

COMMONWEALTH OF KENTUCKY
ENERGY AND ENVIRONMENT CABINET
DIVISION OF ENFORCEMENT
CASE NO. DOW 21-3-0028

IN RE: Delaplain Disposal Company
Delaplain Disposal WWTP
249 West Yusen Drive.
Georgetown, KY 40324
AI No. 3901
Activity ID No. ERF20210001

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. Delaplain Disposal Wastewater Treatment Plant (hereinafter “Delaplain,” “Delaplain WWTP” or “facility”), is located at 249 West Yusen Drive, Georgetown, Kentucky 40324. The facility has a design capacity of 0.24 million gallons per day and discharges to an unnamed tributary of Dry Run.
4. Delaplain WWTP is currently owned and operated by Delaplain Disposal Company. The facility’s discharges are permitted under Kentucky Pollutant Discharge Elimination

Systems (hereinafter “KPDES”) permit number KY0079049, issued by the Cabinet’s Division of Water (hereinafter “DOW”). The facility’s KPDES permit expires on January 31, 2026.

5. Delaplain Disposal Company 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 Delaplain 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 Delaplain WWTP on or around March 1, 2021.

7. BWUOC has contracted with a third-party firm to produce an engineering memorandum detailing the status of and repairs needed at Delaplain WWTP (Exhibit A). This report was submitted to the Cabinet on or about January 26, 2021.

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 Delaplain 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 Delaplain 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. Within thirty (30) days of execution of this Agreed Order, 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 Delaplain 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.

AGREED TO BY:


Josiah Cox (Aug 10, 2021 11:18 CDT)

Josiah Cox, President
Bluegrass Water Utility Operating Company, LLC

Aug 10, 2021
Date

APPROVAL RECOMMENDED BY:

Michael B. Kroeger, Director
Division of Enforcement

Date

Elizabeth U. Natter, Executive Director
Office of General Counsel

Date

ORDER

Wherefore, the foregoing Agreed Order is entered as the final Order of the Energy and Environment Cabinet this ____ day of _____, 2021.

ENERGY AND ENVIRONMENT CABINET

John S. Lyons, Deputy Secretary
Authorized Designee, Rebecca W. Goodman,
Secretary Energy & 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 _____ day of _____, 2021.

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

DOCKET COORDINATOR

Exhibit A

Civil Engineering
Surveying & Mapping
Potable Water
Wastewater Treatment



Civil Site Design
Construction Support
Transportation
Wastewater Collection

The Delaplain Disposal – Delaplain WWTP KY0079049
Kentucky
Engineering Memorandum
Date: September 11, 2020

Introduction

The Delaplain wastewater treatment facility is located north of Georgetown, Kentucky approximately 19 miles north of Lexington, Kentucky. This facility services 290 residences and 33 commercial or industrial contributors. The system operates under Kentucky DEP Permit number KY0079049 and Agency ID number 3901.

Existing Flows and Loadings and Projections

The existing facility is authorized to treat up to 240,000 gpd.

According to the permit application submitted by Delaplain Disposal Co., the flow contribution is 55% commercial and 45% industrial. According to data available on EPA's Echo site and data submitted to 21 Design Group, Inc. by current ownership, the flows to the facility for 2020 are very roughly approximated below:

- Annual Average Daily Flow – 240,000 – 260,000 gpd
- **Maximum Monthly Average Daily Flow – 360,000 gpd**
- Maximum Weekly Average Daily Flow – 475,000 gpd
- Maximum Daily Average Daily Flow – 910,000 gpd
- Peak Hourly Flow – 1,200,000 gpd

The maximum monthly average daily flow and peak flows are concerning relative to the existing rated capacity and plant size. The plant has a clarifier that is 1/3 of the required size at this time. This is consistent with the current ownership's believe that I&I is a problem and flow equalization would be helpful, and it also makes some sense of the excursions in TSS (during wet weather).

The flow peaking factor for the facility is clearly significant, and because of the significant commercial contribution, it's very likely that there's significant variability and spikes in BOD, TSS and ammonia loadings. During excursions in the past, BOD levels were significantly higher than TSS levels, indicating incomplete treatment. We know that one of the original 50-hp centrifugal blowers was replaced recently (to maintain current capacity rating, not to increase aeration capacity), and it's likely that this improvement was made to address the high BOD events observed. It is unclear at this time if the improvement to blower capacity will meet demands from the flow and loading spikes, but it would seem likely that the blower capacity is inadequate based on current vs design flows.

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Based on what we've seen and heard to date, the significant industrial contributor has not historically become an issue in operation or in permit compliance.

Based on discussions with current Ownership, the local region is growing rapidly, the area serviced is growing, and they anticipate growth in flows and loadings.

Permit Limitations and Historical Compliance Performance

The plant is authorized to discharge up to 240,000 gallons per day (gpd) by the KDEP per the operating permit. As discussed above, the facility has discharged flows significantly in excess of this value a number of months this year and is likely to exceed this annual flow rate in 2020.

