

January 28, 2022

Nicholas Fields
Kentucky Department for Environmental Protection
Division of Enforcement
300 Sower Blvd., 3rd Floor
Frankfort, KY 40601

Bluegrass Water Utility Operating Company, Inc.
Kingswood WWTF
KYPDES Permit No. KY0101419
Agency Interest No. 455

On behalf of Bluegrass Water Utility Operating Company, LLC, we are submitting this letter to address the current Corrective Action Plan status that was approved January 28, 2020. We are continuing to work to effluent compliance for this facility.

Per the original CAP, Bluegrass Water UOC continues to make improvements stipulated on the submitted construction permit. Due to the effect of COVID-19, our contractors have encountered delays on supplies and materials on common good & services. With uncertainty of material deliveries and unexpected changes to our timeframe for completion, Bluegrass Water Utility Operating Company, LLS determined that the repairs at Kingswood will be completed by October 1, 2022. Following the improvements included in the construction permit the facility should be able to consistently comply with permitted limits.

Please let me know if this letter meets the status report requirements of achieving system compliance.

Sincerely,



Enrique Chavez Jr.
Bluegrass Water Utility Operating Company, LLC
Utility Project Manager



BLUEGRASS WATER

Utility Operating Company

A CSWR Managed Utility

Attn: Wes Dement
Energy and Environment Cabinet
Department for Environmental Protection
Division of Enforcement
300 Sower Blvd 3rd floor
Frankfort, KY 40601

Mr. Wes Dement,

In accordance with the Corrective Action Plan for Kingswood WWTF submitted to the EEC on 12/12/2019 and approved by the Department on 1/28/2020 I hereby submit this status report concerning improvements made to the facility and next steps.



In the original CAP plan documents, it was conveyed that an analysis of the system implied that the wastewater treatment facility appeared to be in generally good condition and adequate to meet the permitted limits, and that exceedances of permitted limits in the past (Ammonia, TSS, and E.Coli) were the result of operational shortcoming under the previous ownership, and failure to properly maintain the clarifier and UV system. We stated that we believed under our operations, the facility would begin to consistently meet limits. Even at the time the CAP was submitted the plant had begun to meet limits it had preciously violated.

The CAP laid out plans to replace the valving on the clarifier returns and skimmers, replace the existing skimmer, replace the UV ballast and sensor, installation of a magnetic flow meter and Mission remote monitoring system, and cleaning and jetting of the collection system. All of these improvements were completed within the schedule as planned with the exception of the replacement of the UV sensor. The currently installed UV system is no longer in production and the sensor is no longer available. The sensor's function is to alert the operator when a UV bulb is no longer producing enough light. As a result, the system was evaluated to establish a predictive maintenance routine of replacing the bulbs on an aggressive schedule to ensure proper disinfection is not interrupted even with the sensor not functioning.

In monitoring the performance of the facility as it pertains to compliance with permitted limits throughout the CAP period, there have been no exceedances of limits since November of last year.

At this time, BWUOC does not believe any additional improvements will be necessary for the Kingswood WWTF to continue to meet permitted limits and comply with EEC regulations. We are however considering replacing the UV system in the near future with a newer system with available parts. Additionally, while they haven't dropped below NPDES limits, the DO levels are dropping at the facility and we are concerned that the existing air header may need to be resized, we are currently evaluating the air header and the sizing of the current blower to determine if replacement is warranted.

Thanks,
JON MEANY
Utility Engineer

 (314) 380-8537 Ext. 215
 (314) 482-0342
 (314) 736-4759
 jmeany@cswrgroup.com
 1650 Des Peres Rd., Suite 303,
Des Peres, MO 63131

1650 Des Peres Rd, Suite 303, St. Louis, MO 63131

www.centralstateswaterresources.com



September 23, 2022

Nicholas Fields
Kentucky Department for Environmental Protection
Division of Enforcement
300 Sower Blvd., 3rd Floor
Frankfort, KY 40601

Bluegrass Water Utility Operating Company, Inc.
Kingswood WWTF
KYPDES Permit No. KY0101419
Agency Interest No. 455

On behalf of Bluegrass Water Utility Operating Company, LLC, we are submitting this letter to address the current Corrective Action Plan status that was approved January 28, 2020. BGUOC submitted an extension request on January 28, 2022, with a projected completion date of October 1, 2022. We are continuing to work to effluent compliance for this facility.

