant to help remove ammonia and to help with DO levels. This is a capital project to add new blowers and separate blower for the lagoon. We will need to add CL2 to contact chamber for E.coli.
TRC (Monthly Avg)	9/1/2020	9/30/2020	9/10/2020	9/25/2020	<0.02	<0.011 mg/L	No	Per the operator: We need more air in the lagoon, plant to help remove ammonia and to help with DO levels. This is a capital project to add new blowers and separate blower for the lagoon. We will need to add CL2 to contact chamber for E.coli.
Flow	10/1/2020	10/31/2020	10/29/2020	11/13/2020	0.03	Report (gpd)		
pH	10/1/2020	10/31/2020	10/29/2020	11/13/2020	6.98	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	<5.0	<15mg/L	Yes	
CBOD5 (Monthly Average)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	<5.0	<10 mg/L	Yes	
TSS (Weekly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	16.00	<45 mg/L	Yes	
TSS (Monthly Average)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	16.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	4.90	<3 mg/L	No	Need more air for treatment plant and lagoon to help remove ammonia. Will add more CL2 to kill E.coli and bisulfate to reduce residual chlorine.
Ammonia (May 1 - Oct 31 Monthly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	4.90	<2 mg/L	No	Need more air for treatment plant and lagoon to help remove ammonia. Will add more CL2 to kill E.coli and bisulfate to reduce residual chlorine.
Ammonia (Nov 1 - Apr 30 Weekly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	N/A	13.5 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	N/A	9 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	>2419.6	<240 #/100 mL	No	Need more air for treatment plant and lagoon to help remove ammonia. Will add more CL2 to kill E.coli and bisulfate to reduce residual chlorine.
E Coli. (colonies/100mL) (Monthly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	>2419.6	<130 #/100mL	No	Need more air for treatment plant and lagoon to help remove ammonia. Will add more CL2 to kill E.coli and bisulfate to reduce residual chlorine.
DO (Min)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	7.41	>7.0 mg/L	Yes	
TRC (Weekly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	0.06	<0.019 mg/L	No	Need more air for treatment plant and lagoon to help remove ammonia. Will add more CL2 to kill E.coli and bisulfate to reduce residual chlorine.
TRC (Monthly Avg)	10/1/2020	10/31/2020	10/29/2020	11/13/2020	0.06	<0.011 mg/L	No	Need more air for treatment plant and lagoon to help remove ammonia. Will add more CL2 to kill E.coli and bisulfate to reduce residual chlorine.
Flow	11/1/2020	11/30/2020	11/12/2020	11/30/2020	0.00	Report (gpd)		
pH	11/1/2020	11/30/2020	11/12/2020	11/30/2020	7.11	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	9.50	<15mg/L	Yes	
CBOD5 (Monthly Average)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	9.50	<10 mg/L	Yes	
TSS (Weekly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	6.00	<45 mg/L	Yes	
TSS (Monthly Average)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	6.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	N/A	<3 mg/L	N/A	
Ammonia (May 1 - Oct 31 Monthly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	N/A	<2 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Weekly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	4.10	<13.5 mg/L	Yes	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	4.10	<9 mg/L	Yes	
E Coli. (colonies/100mL) (Weekly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	69.80	<240 #/100 mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	69.80	<130 #/100mL	Yes	
DO (Min)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	8.71	>7.0 mg/L	Yes	
TRC (Weekly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	1.42	<0.019 mg/L	No	The chlorine contact & bisulfate contact tank too small and is not allowing sufficient contact time.
TRC (Monthly Avg)	11/1/2020	11/30/2020	11/12/2020	11/30/2020	1.42	<0.011 mg/L	No	The chlorine contact & bisulfate contact tank too small and is not allowing sufficient contact time.
Flow	12/1/2020	12/31/2020	12/8/2020	12/16/2020		Report (gpd)		
pH	12/1/2020	12/31/2020	12/8/2020	12/16/2020	6.89	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	<5.0	<15mg/L	Yes	
CBOD5 (Monthly Average)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	<5.0	<10 mg/L	Yes	
TSS (Weekly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	<10	<45 mg/L	Yes	
TSS (Monthly Average)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	<10	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	N/A	<3 mg/L	N/A	
Ammonia (May 1 - Oct 31 Monthly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	N/A	<2 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Weekly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	4.50	<13.5 mg/L	Yes	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	4.50	<9 mg/L	Yes	
E Coli. (colonies/100mL) (Weekly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	1.00	<240 #/100 mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	1.00	<130 #/100mL	Yes	
DO (Min)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	6.10	>7.0 mg/L	No	
TRC (Weekly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	2.06	<0.019 mg/L	No	
TRC (Monthly Avg)	12/1/2020	12/31/2020	12/8/2020	12/16/2020	2.06	<0.011 mg/L	No	

