Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to \$25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Department for Environmental Protection
Division of Enforcement
300 Sower Blvd, 3rd Floor
Frankfort, KY 40601
502-782-6859 (7:45 AM – 3:45 PM)
Donald Polly, Enforcement Specialist

Issued By:

Donald Polly

Environmental Enforcement Specialist Compliance and Operations Branch

Date: January 17, 2018

How Delivered: Certified Mail Certified/Registered # 7015 3430 0000 4914 9912

MATTHEW G. BEVIN
GOVERNOR



CHARLES G. SNAVELY
SECRETARY

ENERGY AND ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION

AARON B. KEATLEY

COMMISSIONER

300 SOWER BOULEVARD FRANKFORT, KENTUCKY 40601

May 31, 2018

Certified No. 7010 0290 0001 4823 0069

Longview Country Club c/o LH Treatment Co LLC Attn: Manager or Superintendent 134 Prater Drive Georgetown, KY 40324

Re: Notice of Violation

AI ID: 8083

AI Name: L H Treatment Company LLC

Activity ID: ENV20180002 Water Withdrawal Permit: #1173

Scott County, KY

Dear Manager/Superintendent:

The Kentucky Department for Environmental Protection (DEP) has issued the enclosed Notice of Violation for violations discovered at your facility. Please review this Notice of Violation carefully to ensure that all remedial measures are completed by the specified deadlines.

If you have any questions regarding the water withdrawal program and instructions on how to submit the missing reports, please contact Ms. Chloe Brantley at 502-782- 6898 or by email at Chloe.Brantley@ky.gov. If you have any questions regarding enforcement procedures please contact myself at 502-782-6855 or by email at Marlon.Bascombe@ky.gov.

Sincerely,

E-Signed by Bascombe, Marlon ERIFY authenticity with eSign Deskto

Marlon Bascombe Environmental Enforcement Specialist Division of Enforcement

Enclosure



COMMONWEALTH OF KENTUCKY ENERGY and ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION Division of Enforcement

NOTICE OF VIOLATION

To: Longview Country Club c/o LH Treatment Co LLC Attn: Manager or Superintendent 134 Prater Drive Georgetown, KY 40324

AI Name: L H Treatment Company LLC AI ID: 8083 Activity ID: ENV20180002

County: Scott

Permit Number: #1173

Date(s) Violation(s) Observed: 03/30/2018

This is to advise that you are in violation of the provisions cited below:

Violation Description for Subject Item AIOO0000008083():
The permittee shall report recorded daily water withdrawals to the Division: Due monthly, by the 15th of the month. This data shall be reported for each operation under this authorization. [401 KAR 4:010 Section 3, KRS 151.160]

Description of Non Compliance:

L H Treatment Company LLC has failed to regularly submit monthly reports for Water Withdrawal Permits: #1173 over the past 6 years (2012-2017). All permitted facilities are required to submit monitoring results submittal forms and water withdrawal report forms every month per regulatory requirements (401 KAR 4:010 Section 3).

The remedial measure(s), and date(s) to be completed by are as follows:

L H Treatment Company LLC shall submit past due monthly monitoring results submittal forms and water withdrawal report forms for compliance with their permits within 30 days <u>following</u> receipt of this Notice of Violation.

L H Treatment Company LLC shall continue to submit ongoing required monthly monitoring results submittal forms and water withdrawal report forms for compliance with their permits on **the 15th day of every month**. [401 KAR 4:010 Section 3]

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to \$25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their

deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Department for Environmental Protection
Division of Enforcement
300 Sower Boulevard, 3rd Floor
Frankfort, KY 40601
502-782-6855 (7:30 AM – 3:30 PM)

Email: Marlon.Bascombe@ky.gov Mr. Marlon Bascombe, Enforcement Specialist

Issued By:

Mr. Marlon A. Bascombe

Environmental Enforcement Specialist Compliance and Operations Branch

> E-Signed by Chloe_Brantley (? /ERIFY authenticity with e-Sign

E-Signed by Bascombe, Marlon ERIFY authenticity with eSign Deskto

Date: May 31, 2018

Issued By:

Ms. Chloe Brantley

Environmental Control Supervisor Water Quantity Management Section Department of Environmental Protection

Date: May 31, 2018

How Delivered: Certified Mail Certified/Registered: 7010 0290 0001 4823 0069

MATTHEW G. BEVIN
GOVERNOR



CHARLES G. SNAVELY
SECRETARY

ENERGY AND ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION

AARON B. KEATLEY

COMMISSIONER

300 SOWER BOULEVARD FRANKFORT, KENTUCKY 40601

April 26, 2018

Certified No. 7010 0290 0001 4823 4609

Longview Country Club Attn: Mr. William R. Pulliam III 3243 Frankfort Pike Georgetown, KY 40324

Re: Notice of Violation

AI ID: 8083

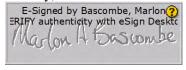
AI Name: Longview Country Club Activity ID: ENV20180002 Permit Number: #1173 Scott County, KY

Dear Mr. Pulliam III:

The Kentucky Department for Environmental Protection (DEP) has issued the enclosed Notice of Violation for violations discovered at your facility. Please review this Notice of Violation carefully to ensure that all remedial measures are completed by the specified deadlines.

If you have any questions, please contact Ms. Chloe Brantley at 502-782- 6898 or by email at Chloe.Brantley@ky.gov or myself at 502-782-6855 or by email at Marlon.Bascombe@ky.gov.

Sincerely,



Marlon Bascombe Environmental Enforcement Specialist Division of Enforcement

Enclosure



COMMONWEALTH OF KENTUCKY ENERGY and ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION Division of Enforcement

NOTICE OF VIOLATION

To: Longview Country Club Attn: Mr. William R. Pulliam III 98 Buena Vista Dr Frankfort, KY 40601

AI Name: Longview Country Club AI ID: 8083 Activity ID: ENV20180002

County: Scott

Permit Number: #1173

Date(s) Violation(s) Observed: 03/30/2018

This is to advise that you are in violation of the provisions cited below:

Violation Description for Subject Item AIOO0000008083():
The permittee shall report recorded daily water withdrawals to the Division: Due monthly, by the 15th of the month. This data shall be reported for each operation under this authorization. [401]

KAR 4:010 Section 3, KRS 151.160]

Description of Non Compliance:

Longview Country Club has failed to regularly submit monthly reports for Water Withdrawal Permits: #1173 over the past 6 years (2012-2017). All permitted facilities are required to submit monitoring results submittal forms and water withdrawal report forms every month per regulatory requirements (401 KAR 4:010 Section 3).

The remedial measure(s), and date(s) to be completed by are as follows:

Longview Country Club shall submit past due monthly monitoring results submittal forms and water withdrawal report forms for compliance with their permits within 30 days <u>following</u> receipt of this Notice of Violation.

Longview Country Club shall continue to submit ongoing required monthly monitoring results submittal forms and water withdrawal report forms for compliance with their permits on **the 15th day of every month**. [401 KAR 4:010 Section 3]

Page 1956 of 2110

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to \$25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Department for Environmental Protection
Division of Enforcement
300 Sower Boulevard, 3rd Floor
Frankfort, KY 40601
502-782-6855 (7:30 AM – 3:30 PM)

Email: Marlon.Bascombe@ky.gov Mr. Marlon Bascombe, Enforcement Specialist

E-Signed by Bascombe, Marlong ERIFY authenticity with eSign Deskto

Issued By:

Mr. Marlon A. Bascombe

Environmental Enforcement Specialist Compliance and Operations Branch

Date: April 26, 2018

E-Signed by Chloe_Brantley ()
VERIFY authenticity with e-Sign

Issued By:

Ms. Chloe Brantley Environmental Control Supervisor Water Quantity Management Section Department of Environmental Protection

Date: April 26, 2018

How Delivered: Certified Mail Certified/Registered: 7010 0290 0001 4823 4609

MATTHEW G. BEVIN
GOVERNOR



CHARLES G. SNAVELY
SECRETARY

ENERGY AND ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION

AARON B. KEATLEY

COMMISSIONER

300 SOWER BOULEVARD FRANKFORT, KENTUCKY 40601

May 23, 2018

Certified No. 7017 0530 0000 5314 4831

LH Treatment Co LLC Kevin Hammond 134 Prater Dr Georgetown, KY 40324

Re: Notice of Violation

AI ID: 8083

AI Name: Longview Country Club Activity ID: ENV20180003 Facility No. KY0081591 Scott County, KY

Dear Mr. Hammond:

The Kentucky Department for Environmental Protection (DEP) has issued the enclosed Notice of Violation for violations discovered at your facility. Please review this Notice of Violation carefully to ensure that all remedial measures are completed by the specified deadlines.

Your cooperation and attention to this matter is appreciated. If you have any questions, please contact me at (502) 782-6859.

Sincerely,

Donald Polly, Enforcement Specialist Compliance and Operations Branch

Enclosure



COMMONWEALTH OF KENTUCKY ENERGY and ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION Division of Enforcement

NOTICE OF VIOLATION

To: LH Treatment Co LLC Kevin Hammond 134 Prater Dr Georgetown, KY 40324

AI Name: Longview Country Club AI ID: 8083 Activity ID: ENV20180003

County: Scott

Enforcement Case ID: DOW180005 Facility Number: KY0081591

Date(s) Violation(s) Observed: 05/23/2018

This is to advise that you are in violation of the provisions cited below:

1 Violation Description for Subject Item AIOO0000008083():

No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 401 KAR 5:065, which cites 40 CFR 122.41(a), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, Outfall 001-1, for Total Suspended Solids (TSS) during the months of December 2017; and January and February 2018. The permitted limits for TSS Loading are a monthly average of 25 lbs/day and a maximum weekly average of 37.5 lbs/day. The reported results were a maximum weekly average of 48.44 lbs/day for December 2017; a monthly average of 28.24 lbs/day and a maximum weekly average of 80.89 lbs/day for January 2018; and a maximum weekly average of 62.38 lbs/day for February 2018. The permitted limits for TSS Concentration are a monthly average of 30 mg/l and a maximum weekly average of 45 mg/l. The reported results were a monthly average of 44 mg/l and a maximum weekly average of 121 mg/l for December 2017; a monthly average of 56 mg/l and a maximum weekly average of 159 mg/l for January 2018; and a maximum weekly average of 68 mg/l for February 2018.

The remedial measure(s), and date(s) to be completed by are as follows:

LH Treatment Co LLC shall comply with the terms and conditions of KPDES permit #KY0081591. The KDEP will continue to monitor your DMRs. [KRS 224.70-110]

2 Violation Description for Subject Item AIOO0000008083():

No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 401 KAR 5:065, which cites 40 CFR 122.41(a), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, Outfall 001-1, for Total Residual Chlorine (TRC) during the months of December 2017; and February 2018. The permitted limits for TRC Concentration are a monthly average of 0.011 mg/l and a maximum weekly average of 0.019 mg/l. The reported results were a maximum weekly average of 0.02 mg/l for December 2017; and a monthly average of 0.11 mg/l and a maximum weekly average of 0.44 mg/l for February 2018.

The remedial measure(s), and date(s) to be completed by are as follows:

LH Treatment Co LLC shall comply with the terms and conditions of KPDES permit #KY0081591. The KDEP will continue to monitor your DMRs. [KRS 224.70-110]

3 Violation Description for Subject Item AIOO0000008083():

No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the rules, regulations, permits, or orders of the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 401 KAR 5:065, which cites 40 CFR 122.41(a), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, Outfall 001-1, for Dissolved Oxygen (DO) during the month of February 2018. The permitted limit for DO Concentration is a minimum of 7 mg/l. The reported result was a minimum of 5.2 mg/l.

The remedial measure(s), and date(s) to be completed by are as follows:

LH Treatment Co LLC shall comply with the terms and conditions of KPDES permit #KY0081591. The KDEP will continue to monitor your DMRs. [KRS 224.70-110]

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to \$25,000 per day per violation depending on the statutes/regulations

violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Department for Environmental Protection
Division of Enforcement
300 Sower Blvd, 3rd Floor
Frankfort, KY 40601
502-782-6859 (7:45 AM – 3:45 PM)
Donald Polly, Enforcement Specialist

Issued By:

Donald Polly

Environmental Enforcement Specialist Compliance and Operations Branch

Date: May 23, 2018

How Delivered: Certified Mail Certified/Registered # 7017 0530 0000 5314 4831

MATTHEW G. BEVIN
GOVERNOR



CHARLES G. SNAVELY
SECRETARY

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

ANTHONY R. HATTON

300 Sower Boulevard Frankfort, Kentucky 40601

June 12, 2018

Certified No. 7010 0290 0001 4823 0267

Longview Golf Club, LLC Attention: Luther Conley 3243 Frankfort Road Georgetown, KY 40324

Re:

Notice of Violation AI ID: 8083

AI Name: Longivew Country Club Activity ID: ENV20180002 Water Withdrawal Permit: #1173

Scott County, KY

Dear Mr. Conley:

The Kentucky Department for Environmental Protection (DEP) has issued the enclosed Notice of Violation for violations discovered at your facility. Please review this Notice of Violation carefully to ensure that all remedial measures are completed by the specified deadlines.

Failure to comply with all remedial measures could result in enforcement action and the assessment of penalties. If you have any questions regarding the water withdrawal program and instructions on submitting the missing reports, please contact Ms. Chloe Brantley at 502-782-6898 or by email at Chloe.Brantley@ky.gov. If you have questions regarding enforcement procedures please contact myself at 502-782-6855 or by email at Marlon.Bascombe@ky.gov.

Sincerely,

Marlon Bascombe

Environmental Enforcement Specialist

Marlon A Bascombe

Division of Enforcement

Enclosure



Page 1962 of 2110

COMMONWEALTH OF KENTUCKY **ENERGY and ENVIRONMENT CABINET** DEPARTMENT FOR ENVIRONMENTAL PROTECTION **Division of Enforcement**

NOTICE OF VIOLATION

To: Longview Golf Club, LLC Attention: Luther Conley 3243 Frankfort Road Georgetown, KY 40324

AI Name: Longview Country Club

AI ID: 8083

Activity ID: ENV20180002

County: Scott

Permit Number: #1173

Date(s) Violation(s) Observed: 03/30/2018

This is to advise that you are in violation of the provisions cited below:

1 Violation Description for Subject Item AIOO0000008083(): The permittee shall report recorded daily water withdrawals to the Division: Due monthly, by the 15th of the month. This data shall be reported for each operation under this authorization. [401 KAR 4:010 Section 3, KRS 151.160]

Description of Non Compliance:

Longview Golf Club has failed to regularly submit monthly reports for Water Withdrawal Permits: #1173 over the past 6 years (2012-2017). All permitted facilities are required to submit monitoring results submittal forms and water withdrawal report forms every month per regulatory requirements (401 KAR 4:010 Section 3).

The remedial measure(s), and date(s) to be completed by are as follows:

Longview Golf Club shall submit past due monthly monitoring results submittal forms and water withdrawal report forms for compliance with their permits within 30 days following receipt of this Notice of Violation.

Longview Golf Club shall continue to submit ongoing required monthly monitoring results submittal forms and water withdrawal report forms for compliance with their permits on the 15th day of every month. [401 KAR 4:010 Section 3]

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to \$25,000 per day per violation depending on the statutes/regulations

	Permit #
	Company Name: Longview Golf Club
11	Address: 3243 Frankfort Pike
	GeorgeTown, KY 40324
	Signature of Preparer Luthe Conley
,	This report should be submitted within 15 days following the end of each calendar quarter
	to: Kentucky River Authority
	627 Wilkinson Blvd.
	Frankfort, Ky. 40601

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Case No. 2022-00432
Bluegrass Water's Response to OAG 1-34
Exhibit OAG 1-34
Page 1964 of 2110

Permit #	
Company Name: Longview Golf Club	
Address: 3243 Frankfort Pike	
GeorgeTOWN, KY 40324	
Signature of Preparer: Crufy	
This report should be submitted within 15 days following the end of each calendar quarter	
to: Kentucky River Authority	
627 Wilkinson Phys	

627 Wilkinson Blvd. Frankfort, Ky. 40601

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Permit #
Company Name: Longview Golf Club
Address: 3243 Frankfort Pike
GeorgeTOWN, KY 40324
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Signature of Preparer: with Contry
This report should be submitted within 15 days following the end of each calendar quarter
to: Kentucky River Authority
627 Wilkinson Blvd.
Frankfort, Ky. 40601

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	Permit #
	Company Name: Longview Golf Club
**	Address: 3243 Frankfart Pike
	GeorgeTOWN, KY 40324
	Signature of Preparet with Config
	This report should be submitted within 15 days following the end of each calendar quarter
	This report should be submitted within 15 days following the end of each calendar quarter to: Kentucky River Authority
	627 Wilkinson Blvd.
	Frankfort, Ky. 40601

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Permit #
Company Name: Longview Golf Club
 Address: 3243 Frankfart Pike
GeorgeTOWN, KY 40324
Signature of Preparer Juth Conly
This report should be submitted within 15 days following the end of each calendar quarter
to: Kentucky River Authority
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627 Wilkinson Blvd. Frankfort, Ky. 40601

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Permit #
Company Name: Longview Golf Club
 Address: 3243 Frankfact Pika
GEORGETOWN, KY 40324
Signature of Preparer: Yuth Couly
This report should be submitted within 15 days following the end of each calendar quarter
to: Kentucky River Authority
627 Wilkinson Blvd.
Frankfort, Ky. 40601

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Permit #
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GeorgeTONN, KY 40324
Signature of Preparet Suth Couly
This report should be submitted within 15 days following the end of each calendar quarter
to: Kentucky River Authority
627 Wilkinson Blvd.
Employ Ky 40601

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*Monthly Total

*Daily Average
No. of Days Water

Permit #
Company Name: Longview Golf Club Address: 3243 Fronkfort Pike
GeorgeTOWN, KY 40324
Signature of Preparer: Wath Confin
This report should be submitted within 15 days following the end of each calendar quarter
to: Kentucky River Authority
627 Wilkinson Blvd.
Frankfort, Ky. 40601

Month/ Year	Month/ Year	Month/ Year
Apr /2016	May /2016	JUN/ 2016
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Total		7
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ays Water		

Case No. 2022-00432
Bluegrass Water's Response to OAG 1-34
Exhibit OAG 1-34
Page 1971 of 2110

	Permit #	
	Company Name: Longview Golf Club	
	Address: 3243 Frankfort Pike	11
	Georgetown, KY 40324	
		7
+	Signature of Preparer:	

This report should be submitted within 15 days following the end of each calendar quarter to: Kentucky River Authority
627 Wilkinson Blvd.

Frankfort, Ky. 40601

	Month/ Year	Month/ Year	Month/ Year
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No. of Days Wa	ater		100 g

WATER USE KEPUKTING FUKIN

		TEATLE COL ICE OF	CTING TOTAL	
	Permit #	1173		
	Company Name: Lo	Jaview Golf	Club	
114	Address: 3243	Frankfort	Pike	9
	George	ETOWN, KY	40324	
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	Signature of Preparer:		uly	
	This report should be sub	orhitted within 15 days fo	ollowing the end of ea	ach calendar quarter
		to: Kentucky Rive	-	
		627 Wilkinson		
		Frankfort, k	(y. 40601	
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No. of Day	∕s Water Í			200

No. of Days Water Withdrawn/Pumped

Permit #
Company Name: Longview Golf Club
Address: 3243 Frankfort Pike
GeorgeTONN, KY 40324
Signature of Preparer: Config
This report should be submitted within 15 days following the end of each calendar quarter to: Kentucky River Authority 627 Wilkinson Blvd.
Frankfort Ky 40601

		Month/ Year	Month/ Year	Month/ Year
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No. of Days Water				4

	Permit #
	Company Name: Longrich Golf Club
	Address: 3243 Frankfort Pika
	GeorgeTOWN, KY 40324
	Signature of Preparer:
	This report should be submitted within 15 days following the end of each calendar quarter
·	to: Kentucky River Authority
	627 Wilkinson Blvd.

Frankfort, Ky. 40601

		Month/Year	Month/ Year	Month/ Year
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	Company Name: Lowg View Golf Club	
+	Address: 3243 Frankfort Pike	
	GeorgeTOWN, KY 40324	
	Signature of Preparers with Config. This proof should be submitted within 15 days following the end of each calendar quarter.	

This report should be submitted within 15 days following the end of each calendar quarter to: Kentucky River Authority
627 Wilkinson Blvd.