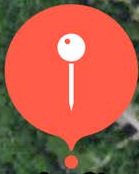
Per the original CAP, Bluegrass Water UOC continues to make improvements stipulated on the submitted construction permit. Due to the effect of COVID-19, our contractors have encountered delays on supplies and materials on common good & services. The UV disinfection system replacements components have been delayed by the manufacturer. BGUOC plans to rehabilitate and/or change unit, due to lack of supply availability. With uncertainty of material deliveries and unexpected changes to our timeframe for completion, Bluegrass Water Utility Operating Company, LLS determined that the repairs at Kingswood will be completed by March 31, 2023. Following the improvements included in the construction permit the facility should be able to consistently comply with permitted limits.

Please let me know if this letter meets the status report requirements of achieving system compliance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Enrique Chavez Jr.", is positioned below the "Sincerely," text.

Enrique Chavez Jr.
Bluegrass Water Utility Operating Company, LLC
Utility Project Manager



Ace Ct

Kings Church Rd

1319

ID	Agency Interest	County	Phys Add Line 1	City
455	Kingswood WWTP	Bullitt	Kings Church Rd	Taylorsville
458	Lake Columbia WWTP	Bullitt	251 Columbia Ln	Shepherdsville
479	Woodland Acres	Bullitt	57 Hemlock Dr	Shepherdsville
1388	Fox Run WWTP	Franklin	US 60 W	Frankfort
1469	Herrington Haven Subd	Garrard	Herrington Haven Rd	Lancaster
1643	Airview WWTP	Hardin	178 W Airview Dr	Elizabethtown
2809	Brocklyn Utilities LLC WWTP	Madison	Hager Dr	Richmond
2935	Golden Acres WWTP	Marshall	Golden Acres Loop	Sharpe
3041	Great Oaks WWTP	McCracken	Creekside Dr	Paducah
3070	Timberland Subdivision WWTP	McCracken	Timberland Dr	Heath
3367	River Bluffs WWTP	Oldham	13121 Creekview Rd	Prospect
3901	Delaplain Disposal	Scott	249 W Yusen Dr	Georgetown (Scott)
3955	Persimmon Ridge Subd & WWTP	Shelby	72 Persimmon Ridge Dr	Louisville
8083	Longview Country Club	Scott	3243 Frankfort Pike	Georgetown (Scott)
44397	Darlington Creek HOA Subd	Campbell	US 27 S & KY 154	Alexandria (Campbell)
163895	LH WWTP	Scott	Frankfort Pike	Georgetown (Scott)

State	Zip	Lat.	Long.	Relationship	ORG ID
KY	40071	38.090101	-85.490572		
				is owned by	41028
KY	40165	38.058470	-85.627580		
				is owned by, is operated by	41028
KY	40165	38.007500	-85.729722		
				is owned by	41700
KY	40601	38.170421	-84.936721		
				has KPDES primary mail contact of	41700
KY	40444	37.661389	-84.689722		
				is owned by	41700
KY	42701	37.758333	-85.892222		
				is owned by	41028
KY	40475	37.731389	-84.342778		
				has KPDES primary mail contact of	41700
KY	42025	36.972944	-88.480861		
				is owned by	41028
KY	42001	36.986158	-88.638298		
				is owned by	41028
KY	42086	37.079144	-88.775352		
				is owned by	41700
KY	40059	38.376944	-85.604722		
				is owned by	41700
KY	40324	38.286111	-84.556111		
				has KPDES primary mail contact of	41700
KY	40245	38.297778	-85.439722		
				is owned by, is operated by	41028
KY	40324	38.211301	-84.659024		
				is owned by	41028
KY	41001	38.853333	-84.386667		
				has KPDES primary mail contact of	44756
KY	40324	38.213388	-84.663159		
				is owned by	41028