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Testing Documentation

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Flow	5/1/2020	5/31/2020	5/21/2020	5/29/2020	0.08	Report		
pH	5/1/2020	5/31/2020	5/21/2020	5/29/2020	7.68	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	24.8 lbs/Day	N/A	
CBOD5 (Monthly Average)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	16.5 lbs/day	N/A	
CBOD5 (Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	7.00	<45 mg/L	Yes	
CBOD5 (Monthly Average)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	7.00	<30 mg/L	Yes	
TSS (Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	24.8 lbs/Day	N/A	
TSS (Monthly Average)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	16.5 lbs/day	N/A	
TSS (Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	22.00	<45 mg/L	Yes	
TSS (Monthly Average)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	22.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	3.30 lbs/Day	N/A	
Ammonia (May 1 - Oct 31 Monthly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	2.20 lbs/day	N/A	
Ammonia (May 1 - Oct 31 Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	4.10	<6 mg/L	Yes	
Ammonia (May 1 - Oct 31 Monthly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	4.10	<4 mg/L	No	Under AO, no NOV
Ammonia (Nov 1 - Apr 30 Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	8.26 lbs/Day	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	5.5 lbs/day	N/A	
Ammonia (Nov 1 - Apr 30 Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	15 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	N/A	10 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	98.00	<240 #/100mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	98.00	<130 #/100mL	Yes	
DO (Min)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	8.04	>7.0 mg/L	Yes	
TRC (Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	<0.01	<0.019 mg/L	Yes	
TRC (Monthly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	<0.01	<0.011 mg/L	Yes	
Total Phosphorus (Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	0.96	2.0 mb/L		
Total Phosphorus (Monthly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	0.96	1.0 mg/L		
Total Nitrogen (Weekly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	5.90	Report		
Total Nitrogen (Monthly Avg)	5/1/2020	5/31/2020	5/21/2020	5/29/2020	5.90	Report		
Flow	6/1/2020	6/30/2020	6/9/2020	6/18/2020	0.06	Report		
pH	6/1/2020	6/30/2020	6/9/2020	6/18/2020	7.55	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	7.00	<45 mg/L	Yes	
CBOD5 (Monthly Average)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	7.00	<30 mg/L	Yes	
TSS (Weekly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	17.00	<45 mg/L	Yes	
TSS (Monthly Average)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	17.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	7.50	<6 mg/L	No	Under AO, no NOV
Ammonia (May 1 - Oct 31 Monthly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	7.50	<4 mg/L	No	Under AO, no NOV
Ammonia (Nov 1 - Apr 30 Weekly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	N/A	15 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	N/A	10 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	12.00	<240 #/100mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	12.00	<130 #/100mL	Yes	
DO (Min)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	7.14	>7.0 mg/L	Yes	
TRC (Weekly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	<0.01	<0.019 mg/L	Yes	
TRC (Monthly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	<0.01	<0.011 mg/L	Yes	
Total Phosphorus (Weekly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	1.69	2.0 mb/L		
Total Phosphorus (Monthly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	1.69	1.0 mg/L		
Total Nitrogen (Weekly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	8.40	Report		
Total Nitrogen (Monthly Avg)	6/1/2020	6/30/2020	6/9/2020	6/18/2020	8.40	Report		
Flow	7/1/2020	7/31/2020	7/7/2020	7/16/2020	0.02	Report		
pH	7/1/2020	7/31/2020	7/7/2020	7/16/2020	7.19	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	10.00	<45 mg/L	Yes	
CBOD5 (Monthly Average)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	10.00	<30 mg/L	Yes	
TSS (Weekly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	13.00	<45 mg/L	Yes	
TSS (Monthly Average)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	13.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	4.90	<6 mg/L	Yes	
Ammonia (May 1 - Oct 31 Monthly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	4.90	<4 mg/L	No	Due to low DO. Started adding nitrifying bacteria in June and closed off the airlines with the worst leakage and wrapped some of the smaller holes in the pipes. Been checking weekly and results have consistently been below 5 so the lab is going to resample in hopes of getting the monthly average lower.
Ammonia (May 1 - Oct 31 Monthly Avg)	7/1/2020	7/31/2020	7/21/2020	7/27/2020	2.80	<4 mg/L	Yes	Resample for above
Ammonia (Nov 1 - Apr 30 Weekly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	N/A	15 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	N/A	10 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	57.00	<240 #/100mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	57.00	<130 #/100mL	Yes	
DO (Min)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	7.27	>7.0 mg/L	Yes	
TRC (Weekly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	<0.01	<0.019 mg/L	Yes	
TRC (Monthly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	<0.01	<0.011 mg/L	Yes	
Total Phosphorus (Weekly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	0.70	2.0 mb/L		**Permit has this as Report Only**le
Total Phosphorus (Monthly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	0.70	1.0 mg/L		**Permit has this as Report Only**le
Total Nitrogen (Weekly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	7.90	Report		
Total Nitrogen (Monthly Avg)	7/1/2020	7/31/2020	7/7/2020	7/16/2020	7.90	Report		
Flow	8/1/2020	8/31/2020	8/7/2020	8/14/2020	0.80	Report		
pH	8/1/2020	8/31/2020	8/7/2020	8/14/2020	7.72	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	6.00	<45 mg/L	Yes	
CBOD5 (Monthly Average)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	6.00	<30 mg/L	Yes	
TSS (Weekly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	10.00	<45 mg/L	Yes	
TSS (Monthly Average)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	10.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	1.70	<6 mg/L	Yes	
Ammonia (May 1 - Oct 31 Monthly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	1.70	<4 mg/L	Yes	

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Ammonia (Nov 1 - Apr 30 Weekly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	N/A	15 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	N/A	10 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	11.00	<240 #/100mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	11.00	<130 #/100mL	Yes	
DO (Min)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	7.85	>7.0 mg/L	Yes	
TRC (Weekly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	<0.01	<0.019 mg/L	Yes	
TRC (Monthly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	<0.01	<0.011 mg/L	Yes	
Total Phosphorus (Weekly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	0.39	2.0 mb/L		**Permit has this as Report Only**-Ie
Total Phosphorus (Monthly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	0.39	1.0 mg/L		**Permit has this as Report Only**-Ie
Total Nitrogen (Weekly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	3.80	Report		
Total Nitrogen (Monthly Avg)	8/1/2020	8/31/2020	8/7/2020	8/14/2020	3.80	Report		
Flow	9/1/2020	9/30/2020	9/18/2020	9/25/2020	1.76	Report		
pH	9/1/2020	9/30/2020	9/18/2020	9/25/2020	7.36	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	20.00	<45 mg/L	Yes	
CBOD5 (Monthly Average)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	20.00	<30 mg/L	Yes	
TSS (Weekly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	<6	<45 mg/L	Yes	
TSS (Monthly Average)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	<6	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	23.60	<6 mg/L	No	Operator believes these problems are due to hydraulic issues due to inadequate blower performance. Repair and updates to the facility are underway. Operator plans to more closely with more frequent monitoring of the ammonia and add sampling locations, IE: aeration and clarifier as well as the effluent.
Ammonia (May 1 - Oct 31 Monthly Avg)	9/1/2020	9/30/2020	9/25/2020	10/7/2020	21.80	<6 mg/L	No	Resample for above
Ammonia (May 1 - Oct 31 Monthly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	23.60	<4 mg/L	No	Operator believes these problems are due to hydraulic issues due to inadequate blower performance. Repair and updates to the facility are underway. Operator plans to more closely with more frequent monitoring of the ammonia and add sampling locations, IE: aeration and clarifier as well as the effluent.
Ammonia (May 1 - Oct 31 Monthly Avg)	9/1/2020	9/30/2020	9/25/2020	10/7/2020	21.80	<4 mg/L	No	Resample for above
Ammonia (Nov 1 - Apr 30 Weekly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	N/A	15 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	N/A	10 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	60000.00	<240 #/100mL	No	Operator believes these problems are due to hydraulic issues due to inadequate blower performance. Repair and updates to the facility are underway. Operator plans to more closely with more frequent monitoring of the ammonia and add sampling locations, IE: aeration and clarifier as well as the effluent.
E Coli. (colonies/100mL) (Weekly Avg)	9/1/2020	9/30/2020	9/24/2020	10/7/2020	68.00	<240 #/100mL	Yes	Resample for above
E Coli. (colonies/100mL) (Weekly Avg)	9/1/2020	9/30/2020	9/24/2020	10/7/2020	64.00	<240 #/100mL	Yes	Resample for above
E Coli. (colonies/100mL) (Weekly Avg)	9/1/2020	9/30/2020	9/25/2020	10/7/2020	32.00	<240 #/100mL	Yes	Resample for above
E Coli. (colonies/100mL) (Monthly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	60000.00	<130 #/100mL	No	Operator believes these problems are due to hydraulic issues due to inadequate blower performance. Repair and updates to the facility are underway. Operator plans to more closely with more frequent monitoring of the ammonia and add sampling locations, IE: aeration and clarifier as well as the effluent.
E Coli. (colonies/100mL) (Monthly Avg)	9/1/2020	9/30/2020	9/24/2020	10/7/2020	64.00	<130 #/100mL	Yes	Resample for above
E Coli. (colonies/100mL) (Monthly Avg)	9/1/2020	9/30/2020	9/24/2020	10/7/2020	68.00	<130 #/100mL	Yes	Resample for above
E Coli. (colonies/100mL) (Monthly Avg)	9/1/2020	9/30/2020	9/25/2020	10/7/2020	45.00	<240 #/100mL	Yes	Resample for above
DO (Min)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	7.19	>7.0 mg/L	Yes	
TRC (Weekly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	<0.01	<0.019 mg/L	Yes	
TRC (Monthly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	<0.01	<0.011 mg/L	Yes	
Total Phosphorus (Weekly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	0.19	2.0 mb/L		**Permit has this as Report Only**-Ie
Total Phosphorus (Monthly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	0.19	1.0 mg/L		**Permit has this as Report Only**-Ie
Total Nitrogen (Weekly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	24.50	Report		
Total Nitrogen (Monthly Avg)	9/1/2020	9/30/2020	9/18/2020	9/25/2020	24.50	Report		
Flow	10/1/2020	10/31/2020	10/2/2020	10/20/2020	0.08	Report		
pH	10/1/2020	10/31/2020	10/2/2020	10/20/2020	7.50	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	5.00	<45 mg/L	Yes	
CBOD5 (Monthly Average)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	5.00	<30 mg/L	Yes	
TSS (Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	<6	<45 mg/L	Yes	
TSS (Monthly Average)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	<6	<30 mg/L	Yes	