Frankfort, Ky. 40601

		Month/ Year	Month/ Year	Month/ Year
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*Daily Av	erage i			

No. of Days Water Withdrawn/Pumped

	Permit #
	Company Name: Longview Golf Club
	Address: 3243/ Frankfort Pike
	GeorgeTown, KY 40324
14	
	Signature of Preparer: Config
	This report should be submitted within 15 days following the end of each calendar quarter
	to: Kentucky River Authority
	627 Wilkinson Blvd.
	Frankfort, Ky. 40601

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Case No. 2022-00432
Bluegrass Water's Response to OAG 1-34
Exhibit OAG 1-34
Page 1977 of 2110

	Permit #	173	1		
	Company Name: 2049			1.7	_
	Address: 3243	Frankfort	Piko		
	GEOMET	OWN, KY	4032	4	
	(a) (a) (b)	,			
÷	Signature of Preparer:	uth Co	ruly		
•	This report should be submitted	to: Kentucky Rive	er Authority	nd of each calend	ar quarter
		627 Wilkinson Frankfort, ł			
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y Average			77
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	Permit #
	Company Name: Lowqview Gott Club
	Address: 3243 Frankfort Pika
	GeorgeTOWN, KY 40324
1	
	Signature of Preparer: Wath Couly
	This report should be submitted within 15 days following the end of each calendar quarter
	to: Kentucky River Authority
	627 Wilkinson Blvd

627 Wilkinson Blvd. Frankfort, Ky. 40601

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Permit #	
Company Name: Longview Golf Club	
Address: 3243 Frankfact P: Ke	
GeorgeTOWN, KY 40324	
Signature of Preparer:	
This report should be submitted within 15 days following the end of each calendar quarter	
to: Kentucky River Authority	

This report should be submitted within 15 days following the end to: Kentucky River Authority 627 Wilkinson Blvd. Frankfort, Ky. 40601

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Permit #
Company Name: Longview Golf Club
Address: 3243 Frankfact Pike
GeorgeTOWN, KY 40324
Signature of Preparer: Suff Couly
This report should be submitted within 15 days following the end of each calendar quarter
to: Kentucky River Authority
627 Wilkinson Bivd.
Frankfort, Ky. 40601

	Month/ Year	Month/ Year	Month/ Year Dec / 2014
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	Permit #	
	Company Name: Lowgview Golf Club	
* * * * * * * * * * * * * * * * * * * *	- Address: 3243 Frankfort Pike	
	Georgerows, KY 40324	
	Signature of Preparer: Yuth Conly	
	This report should be submitted within 15 days following the end of each calendar quarter	
	to: Kentucky River Authority	

to: Kentucky River Authority 627 Wilkinson Blvd. Frankfort, Ky. 40601

		Month/ Year	Month/ Year	Month/ Year
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Permit #	
Company Name: Longriew Gelf Club	
Address: 3243 Frankfort Pike	
GeorgeTOWN, KY 40324	
Signature of Preparer: Yuth Conly	
This report should be submitted within 15 days following the end of each calendar quarter	

This report should be submitted within 15 days following the end of each calendar q to: Kentucky River Authority 627 Wilkinson Blvd.

Frankfort, Ky. 40601

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No. of Days Water Withdrawn/Pumped

	Permit #
	Company Name: Longview Golf Club
-	Address: 3243 Frankfort Piko
	GeorgeTOWN, KY 40324
	Signature of Preparer: Yuth Config
	This report should be submitted within 15 days following the end of each calendar quarter
	to: Kentucky River Authority
	627 Wilkinson Blvd

627 Wilkinson Blvd. Frankfort, Ky. 40601

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	Permit #
4	Company Name: Longview Golf Club Address: 3243 Frankfort Pike
<u> </u>	GeorgeTOWN, KY 40324
	Signature of Preparer: Yuth Couly
	This report should be submitted within 15 days following the end of each calendar quarter to: Kentucky River Authority
	627 Wilkinson Blvd. Frankfort, Ky. 40601
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Permit #	1173			
Company Name: Los	Frankfac		3	
George	OTOWN,	K4 40	324	*
Signature of Preparer: This report should be subr	mitted within 15 d	ays following the	e end of each cal	— endar quarter
	to: Kentucky 627 Wilk	River Authority inson Blvd. fort, Ky. 40601		

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Permit #	
Company Name: Longview Golf Club	
 Address: 3243 Frankfort Pike	The state of the s
GEORGETOWN, KY 40324	_
Signature of Preparer: Yuth Conly	
This report should be submitted within 15 days following the end of each cale	ndar quarter
4- Vestualer Diver Authority	

This report should be submitted within 15 days following the end of to: Kentucky River Authority 627 Wilkinson Blvd.

Frankfort, Ky. 40601

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nthly 7		-		
ly Ave	∘rage ∕s Water	11.51		

Withdrawn/Pumped

WATER USE REPURTING FURIN

	Permit #
	Company Name: Longriew Golf Club
	Address: 3243 Frankfast Pika
	GEOGGETOWN, KY 40324
+:	
	Signature of Preparer: Coul-
	This report should be submitted within 15 days following the end of each calendar quarter
	to: Kentucky River Authority
	627 Wilkinson Blvd.
	Frankfort, Ky. 40601

	Month/ Year	Month/ Year	Month/Year
ENDIVE	July/2012	Aug / 2012	Sep /2012
1	.03	.03	.03
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3	. 03	0	0
4	.03	0	.03
5	.03	.03	0
6	.03	. 03	.03
7	.03	03	.03
8	. 03	.03	0
9	.03	0	0
10	.03	. 03	.03
11	.03	. 03	.03
12	0	.03	.03
13	0	.03	.03
14	0	.03	.03
15	0	.03	.03
16	0	. 03	.03
17	.03	.03	0
18	0	.03	0
19	0	.03	0
20	.03	-03	.03
21	. 03	.03	.03
22	.03	.03	.03
23	.03	.03	.03
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26	0	.03	0
27	0	.03	0
28	0	.03	0
29	.03	.03	0
30	.03	. 03	.03
31	.03	.03	
iy Total		-	
Average			
Days Water			

Case No. 2022-00432
Bluegrass Water's Response to OAG 1-34
Exhibit OAG 1-34
Page 1988 of 2110

WATER USE REPURING FURIN

Permit #
Company Name: Longview Golf Club
 Address: 3243 Frankfort Pike
 GeorgeTOWN, KY 40324
Signature of Preparer: Vulle Config
 This report should be submitted within 15 days following the end of each calendar quarter
to: Kentucky River Authority
627 Wilkinson Blvd.
Frankfort, Kv. 40601

Part of the second	Month/ Year	Month/ Year	Month/ Year
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nly Total	-		
Average			
Days Water			

Case No. 2022-00432
Bluegrass Water's Response to OAG 1-34
Exhibit OAG 1-34
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Longview Country Club Josiah Cox 500 Northwest Plaza Dr Ste 500 Saint Ann, MO 63074

COMMONWEALTH OF KENTUCKY ENERGY and ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION Division of Enforcement

NOTICE OF VIOLATION

To: Longview Country Club Josiah Cox 500 Northwest Plaza Dr Ste 500

Saint Ann, MO 63074

AI Name: Longview Country Club AI ID: 8083 Activity ID: ENV20190002

County: Scott

Enforcement Case ID:

Date(s) Violation(s) Observed: 09/27/2019

This is to advise that you are in violation of the provisions cited below:

1 Violation Description for Subject Item AIOO0000008083():

No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the rules, regulations, permits, or orders of the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 40 CFR 122.41(a), as adopted by 401 KAR 5:065, Section 2(1), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, monitoring point 001-1, for E. Coli. The permitted limit for E. Coli is concentration 7-day geometric, less than or equal to 240 MPN/100 mL. The facility reported the following: concentration 7-day geometric 659 MPN/100 mL for January 2019.

The remedial measure(s), and date(s) to be completed by are as follows:

The permittee shall comply with the terms and conditions of the KPDES Permit. [KRS 224.70-110]

2 Violation Description for Subject Item AIOO0000008083():

No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the rules, regulations, permits, or orders of the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 40 CFR 122.41(a), as adopted by 401 KAR 5:065, Section 2(1), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, monitoring point 001-1, for Dissolved Oxygen. The permitted limit for Dissolved Oxygen is concentration instantaneous min., greater than or equal to 7 mg/L. The facility reported the following: concentration instantaneous min. 6.8 mg/L for May 2019.

The remedial measure(s), and date(s) to be completed by are as follows:

The permittee shall comply with the terms and conditions of the KPDES Permit. [KRS 224.70-110]

3 Violation Description for Subject Item AIOO0000008083():

No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the rules, regulations, permits, or orders of the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 40 CFR 122.41(a), as adopted by 401 KAR 5:065, Section 2(1), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is loading weekly avg., less than or equal to 37.5 lbs/day. The facility reported the following: loading weekly avg. 39.19 lbs/day for February 2019.

The remedial measure(s), and date(s) to be completed by are as follows:

The permittee shall comply with the terms and conditions of the KPDES Permit. [KRS 224.70-110]

4 Violation Description for Subject Item AIOO0000008083():

No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the rules, regulations, permits, or orders of the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 40 CFR 122.41(a), as adopted by 401 KAR 5:065, Section 2(1), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, monitoring point 001-1, for CBOD. The permitted limit for CBOD is loading weekly avg., less than or equal to 37.53 lbs/day; and concentration weekly avg., less than or equal to 45 mg/L. The facility reported the following: loading weekly avg. 70.97 lbs/day; and concentration weekly avg. 67 mg/L for February 2019.

The remedial measure(s), and date(s) to be completed by are as follows:

The permittee shall comply with the terms and conditions of the KPDES Permit. [KRS 224.70-110]

5 Violation Description for Subject Item AIOO0000008083():

No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the rules, regulations, permits, or orders of the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 40 CFR 122.41(a), as adopted by 401 KAR 5:065, Section 2(1), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, monitoring point 001-1, for E. Coli. The permitted limit for E. Coli is concentration 7-day geometric, less than or equal to 240 MPN/100 mL. The facility reported the following: concentration 7-day geometric 870 MPN/100 mL for March 2019.

The remedial measure(s), and date(s) to be completed by are as follows:

The permittee shall comply with the terms and conditions of the KPDES Permit. [KRS 224.70-110]

AI: Longview Country Club -- 8083

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to \$25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Department for Environmental Protection Division of Enforcement 300 Sower Blvd Frankfort, KY 40601 502-782-6859 (8:00 AM – 4:30 PM)

Issued By:

Michael B. Kroeger, Director Date: December 19, 2019





MATTHEW G. BEVIN GOVERNOR

ENERGY AND ENVIRONMENT CABINET

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
300 SOWER BOULEVARD
FRANKFORT, KENTUCKY 40601
www.kentucky.gov

MEMORANDUM

TO: Marlon Bascombe

Division of Enforcement

THRU: Chloe Brantley, Supervisor

Water Quantity Management Section Watershed Management Branch

FROM: Rita Hockensmith

Water Quantity Management Section

DATE: July 18, 2018

SUBJECT: Longview Country Club (AI 8083)

Water Withdrawal Compliance

Scott County

Longview Country Club has submitted all missing monthly water withdrawal reports for permit #1173. They are now in compliance with 401 KAR 4:010 Section 3.

Should you have any questions or require any additional information please feel free to contact me at (502) 782-6975.



Andy Beshear Governor

Rebecca W. Goodman Secretary Energy and Environment Cabinet



Commonwealth of Kentucky

Public Service Commission
211 Sower Blvd.
P.O. Box 615

Frankfort, Kentucky 40602-0615

Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Kent A. Chandler Chairman

Mary Pat Regan Commissioner

July 29, 2022

Josiah Cox CEO Central States Water Resources 1630 Des Peres Rd., Suite 140 Des Peres, MO 63131

Re: Periodic Wastewater Inspection

Bluegrass Water Utility Operating Company, LLC - Lake Columbia Wastewater

System

Bullitt County, KY

Dear Mr. Cox:

Public Service Commission staff performed a periodic inspection of the Bluegrass Water Utility Operating Company, LLC – Lake Columbia wastewater system located in Bullitt County, KY on April 27, 2022, reviewing utility operations and management practices pursuant to Commission regulations. The report of this inspection is enclosed with this letter.

Based on the inspector's observations, no deficiencies were noted during this inspection.

Please review the enclosed inspection report in its entirety as you will find further information noted regarding the inspection. If you have any questions regarding this inspection, feel free to contact me at 502-330-5986 or via email at Brian.Rice@ky.gov.

Sincerely, Bin J. Rien

Brian L. Rice Utility Inspector

Public Service Commission

Enclosure(s)

Copy: Aaron Silas, Regulatory Case Manager

Jake Freeman, Director of Engineering, Central States Water Resources

Terry Merritt, VP of Midwest Water Operations

1351 Jefferson Street, Suite 301

Washington, MO 63090



Periodic Compliance Inspection

Utility: Bluegrass Water Utility Operating Company, LLC -	Lake Columb	<u>oia</u>	
Utility's Principal office location: 1630 Des Peres Road,	Suite 140 St	Louis, MO 63	3131
Utility representative during inspection: Jake Freeman,	Arthur Faiello	and Aaron S	Silas
Counties served: Bullitt			
Customers: 32			
Investigator: Brian L. Rice			
Date(s) of inspection: April 27, 2022			
Date(s) of last inspection: April 20, 2021			
Deficiencies noted during the last inspection: No deficiencies	encies noted	during this in:	spection
Have deficiencies been corrected since last inspection	? Yes □	No 🗌	N/A 🖂
If no, provide a response as to why these deficiencies	have not bee	en addressed	i.
General Questions			
Treatment Facility: Collection System:	Yes ⊠ Yes ⊠	No 🗌 No 🔲	N/A 🗌 N/A 🗍
<u>Utility Information</u>			
Total number of Employees: 0 Number of Office Employees: 0			
Note: The Company is comprised of contracted operations	s, billing, and	customer ser	vice.
Does the utility have its own maintenance staff?	Yes 🗌	No ⊠ N/	4 🗌
If not, give the name the person(s) doing the work:			
Operation and Maintenance is contracted out to Midwest V	Vater Operation	ons.	
Bluegrass Water Utility Company, LLC – Lake Columbia		Pa	age 1

Periodic Compliance Inspection

807 KAR 5:006 (General Rules)

<u>Section 2:</u> General Provisions. Reference to standards or codes in 807 KAR Chapter 5 shall not prohibit a utility from continuing or initiating experimental work and installations to improve, decrease the cost of, or increase the safety of its service.

Section 4: Reports					
Has the utility filed its gross annual operating revenue r	eport?	•			
	Yes	\boxtimes	No 🗌	N/A 🗌	
Section 7: Billings, Meter Readings, and Information.					
Is the Billing and Collection handled by the Utility?	Yes		No 🖂	N/A 🗌	
If no, then who? Billing and Collection is handled by Nitro	Billing	Services	<u>5.</u>		
Does each bill for utility service issued periodically by a	utility	clearly	show the fo	llowing?	
The date the bill was issued: Class of service: Present and last preceding meter readings: Date of the present reading: Number of units consumed: Net amount for service rendered: All taxes: Adjustments, if applicable: The gross amount of the bill: The date after which a penalty may apply to the gross of the bill is estimated or calculated: Is the rate schedule under which the bill is computer maintains a Web site)?	Yes Yes	⊠ □ □ □ unt: □ ted on	No	N/A	
Note: Yes, the tariff (including the rate schedule) is found on the Company website. Additionally, no readings/units/etc. are included due to the nature of the flat rates charged.					
Also furnished by one (1) of the following methods, by:					
Printing it on the bill: Publishing it in a newspaper of general circulation or			No 🗌 :	N/A 🗌	

Bluegrass Water Utility Company, LLC - Lake Columbia

Mailing it to each customer once each year; or: Yes No N/A Yes No N/A Provide a place on each bill for a customer to indicate the customer's desire for a copy of the applicable rates: No N/A No N/A No N/A No N/A No N/A Note: Due to the nature of the bills, the flat rate found on the bill is the rate schedule associated with the service areas. Additionally, the bills have multiple options for contacting the Utility if they have any
Provide a place on each bill for a customer to indicate the customer's desire for a copy of the applicable rates: Note: Due to the nature of the bills, the flat rate found on the bill is the rate schedule associated with
the applicable rates: Yes No No N/A Note: Due to the nature of the bills, the flat rate found on the bill is the rate schedule associated with
billing inquiries including questions regarding the rate schedule.
Section 8. Deposits.
Is the utility requiring a minimum cash deposit or other guarantee from customers to secure payment of bills? Yes No N/A
Section 10: Customer Complaints to the Utility
Upon complaint to a utility by a customer at the utility's office, by telephone or in writing, does the utility make a prompt and complete investigation and advise the customer of the utility's findings? Yes \boxtimes No \square N/A \square
Does the utility keep a record of all written complaints concerning the utility's service?
Yes No NA □ Does the record include the following? The customer's name and address: The date and nature of the complaint: The disposition of the complaint: Yes No NA □ N/A □ N/A □
Does the utility maintain these records for two (2) years from the date of resolution of the complaint?
If a written complaint or a complaint made in person at the utility's office is not resolved, does the utility provide written notice to the customer of his or her right to file a complaint with the commission? Yes \square No \square N/A \boxtimes
Note: The Company does not maintain a local office, but this information is available via the Company's website. In the Order associated with Docket 2019-00104, the Commission approved Bluegrass' operations without a local office.
Does the utility provide the customer with the mailing address, Web site address, and telephone
number of the commission? Yes No N/A
Bluegrass Water Utility Company, LLC – Lake Columbia Page 3

Periodic Compliance Inspection

Note: The Company does not maintain a local office bucustomer questions and provide the Commissions mailing number and provides this information on the utility's websited.	g address, w			
If a telephonic complaint is not resolved, does the u customer of his or her right to file a complaint with the	commissio		al notice to the	
	Yes ⊠	NO [N/A	
Section 14: Utility Customer Relations				
Does the utility post and maintain regular business hou to assist its customers and to respond to inquiries from complaints?				
Does the utility designate at least one (1) representa questions, resolve disputes, and negotiate partial payr				
	Yes 🗌	No 🗌	N/A 🖂	
Note: The Company does not maintain a local office, bucustomer questions, resolve disputes, and negotiate partia Order associated with Docket 2019-00104, the Commissio local office.	l payment pla	ns thru teleph	none only. In the	
If the utility has an annual operating revenue of \$25 designated representative available during the utility than seven (7) hours per day, five (5) days per week ex	's establishe	ed working h		
	Yes 🖂	No 🗌	N/A	
If the utility has an annual operating revenue of less than \$250,000, does the utility have a designated representative available during the utility's established working hours not fewer than seven (7) hours per day, one (1) day per week?				
man cover (v, means per aug, ene (v, aug per meen	Yes 🗌	No 🗌	N/A 🖂	
Does the utility provide the following?				
Maintain a telephone:	Yes 🛚	No 🗌	N/A	
Publish the telephone number in all service areas:	Yes 🖂	No 🗌	N/A	
Note: The number is available on the website and custome	er bills.			

Bluegrass Water Utility Company, LLC - Lake Columbia

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Permit all customers to contact the utility's designated representative without charge:					
	Yes 🛚	No 🗌	N/A		
Does the utility prominently display in each office open shall post on its Web site, if it maintains a Web site) a scommission, of the customer's rights pursuant to administrative regulation?	ummary, p	repared and	provided by the		
Note: The Company does not maintain a local office, but this website. In the Order associated with Docket 2019-0010-operations without a local office. Records are kept electroreasonable notice at reasonable hours.	4, the Con	nmission appr	oved Bluegrass'		
Section 20: Access to Property					
Do employees of the utility (whose duties require him to distinguishing uniform or other insignia, identifying the show a badge or other identification that shall identify the	em as an	employee of	the utility, and		
Section 23: System Maps and Records					
Does the utility have on file at its principal office locat request with the commission a map or maps of suitable or holds itself ready to serve?					
Note: In the Order associated with Docket 2019-00104 methodology of utilizing the Kentucky Infrastructure Author The Company does maintain maps electronically that can be Additionally, the Company utilizes the Kentucky Infrastructurincluding districts.	ity to comp e filed upor	oly with mapping request with	ng requirements. the Commission.		
Is the map or maps available in electronic format as database?	a PDF file Yes ⊠	e or as a dig No □	ital geographic N/A 🗌		
Is the following data available on the map or maps?					
Operating districts Rate districts: Communities served:	Yes ☐ Yes ☐ Yes ⊠	No 🗌 No 🗍 No 🗍	N/A ⊠ N/A ⊠ N/A □		

Periodic Compliance Inspection

Section 24: Location of Records.				
All records required by 807 KAR Chapter 5 shall be ke made available to representatives, agents, or staff of t at all reasonable hours.				
Are all records required by 807 KAR Chapter 5 kept in tavailable to representatives, agents, or staff of the correasonable hours?		i <u>on</u> upo		
In the Order associated with Docket 2019-00104, the Cowithout a local office. Records are kept electronically and notice at reasonable hours.				
Section 25: Safety Program:				
Each utility shall adopt and execute a safety program operations. At a minimum, the safety program shall: (1) Establish a safety manual with written guidelines for to be followed by utility employees. (2) Instruct employees in safe methods of performing the course of their world shock, asphyxiation, or drowning, in accepted methods	r safe v heir wo k, are s s of art	working ork. subject tificial r	practices a to the haza espiration.	nd procedures
Has the utility adopted and executed a safety program operations?	n, appro		to the size	and type of its N/A □
Note: Bluegrass Water contracts with Midwest Water wastewater treatment facility. Midwest Water Operations h				d maintain the
At a minimum, does the safety program include the following	lowing	?		
A safety manual with written guidelines for safe w followed by utility employees:	V/		ces and pro	ocedures to be N/A 🏻
Note: Bluegrass Water has no employees.				
Instruct employees in safe methods of performing their	r work. Yes		No 🗌	N/A ⊠
Note: Bluegrass Water has no employees. Bluegrass Water Utility Company, LLC – Lake Columbia			Pag	