ORG Name	Street	City	ST	ZIP
Bluegrass Water Utility Operating Company LLC	500 Northwest Plaza Dr Ste 500	Saint Ann	MO	63074
Bluegrass Water Utility Operating Company LLC	500 Northwest Plaza Dr Ste 500	Saint Ann	MO	63074
Bluegrass Water Utility Operating Company LLC	1650 Des Peres Rd Ste 303	Saint Louis	MO	63131
Bluegrass Water Utility Operating Company LLC	1650 Des Peres Rd Ste 303	Saint Louis	MO	63131
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Bluegrass Water Utility Operating Company LLC	500 Northwest Plaza Dr Ste 500	Saint Ann	MO	63074
Bluegrass Water Utility Operating Company LLC	1650 Des Peres Rd Ste 303	Saint Louis	MO	63131
Bluegrass Water Utility Operating Company LLC	500 Northwest Plaza Dr Ste 500	Saint Ann	MO	63074
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Bluegrass Water Utility Operating Company LLC	1650 Des Peres Rd Ste 303	Saint Louis	MO	63131
Bluegrass Water Utility Operating Company LLC	1650 Des Peres Rd Ste 303	Saint Louis	MO	63131
Bluegrass Water Utility Operating Company LLC	500 Northwest Plaza Dr Ste 500	Saint Ann	MO	63074
Bluegrass Water Utility Operating Company LLC	500 Northwest Plaza Dr Ste 500	Saint Ann	MO	63074
Bluegrass Water Utility Operating Company LLC	1630 Des Peres Rd Ste 140	Des Peres	MO	63131
Bluegrass Water Utility Operating Company LLC	500 Northwest Plaza Dr Ste 500	Saint Ann	MO	63074

PH	Start Date
314-736-4672	10/18/2019
314-736-4672	10/2/2019
314-736-4672	4/1/2021
314-736-4672	4/2/2020
314-736-4672	4/1/2021
314-736-4672	9/24/2019
314-736-4672	4/2/2020
314-736-4672	10/1/2019
314-736-4672	10/1/2019
314-736-4672	5/8/2020
314-736-4672	5/8/2020
314-736-4672	4/7/2021
314-736-4672	9/19/2019
314-736-4672	9/27/2019
314-736-4672	6/1/2022
314-736-4672	9/27/2019

ANDY BESHEAR
GOVERNOR



REBECCA W. GOODMAN
SECRETARY

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

ANTHONY R. HATTON
COMMISSIONER

300 SOWER BOULEVARD
FRANKFORT, KENTUCKY 40601

January 28, 2020

Jake Freeman
Central States Water Resources
500 Northwest Plaza Dr., Suite 500
St. Ann, MO 63074

Re: AI Name: Kingswood WWTP
AI No. 455
Case No. DOW-19-3-0152
Activity No. ERF20190001
Facility ID: KY00101419
Bullitt County

Dear Mr. Freeman:

Thank you for your submission of a Corrective Action Plan ("CAP") dated December 12, 2019, for the facility listed above, which the Cabinet has reviewed and accepted. The Division of Water ("DOW") has the following comment regarding the CAP:

- Should you decide to convert the current ultraviolet disinfection system at this facility to another disinfection system, you will need to submit a request for a minor permit modification to the DOW.

Feel free to contact me at 502-782-8638 or wesley.dement@ky.gov should you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Wesley Dement", positioned above a horizontal line.