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Ammonia (May 1 - Oct 31 Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	8.00	6 mg/L	No	River Bluffs is undergoing a lot of repairs. The operator has been adding nitrifying bacteria at a low dose to help control the ammonia and improve the effluent quality. Unfortunately, the bacteria that was being used, has a short shelf like and expired. After several attempts to reorder the product with no response from the seller, the operator found another supplier and anticipates having it under control this week. Long term goal is, that after improvements are completed, the nitrification process will improve as well.
Ammonia (May 1 - Oct 31 Monthly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	8.00	4 mg/L	No	River Bluffs is undergoing a lot of repairs. The operator has been adding nitrifying bacteria at a low dose to help control the ammonia and improve the effluent quality. Unfortunately, the bacteria that was being used, has a short shelf like and expired. After several attempts to reorder the product with no response from the seller, the operator found another supplier and anticipates having it under control this week. Long term goal is, that after improvements are completed, the nitrification process will improve as well.
Ammonia (Nov 1 - Apr 30 Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	N/A	15 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	N/A	10 mg/L	N/A	
E Coli. (colonies/100mL) (Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	11.00	<240 #/100mL	Yes	
E Coli. (colonies/100mL) (Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	11.00	<240 #/100mL	Yes	
DO (Min)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	7.27	>7.0 mg/L	Yes	
TRC (Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	0.01	<0.019 mg/L	Yes	
TRC (Monthly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	0.01	<0.011 mg/L	Yes	
Total Phosphorus (Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	1.41	2.0 mb/L	Yes	
Total Phosphorus (Monthly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	1.41	1.0 mg/L	No	River Bluffs is undergoing a lot of repairs. The operator has been adding nitrifying bacteria at a low dose to help control the ammonia and improve the effluent quality. Unfortunately, the bacteria that was being used, has a short shelf like and expired. After several attempts to reorder the product with no response from the seller, the operator found another supplier and anticipates having it under control this week. Long term goal is, that after improvements are completed, the nitrification process will improve as well.
Total Nitrogen (Weekly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	10.30	Report		
Total Nitrogen (Monthly Avg)	10/1/2020	10/31/2020	10/2/2020	10/20/2020	10.30	Report		
Flow	11/1/2020	11/30/2020	11/13/2020	11/20/2020		Report		
pH	11/1/2020	11/30/2020	11/13/2020	11/20/2020	7.66	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	6.00	<45 mg/L	Yes	
CBOD5 (Monthly Average)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	6.00	<30 mg/L	Yes	
TSS (Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	<6	<45 mg/L	Yes	
TSS (Monthly Average)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	<6	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	N/A	<6 mg/L	N/A	
Ammonia (May 1 - Oct 31 Monthly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	N/A	<4 mg/L	N/A	
Ammonia (Nov 1 - Apr 30 Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	1.50	15 mg/L	Yes	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	1.50	10 mg/L	Yes	
E Coli. (colonies/100mL) (Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	250.00	<240 #/100mL	No	This exceedance was due to renovation work being done at the facility.
E Coli. (colonies/100mL) (Monthly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	250.00	<130 #/100mL	No	This exceedance was due to renovation work being done at the facility.
E Coli. (colonies/100mL) (Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/19/2020	1.00	<240 #/100mL	Yes	Resample for above
E Coli. (colonies/100mL) (Monthly Avg)	11/1/2020	11/30/2020	11/13/2020	11/19/2020	1.00	<130 #/100mL	Yes	Resample for above
DO (Min)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	7.40	>7.0 mg/L	Yes	
TRC (Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	<0.01	<0.019 mg/L	Yes	
TRC (Monthly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	<0.01	<0.011 mg/L	Yes	
Total Phosphorus (Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	0.42	2.0 mb/L		**Permit has this as Report Only**-le
Total Phosphorus (Monthly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	0.42	1.0 mg/L		**Permit has this as Report Only**-le
Total Nitrogen (Weekly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	25.30	Report		
Total Nitrogen (Monthly Avg)	11/1/2020	11/30/2020	11/13/2020	11/20/2020	25.30	Report		
Flow	12/1/2020	12/31/2020	12/11/2020	12/18/2020		Report		
pH	12/1/2020	12/31/2020	12/11/2020	12/18/2020	7.54	6.0-9.0	Yes	
CBOD5 (Weekly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	10.00	<45 mg/L	Yes	
CBOD5 (Monthly Average)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	10.00	<30 mg/L	Yes	
TSS (Weekly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	6.00	<45 mg/L	Yes	
TSS (Monthly Average)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	6.00	<30 mg/L	Yes	
Ammonia (May 1 - Oct 31 Weekly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	N/A	<6 mg/L	N/A	
Ammonia (May 1 - Oct 31 Monthly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	N/A	<4 mg/L	N/A	