Instruct employees who, in the course of their work, shock, asphyxiation, or drowning, in accepted method			
Note: Bluegrass Water has no employees.			
Section 26: Inspection of Systems:			
 (1) A utility shall adopt inspection procedures to assurutility's facilities and compliance with KRS Chapter 278 these procedures with the commission for review. (2) Upon receipt of a report of a potentially hazardous of shall inspect all portions of the system that are the subjection (3) Appropriate records shall be kept by a utility to identifie of inspection, the person conducting the inspection to correct the deficiencies. 	and 807 K condition a ect of the re tify the ins	AR Chapter 5 t a utility facil port. pection made	and shall file lity, the utility the date and
Has the utility adopted inspection procedures to assurutility's facilities and compliance with KRS Chapter 278 a			eration of the
Have these inspection procedures been filed with the co	mmission f Yes 🗌	or review? No ⊠	N/A 🗌
Upon receipt of a report of a potentially hazardous condinspect all portions of the system that are the subject of			oes the utility
Are appropriate records kept by a utility to identify the inspection, the person conducting the inspection, def correct the deficiencies?			
Section 27: Reporting of Accidents, Property Damage, or	Loss of Se	ervice.	
 (1) Within two (2) hours following discovery each utility notify the commission by telephone or electronic mail of in: (a) Death or shock or burn requiring medical treatmedicality, or any accident requiring inpatient overnight (b) Actual or potential property damage of \$25,000 or 	f a utility r ment at a l hospitaliza	elated accide nospital or si	nt that results
Bluegrass Water Utility Company, LLC - Lake Columbia		Page	7

Periodic Compliance Inspection

(c) Loss of service for four (4) or more hours to ten (customers, whichever is less.	(10) percent	or 500 or mo	re of the utility's	S
(2) A summary written report shall be submitted by th (7) calendar days of the utility related accident. For go of the commission, shall, upon application in writing, submission of this report.	ood cause sl	nown, the ex	ecutive directo	r
Has the Utility had any Accidents, Property Damage, o	r Loss of Se Yes 🗌	rvice? No ⊠	N/A	
f yes, was the Commission notified by telephone or discovery of a utility related accident that resulted in t			wo (2) hours o	f
Death, shock, or burn requiring medical treatment a any accident requiring inpatient overnight hospitali		or similar me	edical facility, o N/A ⊠	r
Actual or potential property damage of \$25,000 or n	nore: Yes □	No 🗌	N/A 🖂	
Loss of service for four (4) or more hours to ten (1 customers, whichever is less:	0) percent o	r 500 or mor No □	re of the utility's	S
Was a summary written report submitted by the ut calendar days of the utility related accident?	tility to the c	ommission	within seven (7	')
	Yes 🗌	No 🗌	N/A 🖂	
Section 28: Deviations from Administrative Regulation n special cases, for good cause shown, the commissical desirative regulation.	7)	nit deviation	s from this	
Has the utility been permitted by the commission to de regulations?	eviate from the	nese adminis No 🗌	strative N/A	
f so, provide the case no. Case No. 2019-00104.				
Ruggrass Water Hillity Company LLC - Lake Columbia		P:	ane 8	

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Periodic Compliance Inspection

807 KAR 5:011 (Tariffs)

Section 12: Posting tariffs, Administrative Regulation	ons, and Sta	tutes	
Does the utility display a suitable placard, in large type are available for public inspection?	e, that states Yes	that the utili	ty's tariff and statutes N/A ⊠
Note: The Company does not maintain a local office, but website. In the Order associated with Docket 2019-			
operations without a local office. Records are kept e reasonable notice at reasonable hours.	ectronically	and can be	made available upon
Does the utility provide a suitable table or desk in its may view all effective tariffs?	office or plac	e of busines	s on which the public
Note: The Company does not maintain a local office, bu			
website. In the Order associated with Docket 2019-			
operations without a local office. Records are kept e reasonable notice at reasonable hours.	ectronically	and can be	made available upon
Section 13: Special Contracts			
Does the utility have any special contracts that establi contained in its tariff?	ish rates, cha Yes	arges, or cor No ⊠	nditions of service not
If yes, has the utility filed the special contracts with the		No 🗌	N/A ⊠
807 KAR 5:071 (Sewage):		
Section 1: General.			
The purpose of this administrative regulation is regulations governing the service of sewage utilit Public Service Commission.			
Section 4: Information Available to Customers.			
(1) System maps or records. Each utility shall maint entire force main and collection systems, with sucl			
Bluegrass Water Utility Company LLC – Lake Columbia			Page 9

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Periodic Compliance Inspection

enable the utility to advise prospective customers the facilities available for serving any locality.	s, and others	entitled to th	ne information, as to
(2) Rates, rules, and regulations. A schedule of appeach class of customers and the approved rules available to any customer or prospective customer	and regulation	ons of the se	
Does the Utility have a current map and/or plans for its	system? Yes ⊠	No 🗌	N/A 🗌
Section 5. Quality of Service.			
(1) General. Each utility shall maintain and operate and properly equipped to collect, transport, and to degree of purity required by the health laws of the agencies, federal, state, and local, having jurisdictions.	reat sewage, le State of K	and discharç entucky, and	ge the effluent at the
(2) Limitations of service. No sewage disposal comor disposal any material except sewage as deregulation. In compliance with the administrative refforts to eliminate or prevent the entry of surfact industrial liquid waste into its sanitary sewer syst appropriate state, county, or municipal authorities relieve the utility of its responsibilities.	fined by Sec egulation, the se or ground em. A utility	ction 2(7) of e utility shall water, or an may request	this administrative make all reasonable y corrosive or toxic assistance from the
Is the utility in compliance with the Division of Water?	Yes 🗌	No 🖂	N/A 🗌
Note: The Company is under an Agreed Order with D	oivision of Wa	ter.	
Is the utility making every reasonable effort to eliminat or any corrosive or toxic industrial liquid waste into its			face or ground water,
	Yes 🗵	No 🗌	N/A 🗌
Section 6: Continuity of Service.			
(1) Emergency interruptions. Each utility shall ma interruptions of service and when such interruption service with the shortest possible delay consister public.	ons occur sh	all endeavor	to reestablish stomers and the
Bluegrass Water Utility Company, LLC - Lake Columbia			Page 10

Periodic Compliance Inspection

(2) Scheduled interruptions. Whenever any utility finds it necessary to schedule an

interruption of its service, it shall notify all custon the time and anticipated duration of the interrup interruptions shall be made at such hours as wi customers.	tion. Whene	ver possible,	scheduled	ating
(3) Record of interruptions. Each utility shall ke system. This record shall show the cause of intestaken to prevent recurrence.	•		•	
Is the utility making all reasonable efforts to p interruptions occur shall endeavor to reestab consistent with the safety of its customers and	lish service			
	Yes 🖂	No 🗌	N/A 🗌	
If the utility schedules an interruption of service the interruption?	e are all cust Yes ⊠	omers notifie No ⊡	ed that are affect	ed by
PROVIDE DOCUMENTATION DURING INSPECT	ION IF ANY.			
Does the utility make all reasonable efforts to provide least inconvenience to the customers?	schedule ir Yes 🏻	nterruptions a	at such hours a	s will
Does the utility maintain a record of all interrup	tions of serv Yes ⊠	rice regardinç No □	g the following it	ems?
Cause of interruption	Yes	No 🗔	N/A	
Date	Yes 🖂	No 🗔	N/A	
Time	Yes 🕅	No 🗍	N/A	
Duration	Yes 🕅	No 🗍	N/A	
Remedy	Yes 🖂	No 🗌	N/A 🔲	
# Of customers affected	Yes 🛛	No 🗌	N/A	
steps taken to prevent recurrence	Yes 🛛	No 🗌	N/A	

Section 7. Design, Construction, and Operation.

(1) General. The sewage treatment facilities of the sewage utility shall be constructed, installed, maintained and operated in accordance with accepted good engineering practice to assure, as far as reasonably possible, continuity of service, uniformity in the quality of service furnished, and the safety of persons and property.

- (2) Design and construction requirements. The design and construction of the sewage utility's collecting sewers, treatment plant and facilities, and all additions thereto and modifications thereof, shall conform to the requirements of the Kentucky Department for Natural Resources and Environmental Protection, Bureau of Environmental Quality, Division of Water Quality.
- (3) Adequacy of facilities. The capacity of the sewage utility's sewage treatment facilities for the collection, treatment and disposal of sewage and sewage effluent must be sufficiently sized to meet all normal demands for service and provide a reasonable reserve for emergencies.
- (4) Inspection of facilities. Each sewage utility shall adopt procedures for inspection of its sewage treatment facilities to assure safe and adequate operation of its facilities and compliance with commission rules. These procedures shall be filed with the commission. Unless otherwise authorized in writing by the commission, the sewage utility shall make inspections of collecting sewers and manholes on a scheduled basis at intervals not to exceed one (1) year, unless conditions warrant more frequent inspections and shall make inspections of all mechanical equipment daily. The sewage utility shall maintain a record of findings and corrective actions required, and/or taken, by location and date.

Is the utility operating and maintaining their facility is practice to assure, as far as reasonably possible, continuously furnished, and the safety of persons and property?	nuity c	of service		
Is the utility adhering to their inspection procedures facilities and compliance with the Commission rules?			afe and aded No	uate operation of its
Unless otherwise authorized in writing by the commiss their collecting sewers and manholes on a scheduled unless conditions warrant more frequent inspections? Does the utility inspect all mechanical equipment daily	d bas Yes ⁄?	is at into	ervals not to	exceed one (1) year, N/A
Note: This facility has a Mission-Manage SCADA mor	Yes nitorin	⊠ g syster	No	N/A [_]
Does the utility maintain a record of findings and correand date?	ective Yes	_	required, and	l/or taken, by location N/A ☐
Bluegrass Water Utility Company, LLC – Lake Columbia				Page 12

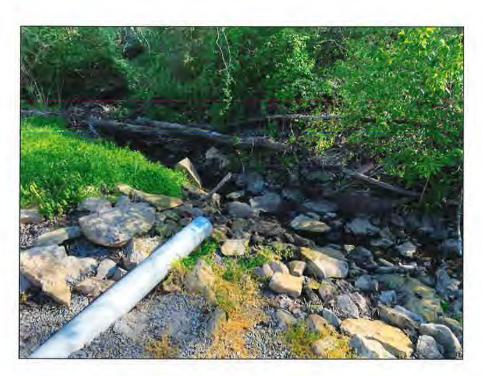


Lake Columbia





Chlorine Contact Basin



Effluent Discharge

Periodic Compliance Inspection

Comment: During this periodic regulatory compliance inspection, it was not possible to review/discuss every record relating to all Commission requirements. Therefore, in some instances the results contained in this report are indicative of those items inspected and reviewed on a sample basis.

Report by:

Brian L. Rice Utility Inspector

Bin J. Rin

Kentucky Public Service Commission

Date: July 27, 2022

COMMONWEALTH OF KENTUCKY **ENERGY and ENVIRONMENT CABINET** DEPARTMENT FOR ENVIRONMENTAL PROTECTION **Division of Enforcement**

NOTICE OF VIOLATION

To: LH WWTP Josiah Cox 500 Northwest Plaza Dr Ste 500

Saint Ann, MO 63074

AI Name: LH WWTP AI ID: 163895 Activity ID: ENV20200001

County: Scott

Enforcement Case ID:

Date(s) Violation(s) Observed: 05/14/2020

This is to advise that you are in violation of the provisions cited below:

Violation Description for Subject Item AIOO0000163895(): No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the rules, regulations, permits, or orders of the cabinet or in contravention of any of the provisions of this chapter. [KRS 224.70-110]

Description of Non Compliance:

Failing to comply with 40 CFR 122.41(a), as adopted by 401 KAR 5:065, Section 2(1), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, monitoring point 001-1, for Dissolved Oxygen. The permitted limit for Dissolved Oxygen is concentration instantaneous min., greater than or equal to 7 mg/L. The facility reported the following: concentration instantaneous min. 4 mg/L for March 2020.

The remedial measure(s), and date(s) to be completed by are as follows: The permittee shall comply with the terms and conditions of the KPDES Permit. [KRS 224.70-110] AI: LH WWTP -- 163895

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to \$25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Department for Environmental Protection
Division of Enforcement
300 Sower Blvd
Frankfort, KY 40601
502-782-6859 (8:00 AM – 4:30 PM)

Issued By:

Michael B. Kroeger, Assistant Director

Date: May 29, 2020

Andy Beshear Governor

Rebecca W. Goodman Secretary Energy and Environment Cabinet



Commonwealth of Kentucky

Public Service Commission
211 Sower Blvd.
P.O. Box 615

Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Kent A. Chandler Chairman

Mary Pat Regan Commissioner

July 29, 2022

Josiah Cox CEO Central States Water Resources 1630 Des Peres Road, Suite 140 Des Peres, MO 63131

Re: Periodic Wastewater Inspection

Bluegrass Water Utility Operating Company, LLC - LH Treatment Wastewater System

Scott County, KY

Dear Mr. Cox:

Public Service Commission staff performed a periodic inspection of the Bluegrass Water Utility Operating Company, LLC – LH Treatment Wastewater System located in Scott County, KY on April 27, 2022, reviewing utility operations and management practices pursuant to Commission regulations. The report of this inspection is enclosed with this letter.

Based on the inspector's observations, no deficiencies were identified.

Please review the enclosed inspection report in its entirety as you will find further information noted about the inspection. If you have any questions regarding this inspection, feel free to contact me at 502-330-5986 or via email at Brian.Rice@ky.gov.

Sincerely, Bin Z. Rie

Brian L. Rice Utility Inspector

Public Service Commission

Enclosure(s)

Copy: Aaron Silas, Regulatory Case Manager

Jake Freeman, Director of Engineering, Central States Water Resources

Terry Merritt, VP of Midwest Water Operations

1351 Jefferson Street, Suite 301

Washington, MO 63090



Periodic Compliance Inspection

Utility: Bluegrass Water Utility Operating Company, LLC –	LH Treatmer	<u>nt</u>	
Utility's Principal office location: 1630 Des Peres Road,	Suite 140 St	Louis, MO 60	<u>3131</u>
Utility representative during inspection: Jake Freeman,	Arthur Faielle	and Aaron S	<u>Silas</u>
Counties served: Scott			
Customers: <u>345</u>			
Investigator: <u>Brian L. Rice</u>			
Date(s) of inspection: April 27, 2022			
Date(s) of last inspection: April 19, 2021			
Deficiencies noted during the last inspection: No defici	encies noted	during this in	spection_
Have deficiencies been corrected since last inspection	2		
nave denciencies been corrected since last inspection	Yes 🗌	No 🗌	N/A 🖂
If no, provide a response as to why these deficiencies	have not bee	en addressed	d.
If no, provide a response as to why these deficiencies <u>General Questions</u>	have not bee	n addressed	i.
	have not bee Yes ⊠ Yes ⊠	n addressed No 🗌 No 🗍	N/A
General Questions Treatment Facility:	Yes ⊠	No 🗌	N/A <u></u>
General Questions Treatment Facility: Collection System: Utility Information Total number of Employees: 0	Yes ⊠ Yes ⊠	No 🗌 No 🗍	N/A N/A
General Questions Treatment Facility: Collection System: Utility Information Total number of Employees: 0 Number of Office Employees: 0	Yes ⊠ Yes ⊠	No	N/A N/A
General Questions Treatment Facility: Collection System: Utility Information Total number of Employees: 0 Number of Office Employees: 0 Note: The Company is comprised of contracted operations	Yes ⊠ Yes ⊠ s, billing, and w	No ☐ No ☐ customer ser	N/A N/A
General Questions Treatment Facility: Collection System: Utility Information Total number of Employees: 0 Number of Office Employees: 0 Note: The Company is comprised of contracted operations Does the utility have its own maintenance staff? If not, give the name the person(s) doing the work: Operations	Yes ⊠ Yes ⊠ s, billing, and w	No ☐ No ☐ customer ser	N/A N/A
General Questions Treatment Facility: Collection System: Utility Information Total number of Employees: 0 Number of Office Employees: 0 Note: The Company is comprised of contracted operations Does the utility have its own maintenance staff? If not, give the name the person(s) doing the work: Operations	Yes ⊠ Yes ⊠ s, billing, and w	No ☐ No ☐ customer ser	N/A N/A

Bluegrass Water Utility Company, LLC - LH Treatment

Periodic Compliance Inspection

807 KAR 5:006 (General Rules)

<u>Section 2:</u> General Provisions. Reference to standards or codes in 807 KAR Chapter 5 shall not prohibit a utility from continuing or initiating experimental work and installations to improve, decrease the cost of, or increase the safety of its service.

Section 4: Reports			
Has the utility filed its gross annual operating revenue	report?		
	Yes 🖂	No 🗌	N/A 🗌
Section 7: Billings, Meter Readings, and Information.			
Is the Billing and Collection handled by the Utility?	Yes 🗌	No 🖂	N/A 🗌
If no, then who? Billing and Collection is handled by Nitro	o Billing Servio	ces.	
Does each bill for utility service issued periodically by	a utility clea	rly show the	following?
The date the bill was issued:	Yes 🖂	No 🗌	N/A 🗌
Class of service:	Yes 🖂	No 🗌	N/A
Present and last preceding meter readings:	Yes 🗌	No 🗌	N/A 🔀
Date of the present reading:	Yes 🗌	No 🗌	N/A 🔀
Number of units consumed:	Yes 🗌	No 🗌	N/A 🔀
Net amount for service rendered:	Yes 🖂	No 🗌	N/A 🗌
All taxes:	Yes 🗌	No 🗌	N/A 🖂
Adjustments, if applicable:	Yes 🗌	No 🗌	N/A 🔀
The gross amount of the bill:	Yes 🖂	No 🗌	N/A 🗌
The date after which a penalty may apply to the gro	ss amount:		
	Yes 🖂	No 🗌	N/A 🗌
If the bill is estimated or calculated:	Yes 🗌	No 🗌	N/A 🖂
Is the rate schedule under which the bill is compu	ted posted o	n the utility	's Web site (if it
maintains a Web site)?	Yes 🖂	No 🗌	N/A
Note: Yes, the tariff (including the rate schedule) is four			e. Additionally, no
readings/units/etc. are included due to the nature of the	e flat rates cha	<u>irged.</u>	
Also furnished by one (1) of the following methods, by	' :		
Printing it on the bill: Publishing it in a newspaper of general circulation	Yes 🖂	No 🗌	N/A 🗌
rubiisiiiig it iii a newspaper oi general circulation	once each ye	aı.	

Bluegrass Water Utility Company, LLC – LH Treatment

Mailing it to each customer once each year; or:	Yes	No 🗌	N/A 🖂	
manning is to each eactomer energe each year, en	Yes 🗌	No 🗌	N/A 🖂	
Provide a place on each bill for a customer to indic				F
the applicable rates:	Yes 🖂	No 🗌	N/A 🗌	
Note: Due to the nature of the bills, the flat rate found on t				•
the service areas. Additionally, the bills have multiple option billing inquiries including questions regarding the rate sched		ig the Othity h	i tiley llave ally	•
Section 8. Deposits.				
Is the utility requiring a minimum cash deposit or other	ar duarantaa	from custom	nare to sacura	
payment of bills?	Yes 🗌	No 🖂	N/A	
Section 10: Customer Complaints to the Utility				
Upon complaint to a utility by a customer at the utility's the utility make a prompt and complete investigation a		•	•	
findings?	Yes 🛚	No 🗌	N/A	
Does the utility keep a record of all written complaints of	concerning th Yes ⊠	ne utility's se No □	rvice? N/A □	
Does the record include the following? The customer's name and address:	 Yes ⊠	— No □	N/A	
The customer's name and address. The date and nature of the complaint:	Yes 🖂	No 🗌	N/A	
The disposition of the complaint:	Yes 🖂	No 🗌	N/A	
Does the utility maintain these records for two (2) ye		_		ļ
complaint?	Yes 🖂	No 🔙	N/A 📙	
If a written complaint or a complaint made in person at the utility provide written notice to the customer of his commission?		to file a com		
Note: The Company does not maintain a local office, but this website. In the Order associated with Docket 2019-0010				-
operations without a local office.				
Does the utility provide the customer with the mailing a	ddress. Web s	site address.	and telephone	ļ
number of the commission?	Yes ⊠	No 🗌	N/A	

Periodic Compliance Inspection

Note: The Company does not maintain a local office but customer questions and provide the Commissions mailing number and provides this information on the utility's website	ı address, wel		
If a telephonic complaint is not resolved, does the ut customer of his or her right to file a complaint with the	• •		notice to the
Section 14: Utility Customer Relations			
Does the utility post and maintain regular business hou to assist its customers and to respond to inquiries fro complaints?		ission_regard	
Does the utility designate at least one (1) representations, resolve disputes, and negotiate partial payments.			
	Yes 🗌	No 🗌	N/A 🖂
Note: The Company does not maintain a local office, but customer questions, resolve disputes, and negotiate partial Order associated with Docket 2019-00104, the Commission local office.	payment plan	s thru telepho	ne only. In the
If the utility has an annual operating revenue of \$25 designated representative available during the utility's than seven (7) hours per day, five (5) days per week except the seven (8) days per week except the seven (9) days per week except the seven (9) days per week except the seven (9) days per week except the seven (10) days per week except the sev	s established	working ho	•
	Yes 🖂	No 🗌	N/A
If the utility has an annual operating revenue of less			

Note: The number is available on the website and customer bills.

than seven (7) hours per day, one (1) day per week?

Publish the telephone number in all service areas:

Bluegrass Water Utility Company, LLC - LH Treatment

Maintain a telephone:

Does the utility provide the following?