Kingswood WWTP
Mandy Sappington
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

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

NOTICE OF VIOLATION

To: Kingswood WWTP
Mandy Sappington
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20230001

County: Bullitt

Enforcement Case ID:

Date(s) Violation(s) Observed: 02/16/2023

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

- 1** Violation Description for Subject Item AIOO0000000455():
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, Section 2(1), which cites to 40 CFR 122.41(a), by failing to comply with the terms and conditions of KPDES Permit No. KY0101419, monitoring point 001-1, for E. Coli. The permitted limit for E. Coli is concentration 30-day geometric avg., less than or equal to 130 MPN/100 mL. The facility reported the following: concentration 30-day geometric avg. 235 MPN/100 mL for October 2022.

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]

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: Marlon A. Bascombe
Marlon Bascombe, Environmental Control Manager
Date: March 17, 2023

Kingswood WWTP
Alica Alexander
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

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

NOTICE OF VIOLATION

To: Kingswood WWTP
Alica Alexander
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20210001

County: Bullitt

Enforcement Case ID:

Date(s) Violation(s) Observed: 02/19/2021

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

1 Violation Description for Subject Item AIOO0000000455():

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. KY0101419, 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 mg/L for November 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]

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: March 22, 2021

Kingswood WWTP
Mandy Sappington
1630 Des Peres Rd Ste 104
Des Peres, MO 63131

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

NOTICE OF VIOLATION

To: Kingswood WWTP
Mandy Sappington
1630 Des Peres Rd Ste 104
Des Peres, MO 63131

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20220001
County: Bullitt
Enforcement Case ID:
Date(s) Violation(s) Observed: 03/21/2022

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

- 1** Violation Description for Subject Item AIOO0000000455():
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, Section 2(1), which cites to 40 CFR 122.41(a), by failing to comply with the terms and conditions of KPDES Permit No. KY0101419, monitoring point 001-1, for E. Coli. The permitted limit for E. Coli is concentration 30-day geometric avg., less than or equal to 130 MPN/100 mL; and concentration 7-day geometric, less than or equal to 240 MPN/100 mL. The facility reported the following: concentration 30-day geometric avg.; and 30-day geometric avg. 2420 MPN/100 mL; and concentration 7-day geometric; and 7-day geometric 2420 MPN/100 mL for December 2021.

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]

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:

Natalie P. Bruner

Natalie P. Bruner, Director

Date: May 11, 2022

Kingswood WWTP
Alica Alexander
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

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

NOTICE OF VIOLATION

To: Kingswood WWTP
Alica Alexander
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20220001

County: Bullitt

Enforcement Case ID:

Date(s) Violation(s) Observed: 03/21/2022

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

1 Violation Description for Subject Item AIOO0000000455():

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, Section 2(1), which cites to 40 CFR 122.41(a), by failing to comply with the terms and conditions of KPDES Permit No. KY0101419, monitoring point 001-1, for E. Coli. The permitted limit for E. Coli is concentration 30-day geometric avg., less than or equal to 130 MPN/100 mL; and concentration 7-day geometric, less than or equal to 240 MPN/100 mL. The facility reported the following: concentration 30-day geometric avg.; and 30-day geometric avg. 2420 MPN/100 mL; and concentration 7-day geometric; and 7-day geometric 2420 MPN/100 mL for December 2021.

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]

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:

Natalie P. Bruner

Natalie P. Bruner, Director

Date: April 21, 2022

Kingswood WWTP
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: Kingswood WWTP
Josiah Cox
500 Northwest Plaza Dr Ste 500

Saint Ann, MO 63074

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20200001

County: Bullitt

Enforcement Case ID:

Date(s) Violation(s) Observed: 02/28/2020

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

- 1** Violation Description for Subject Item AIOO0000000455():
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. KY0101419, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is concentration monthly avg., less than or equal to 30. The facility reported the following: concentration monthly avg. 37 mg/L for November 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]

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: May 11, 2020

Kingswood WWTP
Alica Alexander
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