Test Type	Test Period Start Date	Test Period End Date	Sample Date	Date Received	Result	Limit	Compliance	Notes
Ammonia (Nov 1 - Apr 30 Weekly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	0.80	15 mg/L	Yes	
Ammonia (Nov 1 - Apr 30 Monthly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	0.80	10 mg/L	Yes	
E Coli. (colonies/100mL) (Weekly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	34.00	<240 #/100mL	Yes	
E Coli. (colonies/100mL) (Monthly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	34.00	<130 #/100mL	Yes	
DO (Min)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	7.48	>7.0 mg/L	Yes	
TRC (Weekly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	0.01	<0.019 mg/L	Yes	
TRC (Monthly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	0.01	<0.011 mg/L	Yes	
Total Phosphorus (Weekly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	1.50	2.0 mb/L		**Permit has this as Report Only**-Je
Total Phosphorus (Monthly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	1.50	1.0 mg/L		**Permit has this as Report Only**-Je
Total Nitrogen (Weekly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	26.20	Report		
Total Nitrogen (Monthly Avg)	12/1/2020	12/31/2020	12/11/2020	12/18/2020	26.20	Report		

Asset Description	StartDate	DateDue	WorkflowTitle	WorkOrderDescription	Work Order Priority	Work Order Status	Comments
Water System Customer Service Call - BG - CR - Water District 2			CS - Corrective Work Order	[REDACTED] water leak	Major	Complete	Pin hole in line installed 2" band.
Water System Customer Service Call - BG - CR - Water District 2	7/26/2020 7:33:31 PM	7/26/2020 7:33:31 PM	Road/Driveway Repair Corrective Work Order	Complete road/driveway repair. Refer to recently completed CS Work order for address.	Minor	Complete	
Water System Customer Service Call - BG - CR - Water District 3	8/21/2020 8:56:31 PM	8/21/2020 8:56:31 PM	Road/Driveway Repair Corrective Work Order	Complete road/driveway repair. Refer to recently completed CS Work order for address.	Minor	Complete	
Water Treatment Plant - BG - Center Ridge - Water District 2 - WTP	7/25/2020 10:37:34 PM	7/25/2020 10:37:34 PM	Road/Driveway Repair Corrective Work Order	Complete road/driveway repair. Refer to recently completed CS Work order for address.	Minor	Complete	
Water Treatment Plant - BG - Center Ridge - Water District 3 - WTP			Road/Driveway Repair Corrective Work Order	Fix driveway into well house.	Major	Complete	
Lift Station - BG - Timberland			CS - Corrective Work Order	High wetwell mission alarm, 2hp pump blew coupling. Repaired	Minor	Open	
Wastewater Treatment Plant - BG - River Bluff - WWTP			Sewer Jetting	Line cleaned by jetter at [REDACTED]	Minor	Complete	
Wastewater Treatment Plant - BG - Timberland - WWTP			Sewer Jetting	Line Cleaning. Inlet MH stopped up with grease stopping up collection system. Unstopped and cleaned grease in Lift Station.	Minor	Complete	
Water Treatment Plant - BG - Center Ridge - Water District 2 - WTP			CS - Corrective Work Order	Line repair at blue pine. And primrose	Minor	Complete	

Asset Description	StartDate	DateDue	WorkflowTitle	WorkOrderDescription	Work Order Priority	Work Order Status	Comments
Water System Customer Service Call - BG - CR - Water District 2			CS - Corrective Work Order	Low pressure	Minor	Complete	
Parcel - KY-RB-P- 236	11/20/2020 1:30:00 PM	11/20/2020 1:30:00 PM	CS - Corrective Work Order	██████████ (Bluegrass/River Bluffs) called in to report raw sewage leaking into his from yard from what he believes is a break in the sewer pipe. He said ██████████ with ██████████ circled where the break is in the front yard. contact # ██████████	Emergency	Open	Work was completed by contractor. Invoice will be uploaded when recieved
Water System Customer Service Call - BG - CR - Water District 3	7/24/2020 3:00:00 PM	7/24/2020 3:00:00 PM	CS - Corrective Work Order	██████████ Bluegrass/Center Ridge 3) called to report water just went completely off. .was working fine about 10min prior to call and then nothing. contact # ██████████	Emergency	Closed	Worked on the water line repair had to close a valve to repair the line photo will be on ██████████ workOrder.
Water System Customer Service Call - BG - CR - Water District 1	9/16/2020 8:30:00 AM	9/16/2020 8:30:00 AM	CS - Corrective Work Order	██████████ (Bluegrass/Center Ridge 1) contacted us because a previous completed WO addressed an issue at the entrance of the subdivision/street, but not the meter pit cover near his property, he states that it services his neighbor at ██████████ and was damaged 2 years ago by a construction company building an addition to his home. Please see two attached photos from ██████████. He states that one of the photos shows two water meters - one needs the repair and the other could be removed as there is no longer an address served by it. He has requested that when the repair is scheduled, we please contact him so that he can be on site to make sure the correct one is removed. His phone is ██████████.	Minor	Closed	Will not replace the boxes at this time because of current construction within feet of these boxes. I will replace once construction is completed. Will contact ██████████ and explain this to him. There is no need to pull the extra box due to future expansion.

Asset Description	StartDate	DateDue	WorkFlowTitle	WorkOrderDescription	Work Order Priority	Work Order Status	Comments
Water System Customer Service Call - BG - CR - Water District 2	8/18/2020 11:45:00 AM	8/18/2020 11:45:00 AM	CS - Corrective Work Order	[REDACTED] Bluegrass/Center Ridge 2) Water leak at the base of the hill the house sits on. Leak is coming out decently quick, all clear water too. Customer said it would be noticeable to anyone driving up. Contact # [REDACTED]	Major	Closed	2" clamp
Water System Customer Service Call - BG - CR - Water District 2	9/15/2020 9:30:00 AM	9/15/2020 9:30:00 AM	CS - Corrective Work Order	[REDACTED] (Center Ridge 2/Bluegrass) contacted us because we billed him for water and he states this address has not had water in over 2 years, that the home is vacant. Please verify that this address is vacant and water is off. Thanks!	Minor	Closed	Water is off at [REDACTED].
Water System Customer Service Call - BG - CR - Water District 3	7/6/2020 10:00:00 AM	7/6/2020 10:00:00 AM	CS - Corrective Work Order	[REDACTED] (Bluegrass/Center Ridge 3) called in to report he has been without water for almost a week now. Stated he will have periods of time that he has very low water pressure but 90% of the time the water is completely off. He has had 1 day of a good water pressure in the last week. He would like someone to come out and look into this issue. Contact # [REDACTED]	Emergency	Closed	Water is on
Water System Customer Service Call - BG - CR - Water District 3	8/18/2020 1:30:00 PM	8/18/2020 1:30:00 PM	CS - Corrective Work Order	[REDACTED] (Bluegrass/Center Ridge 3) Water is again leaking from the road into her yard and it is not caused by rain water. It is causing damage to her yard and she would like it to be taken care of as soon as possible. contact # [REDACTED]	Major	Closed	4" pvc main sight a pin hole. Center of blacktop road.
Water System Customer Service Call - BG - CR - Water District 4	8/7/2020 11:00:00 AM	8/7/2020 11:00:00 AM	CS - Corrective Work Order	[REDACTED] (Bluegrass/Center Ridge-4) called to report that she has no water. She checked house valve and the neighbors property and there is no water. Her phone is [REDACTED]	Emergency	Closed	Working on water line was flushing lines