N/A

N/A

N/A

No 🗌

No 🗌

No 🗌

Yes 🗌

Yes 🖂

Yes 🖂

Permit all customers to contact the utility's designated	representativ	without ch	
remine an customers to contact the utility's designated	roprocontati	e without ch	arge:
	Yes ⊠	No 🗌	N/A
Does the utility prominently display in each office open shall post on its Web site, if it maintains a Web site) a scommission, of the customer's rights pursuant to administrative regulation?	summary, pre	pared and pr	ovided by the
Note: The Company does not maintain a local office, but this website. In the Order associated with Docket 2019-0010 operations without a local office. Records are kept electroreasonable notice at reasonable hours.	04, the Comm	nission approv	ved Bluegrass'
Section 20: Access to Property			
Do employees of the utility (whose duties require him to distinguishing uniform or other insignia, identifying the show a badge or other identification that shall identify the shows a badge or other identification that shall identify the shows a badge or other identification that shall identify the shows a badge or other identification that shall identify the shows a badge or other identification that shall identify the shows a badge or other identification that shall identify the sh	hem as an ei	mployee of tl	he utility, and
Section 23: System Maps and Records			
Does the utility have on file at its principal office loca request with the commission a map or maps of suitabl or holds itself ready to serve?			-
request with the commission a map or maps of suitabl	e scale of the Yes 4, the Comm rity to comply be filed upon re	e general terr No ission approving with mapping equest with the	itory it serves N/A red Bluegrass' requirements. e Commission.
request with the commission a map or maps of suitable or holds itself ready to serve? Note: In the Order associated with Docket 2019-0010-methodology of utilizing the Kentucky Infrastructure Autho The Company does maintain maps electronically that can be Additionally, the Company utilizes the Kentucky Infrastructure.	e scale of the Yes 4, the Comm rity to comply be filed upon re ure Authority fo	e general terr No ission approving with mapping equest with the principle or maps that can be seen as a s	itory it serves N/A red Bluegrass' requirements. e Commission. an show layers
request with the commission a map or maps of suitable or holds itself ready to serve? Note: In the Order associated with Docket 2019-0010-methodology of utilizing the Kentucky Infrastructure Author The Company does maintain maps electronically that can be Additionally, the Company utilizes the Kentucky Infrastructure including districts. Is the map or maps available in electronic format as	e scale of the Yes 4, the Comm rity to comply be filed upon re ure Authority fo	e general terr No ission approving with mapping equest with the pr maps that can be a digital.	itory it serves N/A red Bluegrass' requirements. e Commission. an show layers al geographic
request with the commission a map or maps of suitable or holds itself ready to serve? Note: In the Order associated with Docket 2019-0010-methodology of utilizing the Kentucky Infrastructure Author The Company does maintain maps electronically that can be Additionally, the Company utilizes the Kentucky Infrastructure including districts. Is the map or maps available in electronic format as database?	e scale of the Yes 4, the Comm rity to comply be filed upon re ure Authority fo	e general terr No ission approving with mapping equest with the pr maps that can be a digital.	itory it serves N/A red Bluegrass' requirements. e Commission. an show layers al geographic

Section	24:	Location	of	Records.
---------	-----	----------	----	----------

Section 24. Location of Necords.			
All records required by 807 KAR Chapter 5 shall be made available to representatives, agents, or staff at all reasonable hours.	•		•
Are all records required by 807 KAR Chapter 5 kept available to representatives, agents, or staff of the reasonable hours?		•	
In the Order associated with Docket 2019-00104, the without a local office. Records are kept electronically notice at reasonable hours.			
Section 25: Safety Program:			
Each utility shall adopt and execute a safety program operations. At a minimum, the safety program shall (1) Establish a safety manual with written guidelines to be followed by utility employees. (2) Instruct employees in safe methods of performing (3) Instruct employees who, in the course of their washock, asphyxiation, or drowning, in accepted methods the utility adopted and executed a safety programment.	: s for safe working their work. work, are subject nods of artificial	ng practices ot to the haz respiration.	and procedures
operations?	Yes 🖂	No 🗌	N/A
Note: Bluegrass Water contracts with Midwest Water wastewater treatment facility. Midwest Water Operation	•	•	nd maintain the
At a minimum, does the safety program include the	following?		
A safety manual with written guidelines for saf followed by utility employees:	fe working prac Yes 🗌	tices and pr No ⊡	ocedures to be N/A ⊠
Note: Bluegrass Water has no employees.			
Instruct employees in safe methods of performing t	_	No 🗆	NI/A NZ
Note: Bluegrass Water has no employees.	Yes 📙	No 📙	N/A 🖂
Bluegrass Water Utility Company, LLC – LH Treatment		Pa	age 6

Periodic Compliance Inspection

Instruct employees who, in the course of their wor shock, asphyxiation, or drowning, in accepted met	•		
Note: Bluegrass Water has no employees.			
Section 26: Inspection of Systems:			
(1) A utility shall adopt inspection procedures to assutility's facilities and compliance with KRS Chapter 2 these procedures with the commission for review. (2) Upon receipt of a report of a potentially hazardou shall inspect all portions of the system that are the sult (3) Appropriate records shall be kept by a utility to identify the inspect to correct the deficiencies.	278 and 807 K is condition a bject of the re lentify the ins	AR Chapter It a utility face Poort. Pection mad	5 and shall file cility, the utility le, the date and
Has the utility adopted inspection procedures to ass utility's facilities and compliance with KRS Chapter 27		•	•
Have these inspection procedures been filed with the	commission f Yes	for review? No ⊠	N/A 🗌
Upon receipt of a report of a potentially hazardous colinspect all portions of the system that are the subject		•	does the utility
Are appropriate records kept by a utility to identify the inspection, the person conducting the inspection, correct the deficiencies?	•	•	
Section 27: Reporting of Accidents, Property Damage,	, or Loss of Se	ervice.	
(1) Within two (2) hours following discovery each util notify the commission by telephone or electronic mai in: (a) Death or shock or burn requiring medical tre	il of a utility r	elated accide	ent that results

facility, or any accident requiring inpatient overnight hospitalization.

(c) Loss of service for four (4) or more hours to ten customers, whichever is less.	•	or 500 or mo	re of the utility's
(2) A summary written report shall be submitted by the (7) calendar days of the utility related accident. For g of the commission, shall, upon application in writing, submission of this report.	ood cause sh	nown, the ex	ecutive director
Has the Utility had any Accidents, Property Damage, o	or Loss of Sei Yes 🗌	rvice? No ⊠	N/A 🗌
If yes, was the Commission notified by telephone of discovery of a utility related accident that resulted in t			wo (2) hours of
Death, shock, or burn requiring medical treatment any accident requiring inpatient overnight hospital		or similar me	edical facility, or
any accident requiring inpatient overnight nospital	Yes 🗌	No 🗌	N/A 🖂
Actual or potential property damage of \$25,000 or	more: Yes 🗌	No 🗌	N/A 🖂
Loss of service for four (4) or more hours to ten (7 customers, whichever is less:	10) percent o	r 500 or mor	e of the utility's
	Yes 🗌	No 🗌	N/A 🖂
Was a summary written report submitted by the u calendar days of the utility related accident?	itility to the c	ommission	within seven (7)
calendar days of the utility related accident?	Yes 🗌	No 🗌	N/A 🖂
Section 28: Deviations from Administrative Regulation	<u>n:</u>		
In special cases, for good cause shown, the commiss administrative regulation.	ion shall perr	nit deviation	s from this
Has the utility been permitted by the commission to d regulations?	eviate from th Yes ⊠	nese adminis No 🗌	strative N/A
If so, provide the case no. Case No. 2019-00104.			
Bluegrass Water Utility Company, LLC – LH Treatment		Pa	age 8

Periodic Compliance Inspection

807 KAR 5:011 (Tariffs)

Section 12: Posting tariffs, Administrative Regulations, and Statutes

Does the utility display a suitable placard, in large typare available for public inspection?	oe, that states Yes	that the utiling No	ity's tariff and statute N/A ⊠
Note: The Company does not maintain a local office, be website. In the Order associated with Docket 2019 operations without a local office. Records are kept of reasonable notice at reasonable hours.	9-00104, the	Commission	approved Bluegras
Does the utility provide a suitable table or desk in its may view all effective tariffs?	office or place Yes	ce of busines	ss on which the pub
Note: The Company does not maintain a local office, be website. In the Order associated with Docket 2019 operations without a local office. Records are kept of reasonable notice at reasonable hours.	9-00104, the	Commission	approved Bluegras
Section 13: Special Contracts			
Does the utility have any special contracts that estab contained in its tariff?	olish rates, ch Yes	arges, or coi No ⊠	nditions of service n
If yes, has the utility filed the special contracts with the	e PSC?		
	Yes 🗌	No 🗌	N/A 🖂
807 KAR 5:071	(Sewage):		
Section 1: General. The purpose of this administrative regulations governing the service Jurisdiction of the Public Service Commission. Section 4: Information Available to Customers.			

(1) System maps or records. Each utility shall maintain up-to-date maps, plans, or records of its entire force main and collection systems, with such other information as may be necessary to enable the utility to advise prospective customers, and others entitled to the information, as to

Bluegrass Water Utility Company, LLC - LH Treatment

the facilities available for serving any locality.

Periodic Compliance Inspection

(2) Rates, rules, and regulations. A schedule of appeach class of customers and the approved rules available to any customer or prospective customer	and regulatio	ns of the sev	• •
Does the Utility have a current map and/or plans for its	system? Yes ⊠	No 🗌	N/A 🗌
Section 5. Quality of Service.			
(1) General. Each utility shall maintain and operate and properly equipped to collect, transport, and tr degree of purity required by the health laws of th agencies, federal, state, and local, having jurisdicti	eat sewage, a e State of Ke	and discharg entucky, and	e the effluent at the
(2) Limitations of service. No sewage disposal comor disposal any material except sewage as defregulation. In compliance with the administrative refforts to eliminate or prevent the entry of surfactindustrial liquid waste into its sanitary sewer system appropriate state, county, or municipal authorities relieve the utility of its aforementioned responsibilities.	fined by Sec egulation, the ee or ground em. A utility r s in its effort	tion 2(7) of utility shall water, or any may request	this administrative make all reasonable y corrosive or toxic assistance from the
Is the utility in compliance with the Division of Water?	Yes 🖂	No 🗌	N/A 🗌
Note: The Company is no longer under an Agreed Or	der with Divisi	ion of Water.	
Is the utility making every reasonable effort to eliminate or any corrosive or toxic industrial liquid waste into its	•	•	face or ground water,
Section 6: Continuity of Service.			
 (1) Emergency interruptions. Each utility shall male interruptions of service and when such interruption service with the shortest possible delay consistent general public. (2) Scheduled interruptions. Whenever any utility interruption of its service, it shall notify all custom 	ons occur shant with the sat	all endeavor fety of its cus ssary to sche	to reestablish stomers and the dule an
the time and anticipated duration of the interruption		_	
Bluegrass Water Utility Company, LLC – LH Treatment			Page 10

Periodic Compliance Inspection

nterruptions shall be made at such hours as will provide least inconvenience to the customers.						
(3) Record of interruptions. Each utility shall keep a complete record of all interruptions on its system. This record shall show the cause of interruption, date, time, duration, remedy, and steps taken to prevent recurrence.						
Is the utility making all reasonable efforts to prevent interruptions of service and when such interruptions occur shall endeavor to reestablish service with the shortest possible delay consistent with the safety of its customers and the public?						
	Yes 🛚	No 🗌	N/A 🗌			
If the utility schedules an interruption of service the interruption?	are all custo Yes ⊠	mers notified No 🗌	I that are affected by N/A □			
PROVIDE DOCUMENTATION DURING INSPECTION	ON IF ANY.					
Does the utility make all reasonable efforts to	cohodulo int	arruntiana at	t cuch hours as will			
provide least inconvenience to the customers?		No 🗌	N/A			
Does the utility maintain a record of all interrupt	ions of servi	ce regarding	the following items?			
	Yes 🖂	No 🗆	N/A			
Cause of interruption	Yes 🔀	No 🗌	N/A 🗌			
Date	Yes 🔯	No 🗌	N/A 🗌			
Time	Yes 🖂	No 🗌	N/A			
Duration	Yes 🖂	No 🗌	N/A			
Remedy	Yes 🔀	No 🗌	N/A			
# Of customers affected	Yes 🔀	No 🗌	N/A			
steps taken to prevent recurrence	Yes 🖂	No 🗌	N/A			

Section 7. Design, Construction, and Operation.

- (1) General. The sewage treatment facilities of the sewage utility shall be constructed, installed, maintained and operated in accordance with accepted good engineering practice to assure, as far as reasonably possible, continuity of service, uniformity in the quality of service furnished, and the safety of persons and property.
- (2) Design and construction requirements. The design and construction of the sewage utility's collecting sewers, treatment plant and facilities, and all additions thereto and modifications

Periodic Compliance Inspection

thereof, shall conform to the requirements of the Kentucky Department for Natural Resources and Environmental Protection, Bureau of Environmental Quality, Division of Water Quality.

- (3) Adequacy of facilities. The capacity of the sewage utility's sewage treatment facilities for the collection, treatment and disposal of sewage and sewage effluent must be sufficiently sized to meet all normal demands for service and provide a reasonable reserve for emergencies.
- (4) Inspection of facilities. Each sewage utility shall adopt procedures for inspection of its sewage treatment facilities to assure safe and adequate operation of its facilities and compliance with commission rules. These procedures shall be filed with the commission. Unless otherwise authorized in writing by the commission, the sewage utility shall make inspections of collecting sewers and manholes on a scheduled basis at intervals not to exceed one (1) year, unless conditions warrant more frequent inspections and shall make inspections of all mechanical equipment daily. The sewage utility shall maintain a record of findings and corrective actions required, and/or taken, by location and date.

nuity	of service	•	0 0
		afe and aded No	uate operation of its
d bas	is <u>a</u> t int	_	•
•	\boxtimes	No 🗌	N/A 🗌
monit	oring sy	ystem.	
		required, and	l/or taken, by location N/A □
	nuity of Yes sto a Yes sion, of the Yes Yes monit	nuity of service Yes Solve to assure solves Yes Solve the solves at interest Yes Yes Yes Yes Monitoring sy	s to assure safe and adec Yes No No Sion, does the sewage utility of basis at intervals not to Yes No Sion No



LH Treatment





Aeration Basin



Clarifier

Periodic Compliance Inspection

Comment: During this periodic regulatory compliance inspection, it was not possible to review/discuss every record relating to all Commission requirements. Therefore, in some instances the results contained in this report are indicative of those items inspected and reviewed on a sample basis.

Report by:

Brian L. Rice Utility Inspector

Bin J. Rie

Kentucky Public Service Commission

Date: July 26, 2022

COMMONWEALTH OF KENTUCKY ENERGY and ENVIRONMENT CABINET DEPARTMENT FOR ENVIRONMENTAL PROTECTION Division of Enforcement

NOTICE OF VIOLATION

To: LH WWTP Ali Alexander 1650 Des Peres Rd Suite 303 Des Peres, MO 63131

AI Name: LH WWTP AI ID: 163895 Activity ID: ENV20200002

County: Scott

Enforcement Case ID:

Date(s) Violation(s) Observed: 09/04/2020

This is to advise that you are in violation of the provisions cited below:

1 Violation Description for Subject Item AIOO0000163895(): No person shall, directly or indirectly, throw, drain, run or otherwise discharge into any of the waters of the Commonwealth, or cause, permit or suffer to be thrown, drained, run or otherwise discharged into such waters any pollutant, or any substance that shall cause or contribute to the pollution of the waters of the Commonwealth in contravention of the standards adopted by the cabinet or in contravention of any of the rules, regulations, permits, or orders of the cabinet or in contravention of any of the provisions of this

Description of Non Compliance:

chapter. [KRS 224.70-110]

Failing to comply with 40 CFR 122.41(a), as adopted by 401 KAR 5:065, Section 2(1), by failing to comply with the terms and conditions of KPDES Permit No. KY0081591, monitoring point 001-1, for Total Ammonia Nitrogen (as N). The permitted limit for Total Ammonia Nitrogen (as N) is concentration monthly avg., less than or equal to 4 mg/L. The facility reported the following: concentration monthly avg. 6 mg/L for June 2020.

The remedial measure(s), and date(s) to be completed by are as follows:

The permittee shall comply with the terms and conditions of the KPDES Permit. [KRS 224.70-110]

AI: LH WWTP -- 163895

Violations of the above cited statute(s) and/or regulation(s) are subject to a civil penalty per day per violation. Violations carry civil penalties of up to \$25,000 per day per violation depending on the statutes/regulations violated. In addition, violations may be concurrently enjoined. Compliance with remedial measures and their deadlines does not provide exemption from liability for violations during the period of remediation, nor prevent additional remedial measures from being required.

If you have questions or need further information, write or call the undersigned:

Department for Environmental Protection
Division of Enforcement
300 Sower Blvd
Frankfort, KY 40601
502-782-6859 (8:00 AM – 4:30 PM)

Issued By:

Michael B. Kroeger, Assistant Director

Date: December 4, 2020



Crystal Stevenson Health Env III Kentucky Department for Public Health P.O. Box 2597 Paducah, KY 42002

sent via email: Cstevenson@purchasehealth.org

May 10th, 2023

Subject: Periodic Wastewater Inspections – Notice to Correct Violations

Marshall Ridge – No Discharge

Ms. Stevenson-

This letter is submitted in response to your Inspection Report dated April 5th, 2023 (received April 11, 2023). Bluegrass Water purchases distressed small water and wastewater systems that often require extensive upgrades and repairs. Bluegrass Water transforms these utilities by using technology and innovation to quickly assess and invest in infrastructure that meets or exceeds state and federal standards. We have made considerable progress on corrective actions at eighteen facilities purchased in Kentucky since 2019. Based on your Inspection Report we understand the following deficiencies need to be addressed at this time.

Marshall Ridge Deficiency

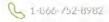
- Lagoon fencing damaged; gaps in the bottom of the fence in multiple areas.
- Failing overflow sewage laterals for lagoon. Standing sewage in area where overflow laterals are located.

Response to Deficiency

• Our operating partner has begun repairing the fence and as of 5/2/23 is 90% complete with one small opening left. The operator is also planning to add extra reinforcement for particularly determined varmints. An example of fence extended to ground level can be seen in the photo below.











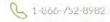
• We have inspected and verified the failing lateral drain field. A third-party engineering firm has been contracted to make plans for drain field improvements and to ensure the overflow does not recur. Design is underway and improvements will begin as soon as possible.

We appreciate your ongoing compliance assistance. If you have any questions regarding this submittal, please contact me directly at 314-492-8425 or jlundgren@cswrgroup.com.

Sincerely,

Justin Lundgren

EHS Compliance Coordinator







Crystal Stevenson Health Env III Kentucky Department for Public Health P.O. Box 2597 Paducah, KY 42002

sent via email: crystal.stevenson@ky.gov

May 10th, 2023

Subject: Periodic Wastewater Inspections – Notice to Correct Violations

Marshall Ridge - No Discharge

Ms. Stevenson-

This letter is submitted in response to your Inspection Report dated April 5th, 2023 (received April 11, 2023). Bluegrass Water purchases distressed small water and wastewater systems that often require extensive upgrades and repairs. Bluegrass Water transforms these utilities by using technology and innovation to quickly assess and invest in infrastructure that meets or exceeds state and federal standards. We have made considerable progress on corrective actions at eighteen facilities purchased in Kentucky since 2019. Based on your Inspection Report we understand the following deficiencies need to be addressed at this time.

Marshall Ridge Deficiency

- Lagoon fencing damaged; gaps in the bottom of the fence in multiple areas.
- Failing overflow sewage laterals for lagoon. Standing sewage in area where overflow laterals are located.

Response to Deficiency

 Our operating partner has begun repairing the fence and as of 5/2/23 is 90% complete with one small opening left. The operator is also planning to add extra reinforcement for particularly determined varmints. An Example of fence extended to ground level can be seen in the photo below.









We have inspected and verified the failing lateral drain field. A third-party engineering firm has been contracted to make plans for drain field improvements and to ensure the overflow does not recur. Design is underway and improvements will begin as soon as possible.

We appreciate your ongoing compliance assistance. If you have any questions regarding this submittal, please contact me directly at 314-492-8425 or <u>jlundgren@cswrgroup.com</u>.

Sincerely,

Justin Lundgren

EHS Compliance Coordinator





Andy Beshear Governor

Rebecca W. Goodman Secretary Energy and Environment Cabinet



Commonwealth of Kentucky

Public Service Commission
211 Sower Blvd.
P.O. Box 615

Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Kent A. Chandler Chairman

Mary Pat Regan Commissioner

July 29, 2022

Josiah Cox CEO Central States Water Resources 1630 Des Peres Rd., Suite 140 Des Peres, MO 63131

Re: Periodic Wastewater Inspection

Bluegrass Water Utility Operating Company, LLC - Persimmon Ridge Wastewater

System

Shelby County, KY

Dear Mr. Cox:

Public Service Commission staff performed a periodic inspection of the Bluegrass Water Utility Operating Company, LLC – Persimmon Ridge wastewater system located in Shelby County, KY on April 27, 2022, reviewing utility operations and management practices pursuant to Commission regulations. The report of this inspection is enclosed with this letter.

Based on the inspector's observations, no deficiencies were noted during this inspection.

Please review the enclosed inspection report in its entirety as you will find further information noted regarding the inspection. If you have any questions regarding this inspection, feel free to contact me at 502-330-5986 or via email at Brian.Rice@ky.gov.