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

NOTICE OF VIOLATION

To: Kingswood WWTP
Alica Alexander
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20210002

County: Bullitt

Enforcement Case ID:

Date(s) Violation(s) Observed: 05/10/2021

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

1 Violation Description for Subject Item AIOO0000000455():

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. KY0101419, monitoring point 001-1, for E. Coli. The permitted limit for E. Coli is concentration 30-day geometric avg., less than or equal to 130 MPN/100 mL; and concentration 7-day geometric, less than or equal to 240 MPN/100 mL. The facility reported the following: concentration 30-day geometric avg. 245 MPN/100 mL; and concentration 7-day geometric 245 MPN/100 mL for March 2021.

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]

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: July 6, 2021

Kingswood WWTP
Mandy Sappington
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

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

NOTICE OF VIOLATION

To: Kingswood WWTP
Mandy Sappington
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20220003

County: Bullitt

Enforcement Case ID:

Date(s) Violation(s) Observed: 08/11/2022

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

1 Violation Description for Subject Item AIOO0000000455():

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, Section 2(1), which cites to 40 CFR 122.41(a), by failing to comply with the terms and conditions of KPDES Permit No. KY0101419, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is concentration monthly avg., less than or equal to 30 mg/L; and concentration max. weekly avg., less than or equal to 45 mg/L. The facility reported the following: concentration monthly avg. 39 mg/L; and concentration max. weekly avg. 77 mg/L for April 2022.

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]

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: Marlon A. Bascombe
Marlon Bascombe, Environmental Control Manager
Date: September 22, 2022

Kingswood WWTP
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: Kingswood WWTP
Josiah Cox
500 Northwest Plaza Dr Ste 500

Saint Ann, MO 63074

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20190002

County: Bullitt

Enforcement Case ID:

Date(s) Violation(s) Observed: 12/04/2019

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

1 Violation Description for Subject Item AIOO0000000455():

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. KY0101419, monitoring point 001-1, for E. Coli. The permitted limit for E. Coli is concentration 30-day geometric avg., less than or equal to 130 MPN/100 mL. The facility reported the following: concentration 30-day geometric avg. 135 MPN/100 mL for August 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 AIOO0000000455():

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. KY0101419, monitoring point 001-1, for Total Ammonia Nitrogen (as N). The permitted limit for Total Ammonia Nitrogen (as N) is loading monthly avg., less than or equal to .67 lbs/day. The facility reported the following: loading monthly avg. .895 lbs/day for August 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 AIOO0000000455():

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. KY0101419, 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. 4.1 mg/L for September 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 AIOO0000000455():

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. KY0101419, monitoring point 001-1, for E. Coli. The permitted limit for E. Coli is concentration 30-day geometric avg., less than or equal to 130 MPN/100 mL. The facility reported the following: concentration 30-day geometric avg. 148 MPN/100 mL for October 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]

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

Kingswood WWTP
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: Kingswood WWTP
Josiah Cox
500 Northwest Plaza Dr Ste 500

Saint Ann, MO 63074

AI Name: Kingswood WWTP **AI ID:** 455 **Activity ID:** ENV20190001
County: Bullitt
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 AIOO0000000455():

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. KY0101419, monitoring point 001-1, for CBOD. The permitted limit for CBOD is loading monthly avg., less than or equal to 2.67 lbs/day. The facility reported the following: loading monthly avg. 3.279 lbs/day for December 2018.

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 AIOO0000000455():

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. KY0101419, monitoring point 001-1, for Total Ammonia Nitrogen (as N). The permitted limit for Total Ammonia Nitrogen (as N) is loading monthly avg., less than or equal to 1.33 lbs/day; and loading max. weekly avg., less than or equal to 2 lbs/day; and concentration monthly avg., less than or equal to 10 mg/L. The facility reported the following: loading monthly avg. 5.389 lbs/day; and loading max. weekly avg. 5.389 lbs/day; and concentration monthly avg. 10.4 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]