Asset Description	StartDate	DateDue	WorkFlowTitle	WorkOrderDescription	Work Order Priority	Work Order Status	Comments
Water System Customer Service Call - BG - CR - Water District 2	11/23/2020 12:30:00 PM	11/23/2020 12:30:00 PM	CS - Corrective Work Order	(Bluegrass/Center Ridge 2) called to report a leak that is in the road about a 150 feet to the right when looking at her house, she states that her husband has it marked. Her phone is [REDACTED]	Minor	Closed	Two active leaks 25 feet apart installed two repair bands on the 2" service line.
Water System Customer Service Call - BG - CR - Water District 1	9/17/2020 1:15:00 PM	9/17/2020 1:15:00 PM	CS - Corrective Work Order	Please verify if [REDACTED] (Bluegrass/Center Ridge 1) is an existing address. Please also verify if [REDACTED] is an existing address. Thanks!	Minor	Closed	[REDACTED] is an existing address and has a meter. Meter is turned off. There is a camper next door with no address posted. See photos.
Water Treatment Plant - BG - Center Ridge - Water District 2 - WTP			Road/Driveway Repair Corrective Work Order	Repair Driveway at [REDACTED].	Major	Complete	
Water System Customer Service Call - BG - CR - Water District 3	7/8/2020 5:00:00 PM	7/8/2020 5:00:00 PM	CS - Corrective Work Order	[REDACTED] (Bluegrass/Center Ridge 3) Customer water is completely off when he came home from work today. . Checked his main shutoff valve and it is open. Contact # [REDACTED]	Emergency	Closed	Line split. Installed band
Water Treatment Plant - BG - Center Ridge - Water District 2 - WTP			Road/Driveway Repair Corrective Work Order	Road repair at [REDACTED].	Major	Complete	
Wastewater System Customer Service Call - BG - River Bluff	8/18/2020 12:45:00 PM	8/18/2020 12:45:00 PM	CS - Corrective Work Order	[REDACTED] contacted Kentucky 811 and was told that they don't work with Bluegrass. He needs utilities marked for the following. I am including the 811 ticket number as well. [REDACTED] phone is [REDACTED] and email [REDACTED] # [REDACTED] - Locate Rear of Properties.	Minor	Closed	Checked additional properties for sewer lines in the path of new fiber installation. [REDACTED]

Asset Description	StartDate	DateDue	WorkFlowTitle	WorkOrderDescription	Work Order Priority	Work Order Status	Comments
Wastewater System Customer Service Call - BG - River Bluff	8/12/2020 8:30:00 AM	8/12/2020 8:30:00 AM	CS - Corrective Work Order	<p>██████████ contacted Kentucky 811 and was told that they don't work with Bluegrass. He needs utilities marked for the following. I am including the 811 ticket numbers as well. ██████████ phone is ██████████ and email ██████████</p> <p>██████████ Locate rear of properties, include rear utility easement.</p> <p>██████████ Locate rear of properties, include rear utility easement.</p> <p>██████████ Locate entire properties, include rear utility easement, include of way and entire road way in front.</p> <p>██████████ Locate front of property, include of way and entire road way in front.</p> <p>██████████ Locate rear of property, include right of way.</p>	Minor	Closed	Located and marked the mainline on 14 properties including the street. Will follow up once installation begins ██████████
Wastewater System Customer Service Call - BG - River Bluff	7/17/2020 2:45:00 PM	7/17/2020 2:45:00 PM	CS - Corrective Work Order	<p>██████████ (Bluegrass/Riverbluffs) called to report Sewer slowly coming out of manhole behind property. Filling the ditch in the easement with sewage, filling it up. contact # ██████████</p>	Critical	Complete	Removed debris, mostly tree roots from the mainline. Cleaned the line. cleaned up the area And applied lime. We cleaned the line enough to stop the overflow but a follow up of jetting of the line should be done. ██████████ said that this has happened before the last time was about 11 months ago. Receipts associated with this job, auger rental and fuel cost for the generator. ██████████
Water System Customer Service Call - BG - CR - Water District 2	7/17/2020 9:00:00 AM	7/17/2020 9:00:00 AM	CS - Corrective Work Order	<p>██████████ (Bluegrass/Center Ridge-2) ██████████ called to report there is no water at the home. Contact # ██████████</p>	Emergency	Closed	Well pump failure . The entire district. Issues boil water advisory .

Asset Description	StartDate	DateDue	WorkflowTitle	WorkOrderDescription	Work Order Priority	Work Order Status	Comments
Wastewater Treatment Plant - BG - River Bluff - WWTP	10/19/2020 9:45:00 AM	10/19/2020 9:45:00 AM	CS - Corrective Work Order	Turned the blowers and the liftstation pumps back on after power failure	Minor	Open	Turned blowers and pumps in after power failure

Site	Projects Status	Improvements to date/underway	Next Step
River Bluffs	Triage underway- construction permit required	Remote monitoring installed, Aeration system rehabilitation, structural steel repair, influent line replacement	Continue Aeration Rehab, Awaiting Permit For Influent Lift Station Rebuild
Joanne Estates	Triage underway- construction permit required	Remote monitoring installed, Berms have been rebuilt, site regraded, influent lift station rebuilt, yard piping reworked	Awaiting Permit For Process Improvements (Mbbf Conversion), And Disinfection Replacement
Center Ridge Water District 1	Triage underway- construction permit required	Remote monitoring installed with well flow meter, New Chlorine containment installed, building improvements, tanks painted	Awaiting Permit For Well Head Conversion, Continued Improvements
Center Ridge Water District 2	Triage underway- construction permit required	Remote monitoring installed with well flow meter, New Chlorine containment installed, building improvements, tanks painted, well 2 rehab underway	Awaiting Permit For Well Head Conversion, Continued Improvements
Center Ridge Water District 3	Triage underway- construction permit required	Remote monitoring installed with well flow meter, New Chlorine containment installed, building improvements, tanks painted, new well containment installed	Awaiting Permit For Well Head Conversion, Continued Improvements
Center Ridge Water District 4	Triage underway- construction permit required	Remote monitoring installed with well flow meter, New Chlorine containment installed, building improvements, tanks painted	Continued Improvements

**COMMONWEALTH OF KENTUCKY
ENERGY AND ENVIRONMENT CABINET
DIVISION OF ENFORCEMENT
CASE NO. DOW 20-3-0002**

**IN RE: River Bluffs Inc.
River Bluffs Wastewater Treatment Plant
13121 Creekview Road
Prospect, KY 40059
AI No. 3367
Activity ID No. ERF20200001**