Sincerely,

Brian L. Rice Utility Inspector

Public Service Commission

Enclosure(s)

Copy: Aaron Silas, Regulatory Case Manager

Jake Freeman, Director of Engineering, Central States Water Resources

Terry Merritt, VP of Midwest Water Operations

1351 Jefferson Street, Suite 301

Washington, MO 63090



An Equal Opportunity Employer M/F/D

Periodic Compliance Inspection

Persimmor	n Ridge	
d, Suite 140 S	St Louis, MO 63	<u>3131</u>
n, Arthur Faie	llo and Aaron S	<u>Silas</u>
ciencies note	d during this ins	spection
n? Yes □	No 🗌	N/A 🖂
s have not be	een addressed	l.,
Yes ⊠ Yes ⊠	No 🗌	N/A 🗌 N/A 🗍
ns, billing, and	d customer ser	vice.
Yes 🗌	No ⊠ N/	A 🗌
Water Opera	tions.	
	ciencies note n, Arthur Faie n? Yes have not be Yes Yes Yes Yes Yes Yes Yes Yes	Yes No No Shave not been addressed Yes No No No No No No No No No No No No No

Bluegrass Water Utility Company, LLC - Persimmon Ridge

Page 1

Periodic Compliance Inspection Yes No 🗌 N/A 🖂 Mailing it to each customer once each year: or: No 🗌 N/A 🖂 Yes 🗍 Provide a place on each bill for a customer to indicate the customer's desire for a copy of the applicable rates: Yes 🖂 No 🗔 Note: Due to the nature of the bills, the flat rate found on the bill is the rate schedule associated with the service areas. Additionally, the bills have multiple options for contacting the Utility if they have any billing inquiries including questions regarding the rate schedule. Section 8. Deposits. Is the utility requiring a minimum cash deposit or other guarantee from customers to secure payment of bills? Yes 🗌 No 🖂 N/A Section 10: Customer Complaints to the Utility Upon complaint to a utility by a customer at the utility's office, by telephone or in writing, does the utility make a prompt and complete investigation and advise the customer of the utility's findings? Yes 🖂 No 🗌 N/A Does the utility keep a record of all written complaints concerning the utility's service? Yes 🖂 No 🗌 N/A Does the record include the following? The customer's name and address: Yes 🖂 No N/A Yes 🖂 The date and nature of the complaint: N/A No Yes 🖂 The disposition of the complaint: No N/A Does the utility maintain these records for two (2) years from the date of resolution of the complaint? Yes 🖂 No N/A If a written complaint or a complaint made in person at the utility's office is not resolved, does the utility provide written notice to the customer of his or her right to file a complaint with the commission? Yes 🗌 No 🗌 **Note:** The Company does not maintain a local office, but this information is available via the Company's website. In the Order associated with Docket 2019-00104, the Commission approved Bluegrass' operations without a local office. Does the utility provide the customer with the mailing address, Web site address, and telephone number of the commission? Yes 🖂 No 🗌 N/A

Periodic Compliance Inspection

Permit all customers to contact the utility's designated r	epresentativ	e without cha	arge:	
	Yes ⊠	No 🗌	N/A	
Does the utility prominently display in each office open shall post on its Web site, if it maintains a Web site) a secommission, of the customer's rights pursuant to administrative regulation?	ummary, prej	pared and pr	ovided by	the
Note: The Company does not maintain a local office, but this website. In the Order associated with Docket 2019-00104 operations without a local office. Records are kept electro reasonable notice at reasonable hours.	the Comm	ission approv	ed Blueg	rass'
Section 20: Access to Property				
Do employees of the utility (whose duties require him to distinguishing uniform or other insignia, identifying the show a badge or other identification that shall identify the	em as an en	nployee of th	ne utility,	
Section 23: System Maps and Records				
Does the utility have on file at its principal office locat request with the commission a map or maps of suitable or holds itself ready to serve?				
Note: In the Order associated with Docket 2019-00104 methodology of utilizing the Kentucky Infrastructure Authori The Company does maintain maps electronically that can be Additionally, the Company utilizes the Kentucky Infrastructur including districts.	ty to comply e filed upon re	with mapping equest with the	requireme Commis	ents.
Is the map or maps available in electronic format as database?	a PDF file o Yes ⊠	or as a digita No ☐	al geogra N/A 🗌	phic
Is the following data available on the map or maps?				
Operating districts	Yes	No 🗌	N/A 🖂	
Rate districts: Communities served:	Yes ☐ Yes ⊠	No 🗌 No 🔲	N/A ⊠ N/A □	
Bluegrass Water Utility Company, LLC – Persimmon Ridge		Page	5	

Page 2039 of 2110

Periodic Compliance Inspection

Instruct employees who, in the course of their work, are subject to the hazard of electrical shock, asphyxiation, or drowning, in accepted methods of artificial respiration: Yes \(\sum \) No \(\sum \) N/A \(\sum \)
Note: Bluegrass Water has no employees.
Section 26: Inspection of Systems:
(1) A utility shall adopt inspection procedures to assure safe and adequate operation of the utility's facilities and compliance with KRS Chapter 278 and 807 KAR Chapter 5 and shall file these procedures with the commission for review.(2) Upon receipt of a report of a potentially hazardous condition at a utility facility, the utility shall inspect all portions of the system that are the subject of the report.
(3) Appropriate records shall be kept by a utility to identify the inspection made, the date and time of inspection, the person conducting the inspection, deficiencies found, and action taken to correct the deficiencies.
Has the utility adopted inspection procedures to assure safe and adequate operation of the utility's facilities and compliance with KRS Chapter 278 and 807 KAR Chapter 5? Yes □ No □ N/A □
Have these inspection procedures been filed with the commission for review? Yes □ No ☒ N/A □
Upon receipt of a report of a potentially hazardous condition at a utility facility, does the utility inspect all portions of the system that are the subject of the report? Yes No NA
Are appropriate records kept by a utility to identify the inspection made, the date and time of inspection, the person conducting the inspection, deficiencies found, and action taken to correct the deficiencies? Yes No No N/A
Section 27: Reporting of Accidents, Property Damage, or Loss of Service.
(1) Within two (2) hours following discovery each utility, other than a natural gas utility, shall notify the commission by telephone or electronic mail of a utility related accident that results in: (a) Death or shock or burn requiring medical treatment at a hospital or similar medical
facility, or any accident requiring inpatient overnight hospitalization.
Bluegrass Water Utility Company, LLC – Persimmon Ridge Page 7

Periodic Compliance Inspection

807 KAR 5:011 (Tariffs)

Section 12: Posting tariffs, Administrative Regulations, and Statutes

Does the utility display a suitable placard, in large type, that states that the utility's tariff and state available for public inspection? Yes \square No \square N/A \boxtimes
Note: The Company does not maintain a local office, but this information is available via the Company website. In the Order associated with Docket 2019-00104, the Commission approved Bluegoperations without a local office. Records are kept electronically and can be made available treasonable notice at reasonable hours.
Does the utility provide a suitable table or desk in its office or place of business on which the p may view all effective tariffs? Yes No No N/A
Note: The Company does not maintain a local office, but this information is available via the Company website. In the Order associated with Docket 2019-00104, the Commission approved Blueg operations without a local office. Records are kept electronically and can be made available treasonable notice at reasonable hours.
Section 13: Special Contracts
Does the utility have any special contracts that establish rates, charges, or conditions of service contained in its tariff? Yes \square No \boxtimes N/A \square
If yes, has the utility filed the special contracts with the PSC?
Yes ☐ No ☐ N/A ⊠
807 KAR 5:071 (Sewage):
Section 1: General. The purpose of this administrative regulation is to provide standard radministrative regulations governing the service of sewage utilities operating under Jurisdiction of the Public Service Commission. Section 4: Information Available to Customers. (1) System maps or records. Each utility shall maintain up-to-date maps, plans, or records entire force main and collection systems, with such other information as may be necessal enable the utility to advise prospective customers, and others entitled to the information, a
the facilities available for serving any locality. Bluegrass Water Utility Company, LLC – Persimmon Ridge Page 9

Periodic Compliance Inspection

(2) Scheduled interruptions. Whenever any utility finds it necessary to schedule an interruption of its service, it shall notify all customers to be affected by the interruption stating the time and anticipated duration of the interruption. Whenever possible, scheduled interruptions shall be made at such hours as will provide least inconvenience to the customers.				
(3) Record of interruptions. Each utility shall kee system. This record shall show the cause of inter- taken to prevent recurrence.			-	
Is the utility making all reasonable efforts to prointerruptions occur shall endeavor to reestabliconsistent with the safety of its customers and the	ish service v			
•	Yes 🖂	No 🗌	N/A 🗌	
If the utility schedules an interruption of service the interruption?	are all custo Yes ⊠	mers notified	I that are affected by	
PROVIDE DOCUMENTATION DURING INSPECTION	ON IF ANY.			
Does the utility make all reasonable efforts to provide least inconvenience to the customers?	schedule int Yes ⊠	erruptions at	t such hours as will N/A	
Does the utility maintain a record of all interrupt				
Cause of interruption Date Time Duration Remedy # Of customers affected steps taken to prevent recurrence	Yes \(\times \) Yes \(\times \) Yes \(\times \) Yes \(\times \) Yes \(\times \) Yes \(\times \) Yes \(\times \)	No	N/A	
Section 7. Design, Construction, and Operation.				
(1) General. The sewage treatment facilities of the sewage utility shall be constructed, installed, maintained and operated in accordance with accepted good engineering practice to assure, as far as reasonably possible, continuity of service, uniformity in the quality of service furnished, and the safety of persons and property.				



Persimmon Ridge WWTF



Periodic Compliance Inspection Utility: JoAnn Estates Utilities, Inc. Utility's Principal office location: 6550 US Hwy 60 W Paducah, KY 42001 Utility representative during inspection: Brian Waid and Todd Teas Counties served: McCracken Name of Plant: **Customers:** JoAnn Estates -156 Timberland -68 Wilmington-Chiles -60 Investigator: Brian L. Rice Date(s) of inspection: August 27 and August 31, 2018 Date(s) of last inspection: December 3, 2015 Deficiencies noted during the last inspection: 2 Have deficiencies been corrected since last inspection? Yes 🗌 No 🖂 N/A Person(s) who should receive this inspection report: Name: Brian Waid Title: President 6550 US Hwy 60 W Address: Email: waidbrian@gmail.com **General Questions**

Yes 🖂

No 🗌

Number of Treatment Facilities: 3

JoAnn Estates Utilities, Inc.

Treatment Facility:

N/A

Periodic Compliance Inspection

Name of Treatment Facilities:

- JoAnn Estates WWTP (Al#-3047) 2 Extended Aeration treatment plants side by side with one lagoon and a concrete chlorine contact basin – Facility located off Connie Sue Drive
- 2. **Wilmington-Chiles WWTP (Al#3080)** 2 Extended Aeration treatment plants side by side with three lagoons, a concrete chlorine contact basin and a lift station Facility located off Craven Drive
- 3. **Timberland WWTP (Al#3070)** 1 Extended Aeration treatment plant with an influent lift station, a lagoon and a concrete chlorine contact basin Facility located off Timberland Drive

Age of Plant(s): 42 yrs, 25 yrs, 32 yrs			
Collection System:	Yes ⊠	No 🗌	N/A 🗌
Type of Collection system: Gravity			
Are both the pumping equipment and the elements?	electrical wiring Yes ⊠	protected fr No □	om exposure to N/A □
Are their residential grinder stations i	n the utility's sys Yes □		N/A 🗌
If so, please provide the following info	ormation:		
No. of Grinder Stations: N/A			
Type: N/A			
Who owns these grinder stations:	Utility 🗌 Resid	ents 🗌 Otl	ner 🗌 N/A 🖂
Who operates and maintains these in	dividual grinder s	stations?	
	Utility 🗌 Resid	ents 🗌 Ot	her 🗌 N/A 🖂
<u>Utility Information</u>			
Total Number of Employees: 2			

JoAnn Estates Utilities, Inc.

Perio	dic Complia	ance Inspecti	on	
Number of Office Employees: Number of Field Employees: Contracted Operator:	2 0 1			
	807 KAF (General			
<u>Section 2:</u> General Provisions. Reference to standards or codes in 807 KAR Chapter 5 shall not prohibit a utility from continuing or initiating experimental work and installations to improve, decrease the cost of, or increase the safety of its service.				
Section 4: Reports				
Has the utility filed its gross and a	annual opera	ating revenue	report?	
		Yes $oxed{oxed}$	No 🗌	N/A
Section 7: Billings, Meter F	<u>Readings,</u>	and Inform	ation.	
Billing and Collection is done by	oy:			
JoAnn Estates and Wilmington-C	chiles - Padu	ıcah Water		
Timberland - West McCracken W	ater District	-		
Does each bill for utility service following?	ce issued p	periodically b	y a utility c	learly show the
The date the bill was issued:		Yes ⊠	No 🗌	N/A 🗌
Class of service:		Yes ⊠	No 🗌	N/A 🗌
Present and last preceding meter	r readings:	Yes ⊠	No 🗌	N/A 🗌
Date of the present reading:		Yes ⊠	No 🗌	N/A 🗌
Number of units consumed:		Yes ⊠	No 🗌	N/A 🗌
Net amount for service rendered:	:	Yes ⊠	No 🗌	N/A 🗌
All taxes:		Yes ⊠	No 🗌	N/A 🗌

JoAnn Estates Utilities, Inc.

Case No. 2022-00432 Bluegrass Water's Response to OAG 1-34 Exhibit OAG 1-34

Page 2046 of 2110

Periodic Compliance Inspection				
Adjustments, if applicable:	Yes ⊠	No 🗌	N/A 🗌	
The gross amount of the bill:	Yes ⊠	No 🗌	N/A 🗌	
The date after which a penalty may apply to th	e gross amou	nt:		
	Yes ⊠	No 🗌	N/A 🗌	
Is the rate schedule under which the bill is commaintains a Web site)?	nputed posted Yes	on the utility's	s Web site (if it N/A ⊠	
Also furnished by one (1) of the following meth	ods, by:			
Printing it on the bill:	Yes ⊠	No 🗌	N/A 🗌	
Publishing it in a newspaper of general circulate	tion once each	n year:		
	Yes 🗌	No 🗌	N/A 🖂	
Mailing it to each customer once each year; or:				
	Yes 🗌	No 🗌	N/A 🖂	
Provide a place on each bill for a customer to of the applicable rates:	indicate the o	customer's de No ⊠	sire for a copy	
Does the utility maintain the information requito the commission and any customer requesting	•		l is it available	
	Yes ⊠	No 🗌	N/A	
Section 8. Deposits.				
Is the utility requiring a minimum cash depos secure payment of bills?	sit or other gu	uarantee from No ⊠	customers to N/A	
Section 10: Customer Complaints to the Utility Upon complaint to a utility by a customer at the utility's office, by telephone or in writing, does the utility make a prompt and complete investigation and advise the customer of the utility's findings? Yes ☑ No ☐ N/A ☐				
		- 7- □	- 	

JoAnn Estates Utilities, Inc.

Does the record include the following? The customer's name and address: Yes No No N/A The date and nature of the complaint: Yes No N/A The disposition of the complaint: Yes No N/A N/A The disposition of the complaint: Yes No N/A N/A Does the utility maintain these records for two (2) years from the date of resolution of the complaint? Yes No N/A N/A If a written complaint or a complaint made in person at the utility's office is not resolved, does the utility provide written notice to the customer of his or her right to file a complaint with the commission? Yes No N/A N/A Does the utility provide the customer with the mailing address, Web site address, and telephone number of the commission? Yes No N/A N/A If a telephonic complaint is not resolved, does the utility provide at least oral notice to the customer of his or her right to file a complaint with the commission? Yes No N/A N/A Section 14: Utility Customer Relations Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints? Yes No N/A N/A Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the	Periodic Compliance Inspection			
The customer's name and address: Yes \int No \int N/A \int \ The date and nature of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The disposition of the complaint: Yes \int No \int N/A \int \ The date of two (2) years from the date of two (2) years from the date of the utility position of the commission? Yes \int No \int N/A \int \ The date of two (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes \int No \int N/A \int \ The date of two \int N/A \int \ The utility has an annual operating revenues more than \$250,000, is there a	Does the utility keep a record of all writte service?			· ·
The date and nature of the complaint: Yes No No N/A The disposition of the complaint: Yes No N/A N/A Does the utility maintain these records for two (2) years from the date of resolution of the complaint? Yes No N/A If a written complaint or a complaint made in person at the utility's office is not resolved, does the utility provide written notice to the customer of his or her right to file a complaint with the commission? Yes No N/A Does the utility provide the customer with the mailing address, Web site address, and telephone number of the commission? Yes No N/A If a telephonic complaint is not resolved, does the utility provide at least oral notice to the customer of his or her right to file a complaint with the commission? Yes No N/A Section 14: Utility Customer Relations Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints? Yes No N/A Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes No N/A If the utility has an annual operating revenues more than \$250,000, is there a	Does the record include the following?			
The disposition of the complaint: Yes No No N/A Does the utility maintain these records for two (2) years from the date of resolution of the complaint? Yes No No N/A DIF a written complaint or a complaint made in person at the utility's office is not resolved, does the utility provide written notice to the customer of his or her right to file a complaint with the commission? Yes No N/A DOES THE UTILITY OF THE WORLD	The customer's name and address:	Yes ⊠	No 🗌	N/A 🗌
Does the utility maintain these records for two (2) years from the date of resolution of the complaint? If a written complaint or a complaint made in person at the utility's office is not resolved, does the utility provide written notice to the customer of his or her right to file a complaint with the commission? Yes No N/A Does the utility provide the customer with the mailing address, Web site address, and telephone number of the commission? Yes No N/A If a telephonic complaint is not resolved, does the utility provide at least oral notice to the customer of his or her right to file a complaint with the commission? Yes No N/A Section 14: Utility Customer Relations Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints? Yes No N/A Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes No N/A If the utility has an annual operating revenues more than \$250,000, is there a	The date and nature of the complaint:	Yes ⊠	No 🗌	N/A 🗌
If a written complaint? Yes No N/A If a written complaint or a complaint made in person at the utility's office is not resolved, does the utility provide written notice to the customer of his or her right to file a complaint with the commission? Yes No N/A Does the utility provide the customer with the mailing address, Web site address, and telephone number of the commission? Yes No N/A If a telephonic complaint is not resolved, does the utility provide at least oral notice to the customer of his or her right to file a complaint with the commission? Yes No N/A Section 14: Utility Customer Relations Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints? Yes No N/A Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes No N/A If the utility has an annual operating revenues more than \$250,000, is there a	The disposition of the complaint:	Yes ⊠	No 🗌	N/A 🗌
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Does the utility provide the customer with the mailing address, Web site address, and telephone number of the commission? Yes No N/A If a telephonic complaint is not resolved, does the utility provide at least oral notice to the customer of his or her right to file a complaint with the commission? Yes No N/A Section 14: Utility Customer Relations Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints? Yes No N/A Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes No N/A If the utility has an annual operating revenues more than \$250,000, is there a	If a written complaint or a complaint made in person at the utility's office is not resolved, does the utility provide written notice to the customer of his or her right to file a complaint with the commission?			
Yes No N/A N/A N/A N/A N/A N/A N/A N/A N/A N/A		Yes ⊠	No 🗌	N/A 🗌
If a telephonic complaint is not resolved, does the utility provide at least oral notice to the customer of his or her right to file a complaint with the commission? Yes No No N/A Section 14: Utility Customer Relations Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints? Yes No N/A Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes No N/A If the utility has an annual operating revenues more than \$250,000, is there a	Does the utility provide the customer with tand telephone number of the commission?	the mailing a	ddress, Web	site address,
notice to the customer of his or her right to file a complaint with the commission? Yes No N/A N/A Section 14: Utility Customer Relations Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints? Yes No N/A Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes No N/A If the utility has an annual operating revenues more than \$250,000, is there a		Yes ⊠	No 🗌	N/A 🗌
Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints? Yes No N/A Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes No No N/A If the utility has an annual operating revenues more than \$250,000, is there a	•	file a compla	nint with the o	commission?
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Does the utility designate at least one (1) representative to be available to answer customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes \boxtimes No \square N/A \square If the utility has an annual operating revenues more than \$250,000, is there a	Does the utility post and maintain regular business hours and provide representatives available to assist its customers and to respond to inquiries from the commission regarding customer complaints?			
customer questions, resolve disputes, and negotiate partial payment plans at the utility's office? Yes No No N/A If the utility has an annual operating revenues more than \$250,000, is there a			No 🗌	N/A 🗌
·		negotiate pa	rtial paymen	t plans at the
				•

Periodic Compliance Inspection				
not fewer than seven (7) hours per day, holidays?	five (5) days Yes □	per week No 🗌	excluding legal N/A ⊠	
If the utility has an annual operating revenues less than \$250,000, is there a designated representative available during the utility's established working hours not fewer than seven (7) hours per day, one (1) days per week?				
	Yes 🖂	No 🗌	N/A 🗌	
Does the utility provide the following?				
Maintain a telephone:	Yes ⊠	No 🗌	N/A	
Publish the telephone number in all service	e areas:			
	Yes ⊠	No 🗌	N/A 🗌	
Permit all customers to contact the util charge:	ity's designat	ed represe	entative without	
	Yes ⊠	No 🗌	N/A 🗌	
Does the utility prominently display in each office open to the public for customer service (and shall post on its Web site, if it maintains a Web site) a summary, prepared and provided by the commission, of the customer's rights pursuant to this section and Section 16 of this administrative regulation?				
	Yes 🖂	No	N/A	
Section 20: Access to Property				
Do employees of the utility (whose duties require him to enter the customer's premises) wear a distinguishing uniform or other insignia, identifying them as an employee of the utility, and show a badge or other identification that shall identify them as an employee of the utility? Yes \square No \square N/A \boxtimes				
Section 23: System Maps and Recor	<u>'ds</u>			
Does the utility have on file at its principal file upon request with the commission a general territory it serves or holds itself re	n map or map	s of suital		
general territory it serves or noids itself re	Yes 🖂	No 🗌	N/A 🗌	

JoAnn Estates Utilities, Inc.