A summary of the existing permit limits is described below:

- BOD5 – 10/15 mg/L (Monthly average/Maximum Weekly Average)
- TSS – 30/45 mg/L
- NH3-N – 2/3 mg/L
- NH3-N – 5/7.5 mg/L
- E-Coli – 130/240 mpn/100 ml
- Total Residual Chlorine – 0.011/0.019 mg/L
- Total Phosphorus – Report Only
- Total Nitrogen – Report Only
- Dissolved Oxygen – No limit



A review was performed of EPA's Echo compliance website which lists violations of wastewater treatment plants across the country. The Delaplain

wastewater treatment plant has exceeded permit limitations several times in recent months and years for Total Suspended Solids, Ammonia Nitrogen, Total Residual Chlorine, E-Coli, and CBOD5.

Wastewater Treatment Facility Existing Conditions

The original facility included the following features:

- Two influent lines; one comes by gravity from the east side of the facility, and the other enters via forcemain from the west side of the facility.
- Comminutor to grind and remove influent solids
- Manually cleaned bar screen
- Aeration tank
- Two 50 hp centrifugal blowers used to aerate the aeration tank

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- Circular clarifier with scum collection and air lift of scum to digester
 - RAS/WAS box
 - Surge Chamber and transfer pump to convey stored wastewater into the aeration tank
 - Aerobic Digester
 - Chlorine feed point and chlorine contact tanks
 - Dechlorination feed point and dechlorination contact tanks
 - Control panels for various subcomponents in the system including the controls for the clarifier, blowers, and surge tank transfer pumps.
 - PD blower that appears to serve the aerobic

The existing facility has aged, showing the need for fresh coatings, protection from exposed wires, and spot welding repairs, but it is in relatively good working order.

The comminutor is no longer utilized, and the manual bar screen appears to result in overflows periodically from the uncleaned bar screen rack. The air pattern in the aeration tank indicates relatively turbulent mixing conditions using coarse bubble diffuser design that would likely not be improved significantly with diffuser replacement. It was unclear whether the surge tank is utilized or if the surge tank transfer pumps are in working condition. The existing gaseous chlorine and gaseous sulfur dioxide systems were in working condition according to the operators (however the chemical solution feed lines were not evident).

Functionality of the Existing System

The functionality of the existing plant is similar to other activated sludge systems. However, this system is challenged by:

- **The system is seeing flows (and most likely loadings) significantly in excess of original capacity.** This results in the need to carry very high mixed liquor concentrations and to maintain a very healthy sludge age in a limited range or face challenges during wet weather to retain biomass. (Based on effluent results, it appears this is a real problem here).
- The existing clarifier has a 10' depth and a 25' diameter. Because the 10-State Standards require 12' deep clarifiers, this tank is not acceptable as a secondary clarifier for activated sludge systems. At the maximum 10-State Standards surface overflow rate of 1,000 gpd/sf, the 25' diameter clarifier can only handle peak flows up to about 490,000 gpd. The peak daily flow and peak hourly flows to the plant significantly exceed this flow rate at this time, so the clarifier is very undersized for use in an activated sludge application.
- There is only 1-large zone of treatment, and it's difficult to make system repairs without multiple tanks to allow the system to be taken off line.
- There are no provisions evident for using the surge tank beyond overflowing the bar screen. It is currently not convenient to use the surge tank.
- There is only 1-operating blower for the aeration tank, and because it's centrifugal and there's no modulating inlet suction valve or VFD, it's either on or off.

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-
- It doesn't appear to include provisions for decanting supernatant from the digester (which is most likely undersized now).
 - The contact time for disinfection appears to be limited.
 - The current ownership believes the previous operator did not perform well; a new, effective operator has taken over recently.
 - The use of gaseous chlorine and gaseous sulfur dioxide poses addition risks to operators and the neighboring community, and it's somewhat uncommon to many operators.
 - Currently no remote monitoring is in place at the site. This makes it difficult for the operators to know when the facility is failing. Operational monitoring should be completed to monitor the quality of effluent, which should then be compared to the operating permit.

Wastewater Treatment Facility Recommended Improvements

- Because the facility receives flows and loadings in excess of current capacity (by roughly 40-50%), we believe there will be a need to upgrade the system BOD, TSS and NH3-N reduction capacity. We also believe the facility faces excessive I&I, so flow equalization and an influent pump station will be helpful to reduce demands on the final clarifier.
- The failure of the original comminutor results in the need to collect significant screenings in multiple 5-gallon buckets. We recommend the addition of a mechanically cleaned screen for this application.
- The improvements proposed to integrate the above two recommendations includes the addition of a "roughing" MBBR (targeting 70% BOD reduction in a 40 minute hydraulic retention time or 10,000 gallons); the addition of equalization with 4-hours of hydraulic retention time or 60,000 gallons and an influent pump station with variable frequency drives with an influent flow meter; the addition of metal salt addition in the EQ and clarifier to improve solids capture during wet weather, and the addition of a tertiary auto-strainer for solids separation downstream of the existing clarifier.
 - Note that a variance will be required for acceptance of the secondary clarifier due to the 10' deep tank height and the high surface overflow rate.
 - This improvement is expected to reduce peak flows to the clarifier by up to 25%
 - This improvement is expected to reduce the required mixed liquor concentration by as much as 70% without requiring modifications to the existing aeration header or blowers.
 - This improvement is expected to minimize solids carry over into the clarifier during peak flow events relative to existing conditions.
- We recommend the addition of current density baffles to the side wall of the clarifier (in addition to the above described roughing MBBR and EQ tank improvements) to improve clarifier performance and to allow for regulatory acceptance of surface overflow rates in excess of the typically allowable surface overflow rates. The new roughing MBBR could be used in conjunction with the use of the new EQ tank for temporary clarification to achieve temporary treatment during installation of the current density baffles.