AGREED ORDER

WHEREAS, the parties to this Agreed Order, the Energy and Environment Cabinet (hereinafter "Cabinet") and Bluegrass Water Utility Operating Company, LLC (hereinafter "BWUOC") state:

STATEMENTS OF FACT

1. The Cabinet is charged with the statutory duty of enforcing KRS Chapter 224 and the regulations promulgated pursuant thereto.
2. BWUOC is an active Kentucky Limited Liability Company in good standing that owns and operates utilities and whose principal address according to the Kentucky Secretary of State, is 1650 Des Peres Road, Suite 303, St. Louis, Missouri 63131.
3. River Bluffs Wastewater Treatment Plant (hereinafter "River Bluffs WWTP" or "facility"), is located at 13121 Creekview Road, Prospect, Kentucky 40059. The facility has a design capacity of 0.066 million gallons per day and discharges to an unnamed tributary of Pond Creek.
4. River Bluffs WWTP is currently owned and operated by River Bluffs, Inc. The facility's discharges are permitted under Kentucky Pollutant Discharge Elimination Systems

(hereinafter "KPDES") permit number KY0043150, issued by the Cabinet's Division of Water (hereinafter "DOW"). The facility's KPDES permit expires on December 31, 2024.

5. River Bluffs, Inc. is an active for-profit Kentucky corporation in good standing, according to the Kentucky Secretary of State.

6. BWUOC has indicated to the Cabinet that it plans to acquire River Bluffs WWTP, provided it receives from the Kentucky Public Service Commission ("Commission") all approvals required to make the acquisition. If the Commission approves the acquisition, BWUOC plans to assume ownership and operation of River Bluffs WWTP on or around March 31, 2020.

7. BWUOC has contracted with a third-party firm to produce an engineering memorandum detailing the status of and repairs needed at River Bluffs WWTP (Exhibit A). This report was submitted to the Cabinet on or about January 2, 2020.

8. If it receives all required Commission approvals, BWUOC has indicated to the Cabinet that it plans to make substantial repairs and/or upgrades to the facility to address the deficiencies noted in Exhibit A.

NOW THEREFORE, in the interest of providing corrective actions to River Bluffs WWTP, the parties hereby consent to the entry of this Agreed Order and agree as follows:

REMEDIAL MEASURES

9. BWUOC shall notify the Cabinet in writing that it has assumed ownership and operation of River Bluffs WWTP within fifteen (15) days of acquiring the facility.

10. Within fifteen (15) days of assuming ownership and operation of the facility, BWUOC shall submit a "Change in Ownership Certification" to the Cabinet.

11. At all times, commencing with assuming ownership of the facility, BWUOC shall provide for proper operation and maintenance of the facility in accordance with 401 KAR 5:065

Section 2(1).

12. Following the initial ninety (90) days of its operation of the facility, BWUOC shall submit to the Cabinet for review and acceptance, a written Corrective Action Plan (hereinafter "CAP") to bring the facility into compliance with its KPDES permit and correct the deficiencies noted in Exhibit A. The CAP shall include, but not be limited to, an identification of actions BWUOC shall implement to ensure compliance that includes; proper operation and maintenance to its sewage treatment system, collection system, and disinfection unit. The CAP shall also include a list of all actions necessary to ensure the completion of upgrades to its facility including a list of completion dates for each action. Include in the CAP a final compliance date for completion of all remedial measures listed;

- A. Upon review of the CAP, the Cabinet may, in whole or in part, (1) accept or (2) decline and provide comments to BWUOC identifying the deficiencies. Upon receipt of Cabinet comments, BWUOC shall have ninety (90) days to revise and resubmit the CAP for review and acceptance. Upon resubmittal, the Cabinet may, in whole or in part, (1) accept or (2) disapprove and provide comments to BWUOC identifying the deficiencies. Upon such resubmittal, if the CAP is disapproved, the Cabinet may deem BWUOC to be out of compliance with this Agreed Order for failure to timely submit the CAP. The parties to this Agreed Order may also agree in writing to further extend the period in which BWUOC and the Cabinet accept a revised and resubmitted CAP.
- B. BWUOC may request an amendment of the accepted CAP by writing the Director of the Division of Enforcement at 300 Sower Blvd., Frankfort,

Kentucky 40601 and stating the reasons for the request. If granted, the amended CAP shall not affect any provision of this Agreed Order unless expressly provided in the amended CAP. This does not require an amendment request pursuant to paragraph 20 of this Agreed Order.

- C. Upon Cabinet acceptance of all or any part of the CAP, the amended CAP or any accepted part thereof (provided that the accepted part is not dependent upon implementation of any part not yet accepted), shall be deemed incorporated into this Agreed Order as an enforceable requirement of this Agreed Order. This does not require an amendment request pursuant to paragraph 20 of this Agreed Order.

13. So long as BWUOC is in compliance with the terms and conditions of this Agreed Order, the Cabinet's Division of Enforcement agrees to hold any formal enforcement action for numeric permit parameter violations for the KPDES permit described in paragraph 4, in abeyance. Should BWUOC fail to comply with the terms and conditions of this Agreed Order, the Cabinet may seek formal enforcement action that would have otherwise been held in abeyance.

14. By the final compliance date in the accepted CAP, BWUOC shall be in full compliance with its KPDES permit.

15. All submittals required by the terms of this Agreed Order shall be submitted to: Division of Enforcement, Attention: Director, 300 Sower Blvd., Frankfort, Kentucky, 40601.

MISCELLANEOUS PROVISIONS

16. This Agreed Order shall be of no force and effect unless BWUOC assumes ownership and operations of River Bluffs WWTP.

17. This Agreed Order addresses only the items described above. Other than the matters agreed to by entry of this Agreed Order, nothing contained herein shall be construed to waive or to limit any remedy or cause of action by the Cabinet based on statutes or regulations under its jurisdiction and BWUOC reserves its defenses thereto. The Cabinet expressly reserves its right at any time to issue administrative orders and to take any other action it deems necessary that is not inconsistent with this Agreed Order, including the right to order all necessary remedial measures, assess penalties for violations, or recover all response costs incurred, and BWUOC reserves its defenses thereto.

18. This Agreed Order shall not prevent the Cabinet from issuing, reissuing, renewing, modifying, revoking, suspending, denying, terminating, or reopening any permit to BWUOC. BWUOC reserves its defenses thereto, except that BWUOC shall not use this Agreed Order as a defense.

19. BWUOC waives its right to any hearing on the matters admitted herein. However, failure by BWUOC to comply strictly with any or all of the terms of this Agreed Order shall be grounds for the Cabinet to seek enforcement of this Agreed Order in Franklin Circuit Court and to pursue any other appropriate administrative or judicial action under KRS Chapter 224 and the regulations promulgated pursuant thereto.