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Periodic Complian	ce Inspection	1		
Is the map or maps available in electronic geographic database?	c format as Yes [a PDF file o⊓ No ⊠	r as a digital N/A □	
Is following data available on the map or ma	aps?			
Operating districts:	Yes 🗌	No 🖂	N/A 🗌	
Rate districts	Yes 🗌	No 🖂	N/A 🗌	
Communities served:	Yes 🗌	No 🖂	N/A 🗌	
Section 24: Location of Records.				
All records required by 807 KAR Chapter 5 and shall be made available to representative upon reasonable notice at all reasonable ho	es, agents, o		-	
Are all records required by 807 KAR Chapter 5 kept in the office of the utility and shall be made available to representatives, agents, or staff of the commission upon reasonable notice at all reasonable hours? Yes No No N/A				
Section 25: Safety Program:				
Each utility shall adopt and execute a safety program, appropriate to the size and type of its operations. At a minimum, the safety program shall:				
(1) Establish a safety manual with written guidelines for safe working practices and procedures to be followed by utility employees;				
(2) Instruct employees in safe methods of performing their work.				
(3) Instruct employees who, in the course of their work, are subject to the hazard of electrical shock, asphyxiation, or drowning, in accepted methods of artificial respiration.				
Has the utility adopted and executed a safety profits operations?	orogram, appı Yes ⊠	opriate to the	size and type N/A □	
At a minimum, does the safety program include the following?				
A safety manual with written guidelines for safe followed by utility employees:	e working pra∉ Yes ⊠	ctices and pro	cedures to be	

Periodic Complia	nce Inspection	on	
Instruct employees in safe methods of perform	ming their worl Yes ⊠	k. No 🗌	N/A 🗌
Instruct employees who, in the course of electrical shock, asphyxiation, or drowning, in		•	
	Yes ⊠	No 🗌	N/A 🗌
Section 26: Inspection of Systems:			
(1) A utility shall adopt inspection pro- operation of the utility's facilities and con KAR Chapter 5 and shall file these proced	npliance with	KRS Chapte	er 278 and 807
(2) Upon receipt of a report of a potentially hazardous condition at a utility facility, the utility shall inspect all portions of the system that are the subject of the report.			
(3) Appropriate records shall be kept by a the date and time of inspection, the deficiencies found, and action taken to co	person co	onducting th	
Has the utility adopted inspection procedures the utility's facilities and compliance with KRS		•	•
	Yes ⊠	No 🗌	N/A 🗌
Have these inspection procedures been filed	with the comn	nission for rev	riew?
	Yes ⊠	No 🗌	N/A 🗌
Upon receipt of a report of a potentially hazardous condition at a utility facility, does the utility inspect all portions of the system that are the subject of the report?			
	Yes ⊠	No 🗌	N/A 🗌
Are appropriate records kept by a utility to i time of inspection, the person conducting the taken to correct the deficiencies?	-	•	
(8) Sewage utility inspection. Each sewage utility shall make systematic inspections of its system in the manner established in 807 KAR 5:071 to ensure that the commission's safety requirements are being met. These inspections shall			

JoAnn Estates Utilities, Inc.

Periodic Compliance Inspection

be made as often as necessary but not less frequently than as established in 807 KAR 5:071.

<u>Section 27: Reporting of Accidents, Property Damage, or Loss of Service.</u>

- (1) Within two (2) hours following discovery each utility, other than a natural gas utility, shall notify the commission by telephone or electronic mail of a utility related accident that results in:
- (a) Death or shock or burn requiring medical treatment at a hospital or similar medical facility, or any accident requiring inpatient overnight hospitalization;
- (b) Actual or potential property damage of \$25,000 or more; or
- (c) Loss of service for four (4) or more hours to ten (10) percent or 500 or more of the utility's customers, whichever is less.
- (2) A summary written report shall be submitted by the utility to the commission within seven (7) calendar days of the utility related accident. For good cause shown, the executive director of the commission, shall, upon application in writing, allow a reasonable extension of time for submission of this report.

Within two (2) hours following discovery does the utility notify the commission by telephone or electronic mail of a utility related accident that results in the following:

Death or shock or burn requiring medical treatment at a hospital or similar medical facility, or any accident requiring inpatient overnight hospitalization:

	Yes ⊠	No 🗌	N/A 🗌
Actual or potential property damage of \$25,000	or more:		
	Yes ⊠	No 🗌	N/A 🗌
Loss of service for four (4) or more hours to utility's customers, whichever is less:	ten (10) per Yes ⊠	cent or 500 c	or more of the
Are summary written reports submitted by the calendar days of the utility related accident?	·	commission wi	ithin seven (7) N/A

Periodic Compliance Inspection

<u>Section 28: Deviations from Administrative Regulation:</u> In special cases, for good cause shown, the commission shall permit deviations from this administrative regulation.

Has the utility been permitted by the commission to deviate from these administrative regulations?			ministrative
Togulations:	Yes 🗌	No 🗌	N/A ⊠
If yes, provide a list of the deviations (Case Nu	ımber):		
807 KAR 5 (Tariff	_		
Section 12: Posting tariffs, Administr	ative Regu	lations, and	l Statutes
Does the utility display a suitable placard, in la and statutes are available for public inspection	•	t states that th	ne utility's tariff
	Yes ⊠	No 🗌	N/A 🗌
Does the utility provide a suitable table or d which the public may view all effective tariffs?		ce or place o	of business on N/A ⊠
Section 13: Special Contracts			
Does the utility have any special contracts that service not contained in its tariff?	t establish rat Yes	es, charges, c No ⊠	or conditions of N/A
If yes, has the utility filed the special contracts	with the PSC	? No □	N/A ⊠
807 KAR 5:071 (Sewage):			
Section 1: General. The purpose of this administrative regulation is to provide standard rules administrative regulations governing the service of sewage utilities operating under the Jurisdiction of the Public Service Commission.			
Section 4: Information Available to Cu	ustomers.		
JoAnn Estates Utilities, Inc.	<u> </u>		

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Periodic Compliance Inspection

(1) System maps or records. Each utility shall maintain up-to-date maps, plans, or
records of its entire force main and collection systems, with such other information
as may be necessary to enable the utility to advise prospective customers, and
others entitled to the information, as to the facilities available for serving any
locality.

locality.			
(2) Rates, rules, and regulations. A sapplicable for each class of custome the sewage utility shall be available trequest.	ers and the appro	ved rules and	d regulations of
Does the Utility have a current map and	or plans for its sys	tem?	
	Yes ⊠	No 🗌	N/A 🗌
(1) General. Each utility shall maintage adequate size and properly equippe discharge the effluent at the degree State of Kentucky, and all other rehaving jurisdiction over such matters	d to collect, trans of purity require egulatory agencie	sport, and treed by the hea	eat sewage, and alth laws of the
(2) Limitations of service. No sewage disposal company shall be obliged to receive for treatment or disposal any material except sewage as defined by Section 2(7) of this administrative regulation. In compliance with the administrative regulation, the utility shall make all reasonable efforts to eliminate or prevent the entry of surface or ground water, or any corrosive or toxic industrial liquid waste into its sanitary sewer system. A utility may request assistance from the appropriate state, county, or municipal authorities in its efforts, but such a request does not relieve the utility of its aforementioned responsibilities.			
Is the utility in compliance with the Divis	sion of Water? Yes	No 🖂	N/A 🗌
Note: See Attachment A	_		_
Is the utility making every reasonable or ground water, or any corrosive or to system?		-	-

JoAnn Estates Utilities, Inc.

Periodic Compliance Inspection

Section 6: Continuity of Service.

- (1) Emergency interruptions. Each utility shall make all reasonable efforts to prevent interruptions of service and when such interruptions occur shall endeavor to reestablish service with the shortest possible delay consistent with the safety of its customers and the general public.
- (2) Scheduled interruptions. Whenever any utility finds it necessary to schedule an interruption of its service, it shall notify all customers to be affected by the interruption stating the time and anticipated duration of the interruption. Whenever possible, scheduled interruptions shall be made at such hours as will provide least inconvenience to the customers.
- (3) Record of interruptions. Each utility shall keep a complete record of all interruptions on its system. This record shall show the cause of interruption, date, time, duration, remedy, and steps taken to prevent recurrence.

Is the utility making all reasonable efforts to prevent interruptions of service and when such interruptions occur shall endeavor to reestablish service with the shortest possible delay consistent with the safety of its customers and the general public? Yes 🖂 No N/A If the utility schedules an interruption of service are all customers notified that are N/A 🖂 affected by the interruption? Yes No Does the utility make all reasonable efforts to schedule interruptions at such hours as will provide least inconvenience to the customers? Yes 🖂 No 🗌 N/A Does the utility maintain a record of all interruptions of service with regard to the following items? Yes 🖂 No 🗌 $N/A \times$ Cause of interruption Yes 🖂 No N/A Date Yes 🖂 N/A No Time Yes 🖂 N/A No Yes 🖂 Duration No N/A Remedy Yes 🖂 No 🗌 N/A # of customers affected Yes 🖂 No N/A Yes 🖂 N/A steps taken to prevent reoccurrence No

JoAnn Estates Utilities, Inc.

Kentucky Public Service Commission
Periodic Compliance Inspection
Is standby pumping equipment provided in the event of failure of the primary pumping equipment? Yes No N/A
Section 7. Design, Construction, and Operation.
(1) General. The sewage treatment facilities of the sewage utility shall be constructed, installed, maintained and operated in accordance with accepted good engineering practice to assure, as far as reasonably possible, continuity of service uniformity in the quality of service furnished, and the safety of persons and property.
(2) Design and construction requirements. The design and construction of the sewage utility's collecting sewers, treatment plant and facilities, and all additions thereto and modifications thereof, shall conform to the requirements of the Kentucky Department for Natural Resources and Environmental Protection, Bureau of Environmental Quality, Division of Water Quality.
(3) Adequacy of facilities. The capacity of the sewage utility's sewage treatment facilities for the collection, treatment and disposal of sewage and sewage effluent must be sufficiently sized to meet all normal demands for service and provide a reasonable reserve for emergencies.
(4) Inspection of facilities. Each sewage utility shall adopt procedures for inspection of its sewage treatment facilities to assure safe and adequate operation of its facilities and compliance with commission rules. These procedures shall be filed with the commission. Unless otherwise authorized in writing by the commission, the sewage utility shall make inspections of collecting sewers and manholes on a scheduled basis at intervals not to exceed one (1) year, unless conditions warrant more frequent inspections and shall make inspections of all mechanical equipment on a daily basis. The sewage utility shall maintain a record of findings and corrective actions required, and/or taken, by location and date.
Is the utility operating and maintaining their facility in accordance with accepted good engineering practice to assure, as far as reasonably possible, continuity of service uniformity in the quality of service furnished, and the safety of persons and property?
Yes ☐ No ☒ N/A ☐

JoAnn Estates Utilities, Inc.

Note: See Inspector Comments

Periodic Compliance Inspection

Is the utility adhering to their inspection procedures to assure safe and adequate operation of its facilities and compliance with the Commission rules?			
	Yes ⊠	No 🗌	N/A 🗌
Unless otherwise authorized in writing by the inspections of their collecting sewers and mannet to exceed one (1) year, unless conditions	anholes on a	scheduled ba	sis at intervals
Note: No records were produced during inspe	Yes ction. (Repea	No ⊠ at)	N/A 🗌
Does the utility make inspections of all mecha	nical equipme	ent on a daily b	pasis?
Does the utility maintain a record of findings	Yes s and correct		N/A equired, and/or
taken, by location and date?	Yes ⊠	No 🗌	N/A 🗌
<u>Findings</u>			

- 1. The utility is not conducting annual inspections of their collecting sewers and manholes as required by 807 KAR 5:071, Section 7(4). (Repeat)
- 2. The utility is not conducting daily inspections on all mechanical equipment at each treatment facility as required by 807 KAR 5:071, Section 7(4).
- 3. At JoAnn estates wastewater treatment facility, the entrance gate to the plants has a gap between the fence post and gate large enough for animals and unauthorized persons to enter. This is contrary to 807 KAR 5:071, Section 7(1).
- 4. At JoAnn estates wastewater treatment facility, the gate behind the chlorine contact basin that allows utility personnel access to the effluent discharge was not locked or secured to keep unauthorized persons from entering the facility. This is contrary to 807 KAR 5:071, Section 7(1).
- 5. At Wilmington-Chiles, plant #2 has a leak at the effluent pipe that leads to one of the lagoons. This leak is before any type of disinfecting takes place.

JoAnn Estates Utilities, Inc.

Periodic Compliance Inspection

- 6. At the Timberland wastewater treatment facility, there's untreated wastewater bypassing the chlorine contact chamber and entering the receiving stream. This is contrary to 807 KAR 5:071, Section 7(1).
- 7. The grating near the bar screen at the Timberland wastewater facility has deteriorated and appears to be unsafe to walk on. This is contrary to 807 KAR 5:071, Section 7(1).
- 8. The utility doesn't have a backup blower/motor unit nor do they have an immediate access to one for each of the three wastewater treatment facilities in case of emergencies as per 807 KAR 5:071, Section 7(1).
- 9. The utility is out of compliance with the Division of Water's regulations. This is contrary to 807 KAR 5:071, Section 5(1).

Additional Inspector Comments

Observations/Areas of Concern

JoAnn Estates WWTP (2 wwtp's):

- Plant #1 and #2 continues to show major rust and deterioration. Plant #1's metal
 partitions are showing major rust and deterioration. Plant #2's angle iron cross
 bars have deteriorated to the point that the structural integrity appears to be
 compromised. The grating on top of the cross bars appears to be unsafe to walk
 on.
- 2. Both plants do not have some type of safety mechanism in place, such as grating over top the aeration basins nor is there any hand rails/guards rails around these basins for the safety of personnel while conducting routine duties.
- 3. Plant #2's clarifier had a dark murky appearance to it indicating operational issues.

Wilmington-Chiles WWTP (2 wwtp's):

- 1. Both plants are showing signs of major rust and deterioration.
- 2. The grass and weeds surrounding the wwtp's, lagoons, and chlorine contact chamber have over grown and needs to be cut.

Periodic Compliance Inspection

Timberland WWTP:

- 1. The grass and weeds surrounding the lagoon have over grown and needs to be cut
- 2. The bar screen has vegetation growth along with sludge deposits and rags and/or debris.
- 3. On top of the clarifier is a layer of duckweed indicating operational issues.

Since the last inspection in 2015, Mr. B.G. Waid, the original owner, passed away and his son, Brian Waid, inherited the three wastewater treatment plants. Mr. Waid is in the process of transferring at least two of the three wastewater treatment plants to Paducah McCracken County Joint Sewer Agency (JSA).

A transfer agreement was made and entered into the day of July 30, 2018 by Paducah McCracken County JSA and JoAnn Estates Utilities, Inc. This agreement is for JoAnn Estates Utilities, Inc. to transfer two (JoAnn Estates wwtp and Wilmington-Chiles wwtp) of their three wwtp's to JSA. (See attachment B) The utility states the bidding process for the transfer project has begun and believed that the transfer of these two plants should take place sometime by spring of 2019.

Periodic Compliance Inspection

JoAnn Estates WWTP - Plant #1 (Rt side of pix) Plant #2 (left side of pix)



Gap between the fence post and gate



Periodic Compliance Inspection

Gate behind the chlorine contact chamber.



Gate behind the chlorine contact chamber has no lock.



Periodic Compliance Inspection

JoAnn Estates WWTP - Plant #1



Plant #2



Periodic Compliance Inspection

Plant 2 metal degradation



Wilmington - Chiles WWTP



Periodic Compliance Inspection

Plant #1 (on the left) Plant #2 (on the right)



Plant #2 aeration basin



Periodic Compliance Inspection

Plant #1 aeration basin



Plant #2 has a leak at the effluent pipe that leads to one of the lagoons. This leak is before any type of disinfecting takes place.



Periodic Compliance Inspection

Closer view of leak





Periodic Compliance Inspection

Chlorine Contact Chamber



Timberland WWTP



Periodic Compliance Inspection



Bar Screen with vegetation and sludge. Grating appears unsafe to walk on.



Periodic Compliance Inspection

Clarifier



Chlorine Contact Chamber – Leak



Periodic Compliance Inspection

Leak by-passing the chlorine contact chamber



Leak



JoAnn Estates Utilities, Inc.

Periodic Compliance Inspection

Comment: During this periodic regulatory compliance inspection, it was not possible to review/discuss every record relating to all Commission requirements. Therefore, in some instances the results contained in this report are indicative of those items inspected and reviewed on a sample basis.

Report by: Date: October 5, 2018

Brian L. Rice Utility Inspector

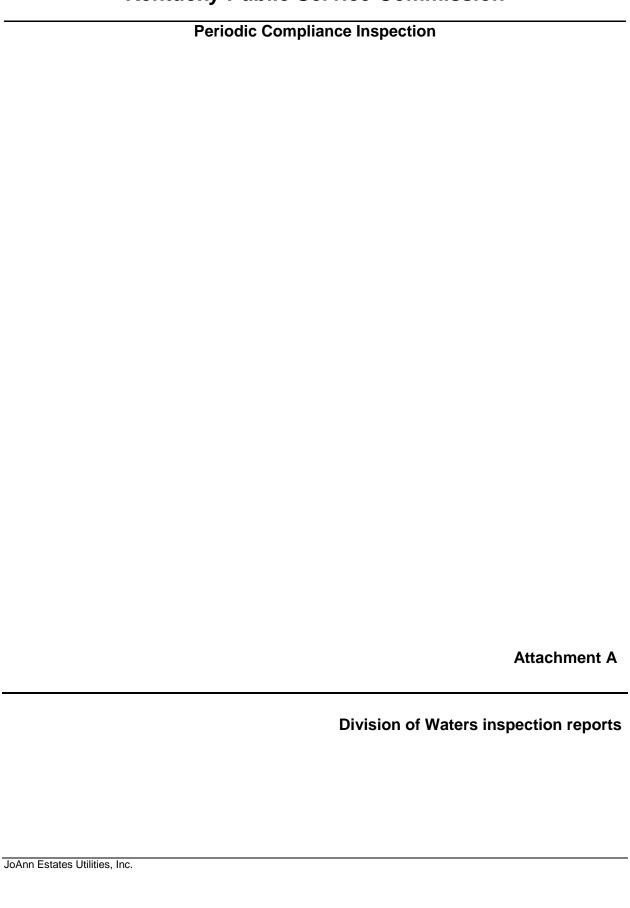
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Kentucky Public Service Commission

Periodic Compliance Inspection

Attachment(s):

- A. Division of Waters inspection reports
- **B.** Transfer Agreement Contract



Energy and Environment Cabinet Department for Environmental Protection Division of Water

Wastewater Inspection Report

AI ID: 3047 AI Type: RESIDENCE- Subdivision (nec)

AI Name: Joanne Estates Subd AI Address: Connie Sue Dr

City: Paducah, State: Kentucky Zip: 42001

County: McCracken Regional Office: Paducah Regional Office

Latitude: 37.079472 **Longitude:** -88.723667

Site Contact: Todd Teas

Title: Operator Phone #:

Inspection Type: WW Routine-Minor Mun Activity #: CIN20180002

Inspection Start Date: August 28, 2018 Time: 10:43 AM End Date: August 28, 2018 Time: 11:43 AM

Site/Permit ID: KY0045250

Lead DEP Investigator: Benjamin Allen

Persons Interviewed: Todd Teas

General Comments:

This routine inspection was conducted to observe compliance with KPDES permit # KY0045250. The facility grounds were walked, the treatment plant and lagoon was observed. The facility does have a lockable fence around it, however the chain to lock the gate is not secure. Mechanically, the plants appeared to be operating properly. Mr. Todd Teas the certified operator was not present during this inspection. The contact chamber was observed with chlorination tablet in the chamber. The chamber is in need of repairs, the walls are deteriorating water coming from the lagoon into the chamber is cloudy and grey. Dechlorination is conducted by a floater containing sodium sulfate tablets. The effluent was observed at the discharge in to the creek, it appeared cloudy and grey. There were violations documented during this inspection. This facility is in the process of a permit renewal, a permit draft has been completed. This package plant is part of a regionalization program to be closed and the collection system tied into The Joint Sewer Agency by the end of 2019. If there are any questions regarding this inspection please contact the Paducah Regional Office at 270-898-8468.

Overall Compliance Status: Out of Comp- Viol documented

Investigation Results

SI: AIOO3047 SI Description: Inspector Comment:

Requirement: Does the facility hold the proper KPDES permit?. [401 KAR 5:055 Section 2]

Compliance Status: C-No Violations observed

Comment: KPDES permit # KY0045250 became effective on August 1, 2012 and shall expired at midnight, July 31, 2017. This package plant is part of a large project of regionalization, eliminating this plant and adding collection system to Paducah Joint Sewer Agency. The project is waiting for funding, and is planned to be completed early spring 2019.

The plant is in the process of a Permit renewal until the plant can be taken over. A draft permit has been completed.