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- The addition of a tertiary automatic straining system will add protection for the system from BOD and TSS excursions during wet weather events.
- The use of an in-line UV disinfection system will be used to achieve compliance with the disinfection requirements. (Note that the industrial contribution could impact UVT transmittance and this should be checked over a period of several samples prior to ordering equipment).
- While the above improvements should allow a good operator to significantly improve performance, the addition of an alum feed system to promote improved solids capture during wet weather events (in both the equalization tank and in the clarifier) will provide a margin of error to allow the system to achieve considerably improved permit compliance.
- There is a potential that a second clarifier will be required at some point in the future if I/I issues increase.

Wastewater Collection System Understanding

The collection system consists of gravity sewer as well as five separate lift stations. The plant has an hourly peak flow factor of almost 6:1, so I and I is considered a large issue for the collection system and should be dealt with sooner rather than later as it is negatively affecting the plants ability to meet the effluent discharge limits enforced by Kentucky. (Note however that while the 4:1 peak day: average day flow peaking factor and the 6:1 peak hour: average day ratios cause problems within this plant, they aren't large peaking factors relative to many plants. Some degree of I/I reduction can be expected, but we are not likely to achieve 2:1 or even 3:1 peaking factors with I/I reductions).

Industrial Pump Station 1 is located directly south of the wastewater facility along Interstate 75 and conveys all of the systems wastewater to the treatment plant. The wet well is outfitted with dual 20 hp non-clog pumps from Myers and has a discharge force main diameter of 6". Moonlake Pump Station 1 conveys wastewater through 4" force main across Interstate 75 directly to Industrial Park Pump Station 1 and is outfitted with dual 25 hp pumps from Myers. The station is poorly located in terms of ease of access, which will make maintenance and upgrades difficult to perform. A list of Pump Stations with specifications for each pump is located in the Appendix.

Wastewater Collection System Recommended Improvements

- GIS shapefiles should be developed for future maintenance. System mapping at the fingertips of the operators will enhance the level of service and timing of responses to emergency and customer issues.
- Install flow monitoring, perform smoke testing, perform video inspection at selected locations, evaluate systems and create GIS based maintenance priority list to help understand and reduce the effect of I and I on the system.
- A manual transfer switch should be installed at each lift station to allow for the use of a portable generator during emergencies.

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APPENDIX



Aeration Tank



Circular Clarifier

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Bar Screen



Gaseous Chlorine Storage

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Industrial Pump Station 1 (INPS1)

#1 Pump - 9/11/13: Myers 4" non-clog pump, 20 hp, 230 volt, 3 phase, 10" impeller Model #4VC200M4-23, SN 10013516

#2 Pump - 5/29/18: Myers 4" non-clog pump, 20 hp, 230volt, 3phase, w/50' cord, upper & lower T.C. seals and 10" oversized impeller SN 10554284

Industrial Pump Station #2 (INPS2)

#1 Pump - 12/14/12: Meyers 4VH75M4-23, 7.5 hp, 230 volt, 26 amps, 60 hertz, 3 phase, SN 00165030.
11/2018 - extensive rebuild - Clark Electric.

#2 Pump 12/28/2018: Meyers MY 4VH75M4-23, 7.5 hp, 230 volt, 3 phase, 35' cord, 8" oversize impeller. SN 10582019.

Moon Lake Pump Station #1 (ML1)

#1 pump - 2/18/15: 4RCX250M2-43-35, 25 hp 3/460 volt with 35' cable. Lower TX seal, 5.88" oversized impeller. SN 10080201

#2 pump - 5/19/14: 4RCX250M2-43-35 25HP 3/460 volt with 35' cable. SN 10246932

Moon Lake Pump Station #2 (ML2)

#1 Pump - 10/2016: Myers 4V75M4-23-35 4" sewage pump 7.5 hp, 230 volt 3 phase w/standard seals and 35'cord serial 7.5" std impeller, SN10365415.

2 Pump - 8/2017 Myers 4V75M4-23 7 ½ hp, 3 ph, 230 volt, SN 10519205

Riffton Meadows Pump Station (RM)

#1 Pump - 2007: WGX30H-21-25, 3 hp, 3450 RPM, 230 volt, 1 phase, Impeller 5" SN GX304-4-25

#2 Pump - 2007: WGX30H-21-25, 3 hp, 3450 RPM, 230 volt, 1 phase, Impeller 5"

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Final Audit Report

2021-08-10

Created:	2021-08-09
By:	Mandy Keubler (mkeubler@cswrgroup.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAGjmcUz75rg0q87iMyBXrQysNU0ZpewV3

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