20. The Agreed Order may not be amended except by a written order of the Cabinet's Secretary or a designee thereof. BWUOC may request an amendment by writing the Director of the Division of Enforcement at 300 Sower Blvd., Frankfort, Kentucky 40601, and stating the reasons for the request. If granted, the amended Agreed Order shall not affect any provision of this Agreed Order unless expressly provided in the amended Agreed Order.

21. The Cabinet does not, by its consent to the entry of this Agreed Order, warrant or aver in any manner that BWUOC's complete compliance with this Agreed Order will result in compliance with the provisions of KRS Chapter 224 and the regulations promulgated pursuant thereto. Notwithstanding the Cabinet's review and approval of any plans formulated pursuant to this Agreed Order, BWUOC shall remain solely responsible for compliance with the terms of KRS Chapter 224 and the regulations promulgated thereto, this Agreed Order, and any permit and compliance schedule requirements.

22. BWUOC shall give notice of this Agreed Order to any purchaser, lessee or successor in interest prior to the transfer of ownership and/or operation of any part of the facility occurring prior to termination of this Agreed Order, shall notify the Cabinet that such notice has been given, and shall follow all statutory requirements for a transfer.

23. This Agreed Order applies specifically and exclusively to the unique facilities referenced herein and is inapplicable to any other facility.

24. Compliance with this Agreed Order is not conditional on the receipt of any federal, state, or local funds.

25. This Agreed Order shall be of no force and effect unless and until it is entered by the Secretary or a designee thereof as evidenced by his or her signature thereon. If this Agreed Order contains any date by which BWUOC is to take any action or cease any activity, and the Secretary enters the Agreed Order after that date, then BWUOC is nonetheless obligated to have taken the action or ceased the activity by the date contained in this Agreed Order.

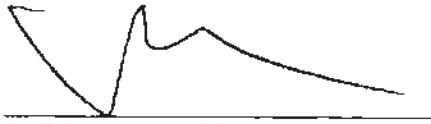
TERMINATION

26. This Agreed Order shall terminate upon BWUOC's completion of all requirements described in this Agreed Order. BWUOC may submit written notice to the Cabinet when it believes

all requirements have been performed. The Cabinet shall notify BWUOC in writing whether it concurs that all requirements of this Agreed Order have been completed. The Cabinet reserves its right to enforce this Agreed Order, and BWUOC reserves its right to file a petition for hearing pursuant to KRS 224.10-420(2) contesting the Cabinet's determination.

CASE NO. DOW 20-3-0002

AGREED TO BY:



Josiah Cox, President
Bluegrass Water Utility Operating Company, LLC

3-26-2020

Date

APPROVAL RECOMMENDED BY:


Michael B. Kroeger, Director *Asst. Dir.*
Division of Enforcement

4/1/2020
Date

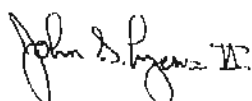

Elizabeth U. Natter, Executive Director
Office of General Counsel

August 10, 2020
Date

ORDER

Wherefore, the foregoing Agreed Order is entered as the final Order of the Energy and Environment Cabinet this 12th day of November, 2020.

ENERGY AND ENVIRONMENT CABINET



FOR

REBECCA W. GOODMAN, SECRETARY of the
ENERGY AND ENVIRONMENT CABINET

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing **AGREED ORDER** was mailed, postage prepaid, to the following this 12th day of November, 2020.

Bluegrass Water Utility Operating Company, LLC
Attn: Jacob Freeman
1650 Des Peres Road, Suite 303
St. Louis, MO 63131

And ~~mailed~~, messenger to:

Michael B. Kroeger, Director
Division of Enforcement
300 Sower Blvd.
Frankfort, Kentucky 40601

Elizabeth U. Natter, Executive Director
Office of General Counsel
Energy and Environment Cabinet
300 Sower Blvd.
Frankfort, Kentucky 40601



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COMMONWEALTH OF KENTUCKY
ENERGY AND ENVIRONMENT CABINET
DIVISION OF ENFORCEMENT
CASE NO. DOW 20-3-0001

IN RE: Joann Estates Utilities, Inc.
Timberland Wastewater Treatment Plant
6500 US Highway 60 W
Paducah, KY 42001
Al No. 3070
Activity ID No. ERF20200001

AGREED ORDER

WHEREAS, the parties to this Agreed Order, the Energy and Environment Cabinet (hereinafter "Cabinet") and Bluegrass Water Utility Operating Company, LLC (hereinafter "BWUOC") state:

STATEMENTS OF FACT

1. The Cabinet is charged with the statutory duty of enforcing KRS Chapter 224 and the regulations promulgated pursuant thereto.
2. BWUOC is an active Kentucky Limited Liability Company in good standing that owns and operates utilities and whose principal address, according to the Kentucky Secretary of State is 1650 Des Peres Road, Suite 303, Saint Louis, Missouri 63131.
3. Timberland Wastewater Treatment Plant (hereinafter "Timberland WWTP" or "facility"), is located on Timberland Drive, Paducah, McCracken County, Kentucky 42086. The facility has a design capacity of 0.025 million gallons per day and discharges to West Fork Massac Creek.
4. Timberland WWTP is currently owned and operated by Joann Estates Utilities, Inc. The facility's discharges are permitted under Kentucky Pollutant Discharge Elimination Systems

(hereinafter "KPDES") permit number KY0083755, issued by the Cabinet's Division of Water (hereinafter "DOW"). The facility's KPDES permit expires on January 31, 2025.

5. Joann Estates Utilities, Inc. is an active for-profit Kentucky corporation in good standing, according to the Kentucky Secretary of State.

6. BWUOC has indicated to the Cabinet that it plans to acquire Timberland WWTP, provided it receives from the Kentucky Public Service Commission ("Commission") all approvals required to make the acquisition. If the Commission approves the acquisition, BWUOC plans to assume ownership and operation of Timberland WWTP on or around March 31, 2020.

7. BWUOC has contracted with a third-party firm to produce an engineering memorandum detailing the status of and repairs needed at Timberland WWTP (Exhibit A). This report was submitted to the Cabinet on or about January 2, 2020.

8. If it receives all required Commission approvals, BWUOC has indicated to the Cabinet that it plans to make substantial repairs and/or upgrades to the facility to address the deficiencies noted in Exhibit A.

NOW THEREFORE, in the interest of providing corrective actions to Timberland WWTP, the parties hereby consent to the entry of this Agreed Order and agree as follows:

REMEDIAL MEASURES

9. BWUOC shall notify the Cabinet in writing that it has assumed ownership and operation of Timberland WWTP within fifteen (15) days of acquiring the facility.

10. Within fifteen (15) days of assuming ownership and operation of the facility, BWUOC shall submit a "Change in Ownership Certification" to the Cabinet.