Requirement: Have all required permits been obtained from the Division of Water prior to the construction or

modification of the facility? [401 KAR 5:005 Section 1]

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the facility being operated under the supervision of a properly certified operator? [401 KAR 5:010

Section 1]

Compliance Status: C-No Violations observed **Comment:** Todd Teas Certified operator through 2019.

Requirement: Is the collection system under the primary responsibility of an individual who holds an active collection system certification at the level appropriate for the size of the treatment facility receiving the waste? [401 KAR 5:010 Section 2]

Compliance Status: C-No Violations observed

Comment:

Requirement: Does the permittee retain records of all monitoring information including: the date, exact place, and time of sampling or measurements; the name of the individual who performed the sampling or measurements; the dates and times analyses were performed; the name of the individual who performed the analyses; the analytical techniques or methods used; the results of the analyses; all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation; copies of all reports required by this permit; and records of all data used to complete the application for this permit, for the period required by the cabinet and at a minimum of at least three (3) years from the date of the sample, measurement, report, or application? [401 KAR 5:065 Section 2(1)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the facility required to prepare and implement a groundwater protection plan (GPP) as specified in regulation 401 KAR 5:037? If yes, does the facility have a GPP? [401 KAR 5:037 Section 3]

Compliance Status: E-Not Evaluated

Comment:

Requirement: Is the permittee reporting monitoring results to the cabinet at the intervals specified in the permit? [401 KAR 5:065 Section 2(1)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Are the monitoring results reported to the cabinet on a Discharge Monitoring Report (DMR)? [401 KAR 5:065 Section 2(1)]

Compliance Status: C-No Violations observed

Comment:

Requirement: If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR Part 136 or as specified in the permit, are the results of this monitoring included in the calculation and reporting of the data submitted in the DMR? [401 KAR 5:065 Section 2(1)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Are the calculations for all limitations which require averaging of measurements utilizing an arithmetic mean unless otherwise specified by the Cabinet in the permit? [401 KAR 5:065 Section 2(1)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the permittee in compliance for the reporting of spills, bypasses, and non-compliance according 401 KAR 5:065 Section 2(1)

Compliance Status: C-No Violations observed

Comment:

Requirement: Did the facility notify the Division of Water by the most rapid means available whenever, by reason of emergency or accident, a spill or discharge occurs which results in pollution of the waters of the Commonwealth? [401 KAR 5:015 Section 2]

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the facility being properly operated and maintained as specified in regulation 5:065? This includes: (a) proper operation and maintenance of all facilities, systems of treatment and control, and related appurtenances which are installed or used by the permittee to achieve compliance with permit conditions;

(b) proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures;

(c) this provision also requires the

operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. [401 KAR 5:065 Section 2(1)]

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Compliance Status: D-Out of Compliance-Violations Documented

Comment: The facility is not being properly operated and maintained as required. The Chlorine contact chamber water is cloudy and milky and is discharging to the creek.

Requirement: Are the disinfection unit(s) maintained and operated properly to allow for compliance with permit conditions? [401 KAR 5:005 Section 11]

Compliance Status: D-Out of Compliance-Violations Documented

Comment: The facility has failed to properly maintain and / or operate the disinfection unit. The chlorine contact chamber is eroding and needs repairs, water is cloudy coming from the lagoon into the chamber.

Requirement: Is a source of water provided for cleanup? If potable water is used, is a backflow preventor installed to protect the water supply? [401 KAR 5:005 Section 10(6)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Has fencing with a lockable gate been installed around the wastewater treatment plant? [401 KAR 5:005 Section 10(7)]

Compliance Status: I-No Violations obs-but impending viol trends obs

Comment: The facility has failed to install fencing with a lockable gate around the wastewater treatment plant site. There is a gate and make shift fence. how ever the chain to lock the gate is not secured.

Requirement: Has an all-weather access road been installed to allow access to the wastewater treatment plant? Is the road adequately maintained to allow access to the facility for operation and maintenance activity? [401 KAR 5:005 Section 10(8)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Sewage sludge. Did the facility meet the requirements governing the disposal of sewage sludge from publicly owned treatment works, in accordance with 40 CFR Part 503? [401 KAR 5:065 Section 2(4)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the effluent in compliance with KPDES permit limitations? Do the Discharge Monitoring Reports indicate KPDES permit violations? [401 KAR 5:065 Section 2(1)]

Compliance Status: E-Not Evaluated

Comment:

Requirement: Are samples taken in compliance with the monitoring requirements and taken at the following location(s): nearest accessible point after final treatment, but prior to actual discharge or mixing with receiving waters? Are the samples representative of plant flow? Are flow proportioned samples obtained when required by the KPDES permit? Are grab samples collected according to the KPDES permit requirements? Are composite samples collected and analyzed according to the KPDES permit conditions? Are samples collected according to KPDES permit requirements? [401 KAR 5:065 Section 2(1)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Are the facility sample collection procedures adequate? Are the samples collected in proper containers, preserved, and refrigerated properly? Are all samples analyzed within the allowed holding times? [401 KAR 5:065 Section 2(1)]

Compliance Status: C-No Violations observed

Comment:

Requirement: Have pollutants entered the waters of the Commonwealth? [KRS 224.70-110]

Compliance Status: I-No Violations obs-but impending viol trends obs

Comment: The receiving stream was under low flow conditions at the time of this inspection. The stream was relatively clear upstream the cloudy discharge was coming from the outfall. If the plants continue to be poorly maintained, then the stream is likely to become degraded.

Requirement: Have surface waters been aesthetically or otherwise degraded? [401 KAR 10:031 Section 2]

Compliance Status: I-No Violations obs-but impending viol trends obs

Comment: The receiving stream was under low flow conditions at the time of this inspection. The stream was relatively clear upstream the cloudy discharge was coming from the outfall. If the plants continue to be poorly maintained, then the stream is likely to become degraded.

Documentation

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 □ Photos taken □ Documents obtained from facility □ Samples taken by outside source □ Request for Submission of Documents 		 ☐ Record of visual determination of opacity ☐ Samples taken by DEP ☐ Regional office instrument readings take ☐ Other documentation 			
Inspector:		E-Signed by Benjamin Allen VERIFY authenticity with e-Sign			
Date: August 29, 2 Received By: Delivery Method: USPS	2018 Title:	Date:			

Energy and Environment Cabinet Department for Environmental Protection Division of Water

Wastewater Inspection Report

AI ID: 3080 AI Type: RESIDENCE- Subdivision (nec)

AI Name: Wilmington Chiles Estate Subd

AI Address: Craven Dr & Cairo Rd

City: Paducah, State: Kentucky Zip: 42001

County: McCracken Regional Office: Paducah Regional Office

Latitude: 37.090103 **Longitude:** -88.737173

Site Contact: Todd Teas

Title: Operator Phone #:

Inspection Type: WW Routine-Min Nmun **Activity #:** CIN20170001

Incident IDs:

Inspection Start Date: November 3, 2016 Time: 12:00 AM End Date: November 3, 2016 Time: 12:00

AM

Site/Permit ID: KY0078336

Lead DEP Investigator: Benjamin Allen

Persons Interviewed: Todd Teas

General Comments: On October 26, 2017, a routine Waste Water inspection was conducted at Wilmington Chiles WWTP located at Craven Dr. West Paducah, KY. This facility is operating under permit # KY0078336. During this inspection the facility grounds were walked and I spoke with the operator Todd Teas, via telephone. The Plant was operating however the lift station that feeds the plant was not. There was a large amount of grease on the top of the water and water was leaking out of the side of the lift station. No pumps were running. I contacted Mr. Teas, he came out that afternoon pulled the pump and removed a mop head that had caused the pump to fail. I returned on October 27, and the lift station was back down to normal levels and operating properly. This effluent was also observed it appeared turbid, there is aeration in the chlorine contact Chamber and de chlorination area. The lagoons were observed and are both covered in duckweed. This facility is under an Agreed Order (Case No. DOW 130133). Please note that stipulated penalties, as explained in the Agreed Order, may be considered for violations of the KPDES permit or the Agreed Order. If there are any questions regarding this inspection please contact the Paducah Regional Office at 270-898-8468.

Overall Compliance Status: No Viol Obs- impend viol trend

Investigation Results

SI: AIOO3080 SI Description: Inspector Comment:

Requirement: Does the facility hold the proper KPDES permit?. [401 KAR 5:055 Section 2]

Compliance Status: C-No Violations observed

Comment:

Requirement: Have all required permits been obtained from the Division of Water prior to the construction or

modification of the facility? [401 KAR 5:005 Section 1]

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the facility being operated under the supervision of a properly certified operator? [401 KAR 5:010

Section 1]

Compliance Status: C-No Violations observed

Comment: Todd W Teas, WW Treatment III, #13178.			
Requirement: Is the collection system under the primary responsibility of an individual who holds an active			
collection system certification at the level appropriate for the size of the treatment facility receiving the waste? [401]			
KAR 5:010 Section 2]			
Compliance Status: C-No Violations observed			
Comment:			
Requirement: Is the permittee in compliance for the reporting of spills, bypasses, and non-compliance according 401			
KAR 5:065 Section 2(1)			
Compliance Status: C-No Violations observed			
Comment:			
Requirement: Is the facility being properly operated and maintained as specified in regulation 5:065? This includes:			
(a) proper operation and maintenance of all facilities, systems of treatment and control, and related appurtenances			
which are installed or used by the permittee to achieve compliance with permit conditions;			
(b) proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance			
procedures; (c) this provision also requires the			
operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the			
operation is necessary to achieve compliance with the conditions of the permit. [401 KAR 5:065 Section 2(1)]			
Compliance Status: I-No Violations obs-but impending viol trends obs			
Comment: The facility is not being properly operated and maintained as required. The Chlorine contact chamber			
walls are deteriorating. The lift station was over flowing and the pump was clogged. Mr. Teas came out and fixed the			
pump that evening and the next day i returned the lift station was operating properly. It appears the plant is also			
leaking from the clarifier			
Requirement: Are the disinfection unit(s) maintained and operated properly to allow for compliance with permit			
conditions? [401 KAR 5:005 Section 11]			
Compliance Status: C-No Violations observed			
Comment: The chlorine contact chamber was being aerated and was turbid. Chlorine and dechlor tablets were			
present.			
Requirement: Have pollutants entered the waters of the Commonwealth? [KRS 224.70-110]			
Compliance Status: I-No Violations obs-but impending viol trends obs			
Comment: The final effluent discharges to a small shallow pool just beyond the chlorine contact chamber and may			
not flow to the receiving stream through a pipe. The receiving stream was not observed during this inspection;			
however, the discharge to the ditch was slightly turbid.			
Requirement: Have surface waters been aesthetically or otherwise degraded? [401 KAR 10:031 Section 2]			
Compliance Status: I-No Violations obs-but impending viol trends obs			
Comment: The final effluent discharges to a small shallow pool just beyond the chlorine contact chamber and may			
not flow to the receiving stream through a pipe. The receiving stream was not observed during this inspection;			
however, the discharge to the ditch was slightly turbid.			
Documentation			
Photos taken Record of visual determination of opacity			
☐ Documents obtained from facility ☐ Samples taken by DEP			
Samples taken by outside source Regional office instrument readings taken			
Request for Submission of Documents Other documentation			
☐ Request for Submission of Documents ☐ Other documentation			
Inspector:			
E-Signed by Benjamin Allen ?			
VERIFY authenticity with e-Sign			
Dates October 21 2017			
Date: October 31, 2017			
Received By: Title: Date:			
Delivery Method: USPS			

Energy and Environment Cabinet Department for Environmental Protection Division of Water

Wastewater Inspection Report

AI ID: 3070 AI Type: RESIDENCE- Subdivision (nec)

AI Name: Timberland Subd AI Address: Timberland Rd

City: Heath, State: Kentucky Zip: 42086

County: McCracken Regional Office: Paducah Regional Office

Latitude: 37.07756 **Longitude:** -88.77024

Site Contact: Todd Teas **Title:** Operator **Phone** #:

Inspection Type: WW CEI-Minor Mun Activity #: CIN20180001

Inspection Start Date: January 23, 2018 Time: 09:11 AM End Date: January 23, 2018 Time: 09:11 AM

Site/Permit ID: KY0083755

Lead DEP Investigator: Benjamin Allen

Persons Interviewed: Todd Teas

General Comments: On January 23, 2018, a Compliance Evaluation inspection was conducted at Timberland WWTP, located in West Paducah, KY. This inspection was conducted to observe compliance with KPDES Permit No. KY0083755. During this inspection the plant was in operation. The Aeration basin had good color and mixing, the return sludge and clarifier were operating properly and looked well maintained. The discharge to the lagoon appeared clear and free of solids. The levee around the lagoon is need of repair as there are holes from animals as well as low spot by the contact chamber. The levee is barely over the water line potential overflow and bypass of disinfection at this spot. Effluent was observed, photos were taken on site. There is significant beaver activity around the plant and lagoon, several large trees have fallen onto the plant or lagoon. Also the creek where the discharge enters has been dammed up. Mr. Teas is aware of the issue and working on possible solutions. Mr. Teas, the certified operator, presented his license and field certification to perform field analysis. Also chain of custody forms for sampling were observed. Field meter calibration logs and sampling logs were always reviewed. If you have any questions regarding this inspection please contact the Paducah Regional Office at 270-898-8468.

Overall Compliance Status: Out of Comp- Viol documented

Investigation Results

SI: AIOO3070 SI Description: Inspector Comment:

Requirement: Does the facility hold the proper KPDES permit?. [401 KAR 5:055 Section 2]

Compliance Status: C-No Violations observed **Comment:** KY0083755 issued on November 1, 2014

Requirement: Is the facility being operated under the supervision of a properly certified operator? [401 KAR 5:010

Section 1]

Compliance Status: C-No Violations observed **Comment:** Todd W Teas, WW Treatment III, #13178.

Requirement: Is the collection system under the primary responsibility of an individual who holds an active collection system certification at the level appropriate for the size of the treatment facility receiving the waste? [401]

KAR 5:010 Section 2]

Compliance Status: C-No Violations observed **Comment:** Jimmy E Waid, WW Collection II, #19366.

(a) proper operation and maintenance of a which are installed or used by the permitte (b) proper operation and maintenance also procedures; operation of back-up or auxiliary facilities operation is necessary to achieve complian Compliance Status: D-Out of Compliance Comment: The facility is not being proportion contact chamber is eroding and lagoon conactivity around the lagoon and plant. Severally, which is the property of th	Ill facilities, system ee to achieve composition of the composition of the condition of the	laboratory controls, and appropriate quality assurance (c) this provision also requires the s which are installed by a permittee only when the ions of the permit. [401 KAR 5:065 Section 2(1)]
	s) maintained and o	perated properly to allow for compliance with permit
conditions? [401 KAR 5:005 Section 11] Compliance Status: C-No Violations of	oserved	
		nt and the tank was being aerated. Turbid water was
Requirement: Have pollutants entered the		am sealant has been used to seal the chamber.
Compliance Status: C-No Violations of		illilloliweatur: [KKS 224.70-110]
Comment: The discharge was clear and		is in operation.
Requirement: Have surface waters been Compliance Status: C-No Violations of Comment:		nerwise degraded? [401 KAR 10:031 Section 2]
Documentation ☐ Photos taken ☐ Documents obtained from facili ☐ Samples taken by outside source ☐ Request for Submission of Docu	e	 □ Record of visual determination of opacity □ Samples taken by DEP □ Regional office instrument readings taken □ Other documentation
Inspector: E-Signed by Benjamin Allen VERIFY authenticity with e-Sign		
Date: January 30, 2018		
Received By: Delivery Method: USPS	Title:	Date:
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TRANSFER AGREEMENT

THIS TRANSFER AGREEMENT made and entered into this 30 day of 3018, by and between PADUCAH MCCRACKEN COUNTY JOINT SEWER AGENCY ("JSA") and JOANN ESTATES UTILITIES, INC., ("Joann Estates").

WITNESETH:

WHEREAS, Joann Estates desires to transfer the wastewater collection facilities for Joann Estates and Wilmington Chiles subdivisions in McCracken County, Kentucky to JSA and JSA has agreed to accept such facilities in accordance with the terms and conditions of this agreement.

NOW, THEREFORE, for valuable consideration, the legal adequacy and sufficiency of which is hereby acknowledged by all parties, the parties do covenant and agree as follows:

1. TRANSFER AND ACCEPTANCE.

- 1.1 <u>Description of Agreement.</u> Subject to the terms and conditions of this Agreement, Joann Estates shall sell and transfer unto JSA and JSA shall purchase and receive from Joann Estates, the wastewater collection facilities and equipment (the "Facilities") serving the Joann Estates and Wilmington Chiles subdivisions of McCracken County, Kentucky, including the sanitary sewer lines, force mains, equipment, structures, easements, permits and licenses used to collect and transport wastewater in the Joann Estates and Wilmington Chiles subdivisions, with all appurtenances and rights and privileges arising therefrom or relating thereto (the "Assets"), but specifically excluding the package treatment plant, the lagoon property, any accounts receivable, any customer deposits, and any contracts, contract obligations, responsibilities or liabilities of Joann Estates, none of which are assumed or shall be assumed by JSA.
- 1.2 <u>Title to be Delivered</u>. Joann Estates shall transfer marketable fee simple title to the Assets to JSA. The Assets shall not be subject to any lien or adverse interest of another except as may be acceptable to JSA. JSA may have a title examination performed on the Assets at its cost.
- 1.3 <u>Documents of Transfer</u>. Joann Estates shall execute all documents of transfer, including appropriate and recordable deeds of conveyance and bills of sale. All documents of transfer shall be duly authorized by appropriate resolution of Joann Estates.

2. REPRESENTATIONS AND WARRANTIES OF JOANN ESTATES.

- 2.1 <u>Organization and Authority</u>. Joann Estates represents and warrants to JSA that Joann Estates is a duly organized and legal corporation in existence under laws of the Commonwealth of Kentucky and has absolute authority to execute and deliver the documents regarding the transactions contemplated by this Agreement.
- 2.2 <u>Merchantable Title</u>. Joann Estates represents and warrants to JSA that it has full and complete merchantable title to its real and personal properties. JSA may waive any defect at its option.
- 2.3 <u>Condition of Facilities and Operations</u>. Joann Estates represents and warrants to JSA that Joanne Estates' facilities and operations have been and are in compliance with all federal, state, and local

law, as well as any permits issued by the Kentucky Departments for Environmental Protection, Division of Water, with the exception of those violations identified on Schedule 2.3 attached hereto.

2.4 <u>Adverse Proceeding</u>. Joann Estates represents and warrants to JSA that Joann Estates' is not presently a party to any judicial or administrative proceeding, nor has it knowledge of any threatened or imminent judicial or administrative proceeding.

3. OBLIGATIONS OF JOANN ESTATES PRIOR TO CLOSING.

- 3.1 Obligations to Continue Management of Facilities. From and after the date of the execution of this Agreement to date of closing, Joann Estates shall continue the management, operation, and maintenance of the Assets in a sound and reasonable manner and in accordance with wastewater collection and treatment best practices. Additionally, Joann Estates shall continue to collect its charges from its customers in the usual and customary manner and shall maintain good operating and accounting records.
- 3.2 <u>Prohibition Against Further Liability and Expenditures</u>. From and after the date of the execution of this Agreement to date of closing, Joann Estates shall not incur any additional liability or debt nor make any expenditure of funds unless such liability, debt, or expenditure is in the ordinary course of business and reasonably necessary to the continued operations of Joann Estates, or Joann Estates' compliance with its obligations.
- 3.3 <u>Information to be Disclosed to JSA</u>. Joann Estates shall provide to JSA full and complete access to all and copies of files related to the Assets, records, documents, discharge monitoring reports, maps and writings, and JSA may request that Joann Estates personnel be available to JSA to be interviewed about operational matters, or otherwise provide information regarding the operation of the Assets.
- 3.4 Access to Real and Personal Property. Joann Estates shall provide to JSA full and complete access to the real and personal properties pertaining to the Assets. JSA shall have the right to fully inspect same, and perform any test or study as relates to same. Joann Estates shall identify to JSA any known defects or needs of imminent repair or replacement regarding any of the Assets. Additionally, Joann Estates shall identify and provide to JSA any manufacturer's warranties, documents of purchase, service agreements or other written representations as relate to any of the Assets.
- 3.5 Approvals. Following the execution of this Agreement the parties shall file a joint petition with the Kentucky Public Service Commission seeking the approval of the transfer contemplated in this agreement. JSA shall pay the normal and customary attorney's fees and costs associated with the preparation and prosecution of such petition. Joann Estates shall pay the attorney's fees and costs associated with providing any post approval reports to the Kentucky Public Service Commission. Additionally, JSA may initiate at its cost, and Joann Estates shall cooperate in, he appropriate proceedings before any state or federal agencies for the consent and approval of the transactions contemplated by this Agreement.

4. OBLIGATIONS OF JSA PRIOR TO CLOSING.

4.1 <u>Investigation</u>. From and after the date of execution of this Agreement, JSA may immediately commence its due diligence and inspection of the Assets, including the physical assets and all documents and records relating to the Assets, and of the document and records relating to the financial

worth and condition of Joann Estates. JSA may employ, at its expense, any engineer, accountant, attorney, or any other expert to perform any part of the investigation and inspection to be performed by JSA.

- 4.2 <u>Approvals</u>. Following the execution of this Agreement the parties shall file a joint petition with the Kentucky Public Service Commission seeking the approval of the transfer contemplated in this agreement. JSA shall pay the normal and customary attorney's fees and costs associated with the preparation and prosecution of such petition. Additionally, JSA may initiate at its cost, and Joann Estates shall cooperate in, the appropriate proceedings before any state or federal agencies for the consent and approval of the transactions contemplated by this Agreement.
- 4.3 <u>Documents of Transfer</u>. JSA shall bear the cost of the preparation of all documents of transfer, including any deeds of conveyance and bills of sale which shall be available for inspection by Joann Estates prior to the time of closing.

5. CONDITIONS PRECEDENT TO TRANSFER AND ACCEPTANCE.

- 5.1 <u>Conditions Precedent</u>. Notwithstanding the foregoing transfer and acceptance, this sale and transfer and purchase and acceptance shall be subject to the following conditions precedent:
- 5.1.1 Title to the real and personal property transferred herein shall be marketable fee simple title free and clear of all liens or adverse interests except those acceptable to JSA;
- 5.1.2 The transfer and assignment shall be fully and finally approved by applicable state and federal agencies, specifically including the Kentucky Public Service Commission;
- 5.1.3 The assets to be received or accepted by JSA as provided for herein are acceptable to JSA at its sole and absolute discretion
- 5.1.4 The Assets to be transferred herein shall be in a working and operable condition and good state of repair;
- 5.1.5 All other representations and warranties of Joann Estates to JSA have been fully satisfied and complied with; and
- 5.2 <u>Satisfaction of Conditions Precedent</u>. On the date of closing, the conditions precedent shall be fully satisfied and complied with. In the event any one of the aforesaid conditions precedent is not fully satisfied and complied with, JSA, at its option, may terminate this Agreement, and upon such termination, the Agreement shall be of no further legal force and effect. Upon such termination, the Joann Estates shall not be liable to JSA in any manner whatsoever.

6. CLOSING.

6.1 <u>Date and Place of Closing</u>. Upon JSA's determination that all conditions precedent have been fully satisfied and complied with, JSA shall give written notice of such fact to Joann Estates. Closing shall take place as soon as practicable following the date of said notice, but in no event shall it be more than 30 days from notice.

- 6.2 <u>Documents of Transfer</u>. At the time of closing, Joann Estates shall tender to JSA properly executed documents of transfer including appropriate resolutions of Joann Estates authorizing the transfer and appropriate deeds of conveyance and bills of sale. Additionally, at the time of transfer, Joann Estates shall tender to JSA all records and documents related to the Assets including, but not limited to customer accounts and files, engineering plans, financial statements, audits, easements, contracts with customers, etc.
- 6.3 <u>Notice of Closing to Joann Estates Customers</u>. In the event there is any requirement that notification of final transfer of Joann Estates' assets and property be given to the customers of Joann Estates by order of the Kentucky Public Service Commission or otherwise, Joann Estates agrees to provide such notification at its cost and expense.

7. OBLIGATIONS OF JOANN ESTATES' SUBSEQUENT TO CLOSING.

Immediately subsequent to closing, Joann Estates shall utilize its best efforts to assist JSA in transferring the customer accounts and files to JSA and to otherwise cooperate and assist JSA to finalize the transfer of property and the assumption of operation of the Assets by JSA. Joann Estates shall not do any act or omit to perform any act which is adverse or inimical to this Agreement.

8. POST-CLOSING OBLIGATIONS OF JSA.

From and after closing, JSA shall assume full control of the operation of the Assets and provide wastewater collection and treatment services to the Joann Estates and Wilmington Chiles subdivisions of McCracken County, Kentucky in accordance with its policies and procedures, as amended from time to time.

9. MISCELLANEOUS.

- 9.1 <u>Entire Agreement.</u> This Agreement represents the entire agreement by and between the parties hereto, and all prior promises, representations, covenants and understandings are fully merged herein. There are no other promises, terms, conditions, or obligations other than those specifically contained herein.
- 9.2 <u>Captions</u>. The captions appearing in this Agreement have been asserted for the purpose of convenience and ready reference. They do not purport to, and shall not be deemed to, define, limit, or extend the scope or intent of the clauses to which they pertain.
- 9.3 <u>Applicable Law-Venue</u>. It is mutually understood and agreed that this Agreement shall be governed by the laws of the Commonwealth of Kentucky as to both interpretation and performance. The venue of any legal action relating to this Agreement or the transactions contemplated herein shall be in the court of appropriate jurisdiction in McCracken County, Kentucky or the U.S. District Court for the Western District of Kentucky, Paducah Division.
- 9.4 <u>Binding Effect</u>. This Agreement shall bind and inure to the benefit of the parties hereto, and each of their respective successors and assigns.

- 9.5 <u>Assignment</u>. This Agreement, any interest herein, or any claim arising hereunder, shall not be transferred by either party without the prior written consent of the other party. Any such assignment shall be void.
 - 9.6 Notices. Notice to JSA and Joann Estates shall be given at the following addresses:

JOANN ESTATES: 6500 Highway 60 West

Paducah, Kentucky 42001

JSA: 621 Northview Street

Paducah, Kentucky 42001

9.7 <u>Severability</u>. The parties agree that if a court of competent jurisdiction holds any one or more of the paragraphs or subparagraphs of this Agreement to be invalid or ineffective for any reason, any such paragraph or subparagraph will be deemed separate from the remainder of this Agreement and will not affect the validity and enforceability of the remaining provisions.

IN WITNESS WHEREOF, the parties hereto have set their hands on the date first above written.

PADUCAH MCCRACKEN COUNTY JOINT SEWER AGENCY

By:

JOHN HODGES, EXECUTIVE DIRECTOR

JOANN ESTATES UTILITIES, INC.

By:

BRIAN WAID, PRESIDENT

STATE OF KENTUCKY) COUNTY OF McCRACKEN)
Subscribed and sworn to before me this 30th day of July, 2018, by John Hodges, Executive Director, on behalf of Paducah McCracken County Joint Sewer Agency, on behalf of said entity.
My commission expires: April 14, 2022
NOTARY PUBLIC, STATE AT LARGE
Notary ID# <u>598755</u>
STATE OF KENTUCKY) COUNTY OF McCRACKEN)
Subscribed and sworn to before me this 45th day of 4pril , 2018, by Brian Waid, President of Joann Estates Utilities, Inc., on behalf of said entity.
My commission expires: April 14, 2022.
NOTARY PUBLIC, STATE AT LARGE
Notary ID# :598755

Andy Beshear Governor

Rebecca W. Goodman Secretary Energy and Environment Cabinet



Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Kent A. Chandler Chairman

Mary Pat Regan Commissioner

August 2, 2022

Josiah Cox CEO Central States Water Resources 1630 Des Peres Rd., Suite 140 Des Peres, MO 63131

Re: Periodic Wastewater Inspection

Bluegrass Water Utility Operating Company, LLC - Randview

Graves County, KY

Dear Mr. Cox:

Public Service Commission staff performed a periodic inspection of the Bluegrass Water Utility Operating Company, LLC – Randview wastewater system located in Graves County, KY on April 26, 2022, reviewing utility operations and management practices pursuant to Commission regulations. The report of this inspection is enclosed with this letter.

Based on the inspector's observations, six deficiencies were identified:

- 1. The first lagoon is not enclosed within a fence. This is contrary to 807 KAR 5:071, Section 7(1).
- 2. There are no signs around the first lagoon indicating the nature of the facility and advising against trespassing. This is contrary to 807 KAR 5:071, Section 7(1).
- 3. Parts of the fence around the second lagoon is either damaged or broken and other areas of the fence are laying on the ground. This is contrary to 807 KAR 5:071, Section 7(1).
- 4. There are no signs around the second lagoon indicating the nature of the facility and advising against trespassing. This is contrary to 807 KAR 5:071, Section 7(1).
- 5. There's no access road to the second lagoon. This contrary to 807 KAR 5:071, Section 7(1).
- 6. Vegetation is growing in the lagoon, on the banks and around the area of the lagoon. This is contrary to 807 KAR 5:071(1).



Periodic Compliance Inspection

Utility: Bluegrass Water Utility Operating Company, LLC -	Randview			
Utility's Principal office location: 1630 Des Peres Road,	Suite 140 S	t Louis, MO	O 63131	
Utility representative during inspection: Jake Freeman, A	<u>Arthur Faiel</u>	lo and Aar	on Silas	
Counties served: Graves				
Customers: <u>56</u>				
Investigator: Brian L. Rice				
Date(s) of inspection: April 26, 2022				
Date(s) of last inspection: April 21, 2021				
Deficiencies noted during the last inspection: No deficie	encies notec	l during thi	s inspection	
Have deficiencies been corrected since last inspection?	? Yes □	No 🗌	N/A ⊠	
If no, provide a response as to why these deficiencies have not been addressed.				
General Questions				
Treatment Facility: Collection System:	Yes ⊠ Yes ⊠	No 🗌 No 🗍	N/A	
Utility Information Total number of Employees: 0 Number of Office Employees: 0				
Note: The Company is comprised of contracted operations,	, billing, and	customer	service.	
Does the utility have its own maintenance staff?	Yes 🗌	No 🛚	N/A 🗌	
If not, give the name the person(s) doing the work:				
Operation and Maintenance is contracted out to Midwest W	ater Operat	ions.		
Bluegrass Water Utility Company, LLC - Randview			Page 1	

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	Yes 🗍	No 🖂	N/A ⊠
Mailing it to each customer once each year; or:	100	140	
maning it to each oustomer once each year, or.	Yes 🗍	No 🗆	N/A 🏻
Provide a place on each bill for a customer to ind			
the applicable rates:	Yes 🖂	No 🗌	N/A
the applicable rates.	169	NO	N/A 🗀
Note: Due to the nature of the bills, the flat rate found on	the hill is the	rate schedule	e associated with
the service areas. Additionally, the bills have multiple opti			
billing inquiries including questions regarding the rate sch		ing the other	ii alloy havo ally
simily inquiries including questions regarding the rate soil	<u>caaic.</u>		
Section 8. Deposits.			
decitor of peposits.			
Is the utility requiring a minimum cash deposit or ot	her guarante	from custo	mars to secure
payment of bills?	Yes 🗌	No 🖂	N/A
payment of bills:	163		IVA L
Section 10: Customer Complaints to the Utility			
Upon complaint to a utility by a customer at the utility			
the utility make a prompt and complete investigation	ı and advise t	he custome	r of the utility's
findings?	Yes 🔀	No 🗌	N/A
B (b			
Does the utility keep a record of all written complaints			
	Yes 🔀	No 🔙	N/A
Does the record include the following?			
The customer's name and address:	Yes 🔀	No 🔲	N/A
The date and nature of the complaint:	Yes 🔀	No 🔲	N/A
The disposition of the complaint:	Yes 🖂	No 🗌	N/A
Daniel Alexand (1944 - 1944 -			
Does the utility maintain these records for two (2)			
complaint?	Yes 🔀	No 🗌	N/A
If a written complaint or a complaint made in person	at the utility's	office is no	tracelyad door
the utility provide written notice to the customer of h			
commission?	Yes		N/A
Commission?	res	No 💹	N/A
Note: The Company does not maintain a local office, but the	is information	is available v	ia the Company's
website. In the Order associated with Docket 2019-00			
operations without a local office.	101, 110 0011	тисстен арр	OTOG Bladgiado
Sporadorio Mariode a robal offico.			
Does the utility provide the customer with the mailing	address Web	site address	s, and telenhone
number of the commission?	Yes 🖂	No 🗌	N/A
muniber of the Commission?	162	140 L	IN/A L
Bluegrass Water Utility Company, LLC - Randview		P	age 3

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Permit all customers to contact the utility's designated r	epresentativ	e without ch	arge:		
	Yes 🖂	No 🗌	N/A		
Does the utility prominently display in each office open shall post on its Web site, if it maintains a Web site) a se commission, of the customer's rights pursuant to administrative regulation?	ummary, pre	pared and pr	ovided by the		
Note: The Company does not maintain a local office, but this website. In the Order associated with Docket 2019-0010-operations without a local office. Records are kept electroreasonable notice at reasonable hours.	4, the Comm	ission approv	ved Bluegrass'		
Section 20: Access to Property					
Do employees of the utility (whose duties require him to enter the customer's premises) wear a distinguishing uniform or other insignia, identifying them as an employee of the utility, and show a badge or other identification that shall identify them as an employee of the utility? Yes \boxtimes No \square N/A \square					
Section 23: System Maps and Records					
Does the utility have on file at its principal office locat request with the commission a map or maps of suitable or holds itself ready to serve?					
Note: In the Order associated with Docket 2019-00104 methodology of utilizing the Kentucky Infrastructure Author The Company does maintain maps electronically that can be Additionally, the Company utilizes the Kentucky Infrastructure including districts.	ity to comply e filed upon re	with mapping equest with the	requirements. e Commission.		
Is the map or maps available in electronic format as database?	a PDF file o Yes ⊠	or as a digita No 🗌	al geographic N/A 🗌		
Is the following data available on the map or maps?					
Operating districts	Yes	No 🗌	N/A 🖂		
Rate districts: Communities served: Bluegrass Water Utility Company, LLC - Randview	Yes ☐ Yes ⊠	No No Page	N/A 🖂		

Periodic Compliance Inspection

Instruct employees who, in the course of their work, are subject to the hazard of electrical shock, asphyxiation, or drowning, in accepted methods of artificial respiration: Yes \text{No } \text{N/A}
Note: Bluegrass Water has no employees.
Section 26: Inspection of Systems:
(1) A utility shall adopt inspection procedures to assure safe and adequate operation of the utility's facilities and compliance with KRS Chapter 278 and 807 KAR Chapter 5 and shall file these procedures with the commission for review. (2) Upon receipt of a report of a potentially hazardous condition at a utility facility, the utility shall inspect all portions of the system that are the subject of the report. (3) Appropriate records shall be kept by a utility to identify the inspection made, the date and time of inspection, the person conducting the inspection, deficiencies found, and action taken to correct the deficiencies.
Has the utility adopted inspection procedures to assure safe and adequate operation of the utility's facilities and compliance with KRS Chapter 278 and 807 KAR Chapter 5? Yes ⊠ No ☐ N/A ☐
Have these inspection procedures been filed with the commission for review? Yes ☐ No ☒ N/A ☐
Jpon receipt of a report of a potentially hazardous condition at a utility facility, does the utility nspect all portions of the system that are the subject of the report? Yes ☑ No ☐ N/A ☐
Are appropriate records kept by a utility to identify the inspection made, the date and time of nspection, the person conducting the inspection, deficiencies found, and action taken to correct the deficiencies? Yes \square No \square N/A \square
Section 27: Reporting of Accidents, Property Damage, or Loss of Service.
1) Within two (2) hours following discovery each utility, other than a natural gas utility, shall notify the commission by telephone or electronic mail of a utility related accident that results n: (a) Death or shock or burn requiring medical treatment at a hospital or similar medical facility, or any accident requiring inpatient overnight hospitalization.
lluegrass Water Utility Company, LLC - Randview Page 7

Periodic Compliance Inspection

807 KAR 5:011 (Tariffs)

Section 12: Posting tariffs, Administrative Regula	tions, and S	tatutes		
Does the utility display a suitable placard, in large ty are available for public inspection?	pe, that state	s that the ut	ility's tariff and statutes	
Note: The Company does not maintain a local office, I website. In the Order associated with Docket 201 operations without a local office. Records are kept reasonable notice at reasonable hours.	9-00104, the	Commissio	n approved Bluegrass'	
Does the utility provide a suitable table or desk in its may view all effective tariffs?	s office or pla	nce of busine	ess on which the public	
Note: The Company does not maintain a local office, by website. In the Order associated with Docket 2019 operations without a local office. Records are kept reasonable notice at reasonable hours.	9-00104, the	Commissio	n approved Bluegrass'	
Section 13: Special Contracts				
Does the utility have any special contracts that esta contained in its tariff?	blish rates, c Yes []	harges, or co No ⊠	onditions of service not	
If yes, has the utility filed the special contracts with th	e PSC?			
	Yes 🗌	No 🗌	N/A ⊠	
807 KAR 5:071 (Sewage):				
Section 1: General. The purpose of this administ administ administ administ administ administ administ administ administ administrative regulations governing the service Commission.				
Section 4: Information Available to Customers.				
(1) System maps or records. Each utility shall maintain up-to-date maps, plans, or records of its entire force main and collection systems, with such other information as may be necessary to				
Pluagrage Water Hillity Company LLC Bandview			Dage 0	

Periodic Compliance Inspection

(2) Scheduled interruptions. Whenever any utility interruption of its service, it shall notify all custo the time and anticipated duration of the interrupt interruptions shall be made at such hours as will customers.	mers to be	e affected by th never possible,	e interruption stating scheduled	g	
(3) Record of interruptions. Each utility shall kee system. This record shall show the cause of inter taken to prevent recurrence.			•		
is the utility making all reasonable efforts to prevent interruptions of service and when such interruptions occur shall endeavor to reestablish service with the shortest possible delay consistent with the safety of its customers and the public? Yes No No N/A					
If the utility schedules an interruption of service the interruption?	are all cu Yes ⊠	stomers notifie No □	d that are affected b N/A □	У	
PROVIDE DOCUMENTATION DURING INSPECTION	ON IF ANY	′ .			
Does the utility make all reasonable efforts to provide least inconvenience to the customers?	schedule Yes ⊠	interruptions a	nt such hours as wi N/A ☐	II	
Does the utility maintain a record of all interrupt	ions of se	rvice regarding	the following items	?	
	Yes 🖂	No 🗌	N/A		
Cause of interruption	Yes 🛛	No 🗌	N/A		
Date	Yes 🛛	No 🗌	N/A 🗌		
Time	Yes 🛚	No 🗌	N/A 🗌		
Duration	Yes 🔀	No 🔲	N/A		
Remedy	Yes 🔀	No 🔲	N/A		
# Of customers affected	Yes 🔀	No 🔲	N/A		
steps taken to prevent recurrence	Yes 🛚	No 🔲	N/A		
Section 7. Design. Construction, and Operation					
accurate to beginner constitution, and coefficient					

(1) General. The sewage treatment facilities of the sewage utility shall be constructed, installed, maintained and operated in accordance with accepted good engineering practice to assure, as

Periodic Compliance Inspection

Deficiencies

- 1. The first lagoon is not enclosed within a fence. This is contrary to 807 KAR 5:071, Section 7(1).
- 2. There are no signs around the first lagoon indicating the nature of the facility and advising against trespassing. This is contrary to 807 KAR 5:071, Section 7(1).
- 3. Parts of the fence around the second lagoon is either damaged or broken and other areas of the fence are laying on the ground. This is contrary to 807 KAR 5:071, Section 7(1).
- 4. There are no signs around the second lagoon indicating the nature of the facility and advise against trespassing. This is contrary to 807 KAR 5:071, Section 7(1).
- 5. There's no access road to the second lagoon. This contrary to 807 KAR 5:071, Section 7(1).
- 6. Vegetation in and around the lagoon area is not being properly maintained. This is contrary to 807 KAR 5:071(1).

Additional Comments

BW has made the following improvements:

Cleared Vegetation from around the first lagoon. Replaced the old lift station on Mitchell Drive with a new one Repaired a leak in the first lagoon



Randview WWTF
Second lagoon – No access road



Heavy Vegetation



Mitchell Drive Lift Station - Before Replacement



Mitchell Drive Lift Station - After Replacement

RECEIVED APR 11 2023

PUBLIC SERVICE COMMISSION

Ronald Sigers 5940 Majestic Oak Drive Paducah, KY 42003

Kentucky Public Service Commission P.O. Box 615 Frankfort, KY 40602

RE: CONSUMER PROTECTION COMPLAINT REGARDING CENTRAL STATES WATER RSOURCES / BLUEGRASS WATER CASE 2022-00432.

Dear Representative,

After filing a consumer protection complaint regarding Bluegrass Water / Central States Water Resources, Consumer Complaint Investigator II, Heather Napier advised me to contact the Kentucky Public Service Commission in writing to have my objection to the current petition for a rate increase noted in the official record in case 2022-00432. See attached letter.

My complaint is as follows:

According to the Office of the Environmentalist at the Purchase District Health Department in McCracken County, Kentucky; Bluegrass Water was found to be in an environmental violation regarding the failure of a lateral fill line at the end of a sewage lagoon. This violation was discovered by an inspector in September 2022. Bluegrass Water is the current owner/operator of this sewage lagoon pursuant to an acquisition agreement granted in order 2019-00104 by the Kentucky Public Service Commission on 8-14-19. Notice of the violation was sent to Bluegrass Water in October 2022. In 5 months, the health department states Bluegrass Water has done nothing to remedy the environmental violation.

Through the Office of Civil and Environmental Law, the Attorney General has statutory authority under KRS 15.255 to bring legal action to prevent or remedy damage to the environment. Under KRS 15.260, the Attorney General is granted statutory authority to investigate and prosecute cases involving environmental damage.

My complaint involves three issues as follows:

- (1)Reported failure of Central States Water Resources / Bluegrass Water to remedy an environmental violation in McCracken County, Kentucky after receiving notice by the Purchase District Health Department in McCracken County, Kentucky.
- (2) Breach of an acquisition agreement granted by the Kentucky Public Service Commission in order 2019-00104 on 8-14-19.
- (3)Breach of fiduciary duty to customers of Central States Water Resources / Bluegrass Water who pay a costly monthly flaterate for sewer services and citizens of McCracken County, Kentucky at large who may be impacted by the environmental violation.

Ronald Sigers

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