11. At all times, commencing with assuming ownership of the facility, BWUOC shall provide for proper operation and maintenance of the facility in accordance with 401 KAR 5:065

Section 2(1).

12. Following the initial ninety (90) days of its operation of the facility, BWUOC shall submit to the Cabinet for review and acceptance, a written Corrective Action Plan (hereinafter "CAP") to bring the facility into compliance with its KPDES permit and correct the deficiencies noted in Exhibit A. The CAP shall include, but not be limited to, an identification of actions BWUOC shall implement to ensure compliance that includes; proper operation and maintenance to its sewage treatment system, collection system, and disinfection unit. The CAP shall also include a list of all actions necessary to ensure the completion of upgrades to its facility including a list of completion dates for each action. Include in the CAP a final compliance date for completion of all remedial measures listed;

- A. Upon review of the CAP, the Cabinet may, in whole or in part, (1) accept or (2) decline and provide comments to BWUOC identifying the deficiencies. Upon receipt of Cabinet comments, BWUOC shall have ninety (90) days to revise and resubmit the CAP for review and acceptance. Upon resubmittal, the Cabinet may, in whole or in part, (1) accept or (2) disapprove and provide comments to BWUOC identifying the deficiencies. Upon such resubmittal, if the CAP is disapproved, the Cabinet may deem BWUOC to be out of compliance with this Agreed Order for failure to timely submit the CAP. The parties to this Agreed Order may also agree in writing to further extend the period in which BWUOC and the Cabinet accept a revised and resubmitted CAP.
- B. BWUOC may request an amendment of the accepted CAP by writing the Director of the Division of Enforcement at 300 Sower Blvd., Frankfort,

Kentucky 40601 and stating the reasons for the request. If granted, the amended CAP shall not affect any provision of this Agreed Order unless expressly provided in the amended CAP. This does not require an amendment request pursuant to paragraph 20 of this Agreed Order.

- C. Upon Cabinet acceptance of all or any part of the CAP, the amended CAP or any accepted part thereof (provided that the accepted part is not dependent upon implementation of any part not yet accepted), shall be deemed incorporated into this Agreed Order as an enforceable requirement of this Agreed Order. This does not require an amendment request pursuant to paragraph 20 of this Agreed Order.

13. So long as BWUOC is in compliance with the terms and conditions of this Agreed Order, the Cabinet's Division of Enforcement agrees to hold any formal enforcement action for numeric permit parameter violations for the KPDES permit described in paragraph 4, in abeyance. Should BWUOC fail to comply with the terms and conditions of this Agreed Order, the Cabinet may seek formal enforcement action that would have otherwise been held in abeyance.

14. By the final compliance date in the accepted CAP, BWUOC shall be in full compliance with its KPDES permit.

15. All submittals required by the terms of this Agreed Order shall be submitted to: Division of Enforcement, Attention: Director, 300 Sower Blvd., Frankfort, Kentucky, 40601.

MISCELLANEOUS PROVISIONS

16. This Agreed Order shall be of no force and effect unless BWUOC assumes ownership and operations of Timberland WWTP.

17. This Agreed Order addresses only the items described above. Other than the matters agreed to by entry of this Agreed Order, nothing contained herein shall be construed to waive or to limit any remedy or cause of action by the Cabinet based on statutes or regulations under its jurisdiction and BWUOC reserves its defenses thereto. The Cabinet expressly reserves its right at any time to issue administrative orders and to take any other action it deems necessary that is not inconsistent with this Agreed Order, including the right to order all necessary remedial measures, assess penalties for violations, or recover all response costs incurred, and BWUOC reserves its defenses thereto.

18. This Agreed Order shall not prevent the Cabinet from issuing, reissuing, renewing, modifying, revoking, suspending, denying, terminating, or reopening any permit to BWUOC. BWUOC reserves its defenses thereto, except that BWUOC shall not use this Agreed Order as a defense.

19. BWUOC waives its right to any hearing on the matters admitted herein. However, failure by BWUOC to comply strictly with any or all of the terms of this Agreed Order shall be grounds for the Cabinet to seek enforcement of this Agreed Order in Franklin Circuit Court and to pursue any other appropriate administrative or judicial action under KRS Chapter 224 and the regulations promulgated pursuant thereto.

20. The Agreed Order may not be amended except by a written order of the Cabinet's Secretary or a designee thereof. BWUOC may request an amendment by writing the Director of the Division of Enforcement at 300 Sower Blvd., Frankfort, Kentucky 40601, and stating the reasons for the request. If granted, the amended Agreed Order shall not affect any provision of this Agreed Order unless expressly provided in the amended Agreed Order.

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22. BWUOC shall give notice of this Agreed Order to any purchaser, lessee or successor in interest prior to the transfer of ownership and/or operation of any part of the facility occurring prior to termination of this Agreed Order, shall notify the Cabinet that such notice has been given, and shall follow all statutory requirements for a transfer.

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TERMINATION

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all requirements have been performed. The Cabinet shall notify BWUOC in writing whether it concurs that all requirements of this Agreed Order have been completed. The Cabinet reserves its right to enforce this Agreed Order, and BWUOC reserves its right to file a petition for hearing pursuant to KRS 224.10-420(2) contesting the Cabinet's determination.

CASE NO. DOW 20-3-0001

AGREED TO BY:



Josiah Cox, President
Bluegrass Water Utility Operating Company, LLC

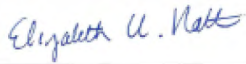
3-26-2020
Date

APPROVAL RECOMMENDED BY:



Michael B. Kroeger, Director ~~Asst. Dir.~~ Dir
Division of Enforcement

4/1/2020
Date



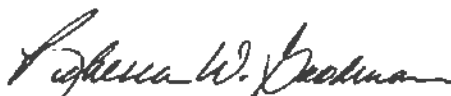
Elizabeth U. Natter, Executive Director
Office of General Counsel

August 10, 2020
Date

ORDER

Wherefore, the foregoing Agreed Order is entered as the final Order of the Energy and Environment Cabinet this 10 day of August, 2020.

ENERGY AND ENVIRONMENT CABINET



REBECCA W. GOODMAN, SECRETARY of the
ENERGY AND ENVIRONMENT CABINET

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing **AGREED ORDER** was mailed, postage prepaid, to the following this 10 day of August, 2020.

Bluegrass Water Utility Operating Company, LLC
Attn: Jacob Freeman
1650 Des Peres Road, Suite 303
St. Louis, MO 63131

And ~~via electronic mail~~: Electronically mailed to:

Michael B. Kroeger, Director
Division of Enforcement
300 Sower Blvd.
Frankfort, Kentucky 40601

Elizabeth U. Natter, Executive Director
Office of General Counsel
Energy and Environment Cabinet
300 Sower Blvd.
Frankfort, Kentucky 40601



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