

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.  
Lake Columbia WWTF  
KYPDES Permit No. KY0077674  
Agency Interest No. 458

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 February 17, 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 goods & services. With uncertainty of material deliveries and unexpected changes to our timeframe for completion, Bluegrass Water Utility Operating Company, LLS determined the repairs at Lake Columbia 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 Lake Columbia WWTF (KY0077674) submitted to the EEC on 12/20/2019 and approved by the Department on 2/17/2020 I hereby submit this status report concerning improvements made to the facility and next steps.

In the original CAP documents, it was conveyed that an analysis of the system implied that the wastewater treatment facility appeared to be functionally capable of meeting limits, but had fallen short in the past due to a failure to properly maintain the plant and poor operations by previous ownership. Prior to acquisition the facility had a history of exceedances including CBOD, TRC, E.Coli, Ammonia and TSS. At takeover, the initial tests showed exceedances of TSS and E.Coli.




Our preliminary repairs and operational improvements had caused the plant to begin to meet limits more consistently. Improvements were made at the plant in accordance with the predicted schedule in the CAP. These improvements included rebuilding the influent bar screen, replace mechanism for feeding chlorine and dechlorination tablets into contact chamber, installation magnetic flow meter and mission remote monitoring, and spot-welding repairs and painting the aeration tank. While the improvement was significant, it was determined that the sludge returns also needed to be replaced for the facility to consistently meet limits per the status report submitted 6/30/2020. These returns were replaced by 7/31/2020.

We feel that the facility is now capable of consistently meeting the permitted limits, however, to ensure the facility will function optimally we are considering two additional improvements. First, we are considering the addition of a sludge holding tank to help the facility better cycle sludge. Additionally, we are evaluating switching from chlorine and dechlorination to peroxyacetic acid and post aeration for disinfection at some point in the future to reduce operational costs. Should these improvements be pursued, BWUOC will submit construction permit applications for review by EEC/DEP and KYPSC

Please feel free to reach out for any additional information or with any questions.

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](http://www.centralstateswaterresources.com)



# BLUEGRASS WATER

Utility Operating Company

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Attn: Wes Dement  
Energy and Environment Cabinet  
Department for Environmental Protection  
Division of Enforcement  
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In accordance with the Corrective Action Plan for Lake Columbia WWTF (KY0077674) submitted to the EEC on 12/20/2019 and approved by the Department on 2/17/2020 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 functionally capable of meeting limits, and had fallen short in the past due to a failure to properly maintain the plant and poor operations by previous ownership. Prior to acquisition the facility had a history of exceedances including CBOD, TRC, E.Coli, Ammonia and TSS. At takeover, the initial tests showed exceedances of TSS and E.Coli. We stated that we believed under our operations and with repairs, the facility would begin to consistently meet limits.

Even at the time the CAP was submitted, our preliminary repairs and operational improvements had caused the plant to begin to meet limits more consistently. For example, the pattern of continuous Ammonia violations essentially ended when we took over with only one exceedance in October of 2019 after exceedances for the previous 12 testing periods. Improvements were made at the plant in accordance with the predicted schedule in the CAP. These improvements included rebuilding the influent bar screen, replace mechanism for feeding chlorine and dechlorination tablets into contact chamber, installation magnetic flow meter and mission remote monitoring, and spot-welding repairs to the aeration tank.

Throughout the CAP period, there have been a few exceedances related to work being performed at the plant. The issues seem to be tied to repairing the aeration system at the plant leading to the breakdown of sludge in the plant. This led to pin flock passing through to the contact chamber causing sludge bulking in the contact chamber. This resulted in several issues with TSS and E.Coli. In the most recent month of testing, the facility complied with all permit limits, however, we believe replacing the sludge returns from the clarifier is needed to prevent future issues with sludge in the contact chamber. This replacement should prevent future issues with TSS and E.Coli.

We believe that the replacement of the sludge returns should be complete by 7/31/2020 followed by additional operational observation to ensure that additional improvements are not necessary. We would request to extend the CAP and send an additional update by 8/31/2020 concerning any further necessary repairs at the plant. Please let us know if this course of action is acceptable.

Please feel free to reach out for any additional information or with any questions.

Thanks,

**JON MEANY**  
Utility Engineer

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



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.  
Lake Columbia WWTF  
KYPDES Permit No. KY0077674  
Agency Interest No. 458

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 February 17, 2020. Additionally, a revised CAP was submitted on February 24, 2021, that stated the facility would be compliant by February 18, 2022. BWOUC submitted an extension request on January 28, 2022, with a projected completion date of October 1, 2022.

Construction was recently completed at this facility including all the repairs and upgrades proposed by our third-party engineering firm. The facility effluent will be compliant with the operating permit on September 28, 2022

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

**CASE CLOSURE MEMORANDUM**

**TO:** Natalie Bruner, Director  
Division of Enforcement

**THROUGH:** Justin T. Schul, Branch Manager  
Division of Enforcement

11/2/2022

**X** *Justin T. Schul*

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**FROM:** Signed by: Justin Schul  
Nicholas Fields, Enforcement Specialist  
Division of Enforcement

**DATE:** November 2, 2022

**SUBJECT:** Closure: Lake Columbia WWTP (Bluegrass)  
AI ID: 458  
AI Name: Lake Columbia WWTP  
Activity ID: ERF20190001  
Case No.: DOW 19-3-0153

- The Lake Columbia Subdivision in Bullitt County previously operated the small package plant known as the Lake Columbia WWTP; the plant was failing and need of repair and maintenance. The plant was purchased by Bluegrass Water Utility Operating Company (BWUOC) in September of 2019.
- Before purchasing the plant, BWUOC entered into a **friendly Agreed Order** with the Cabinet on September 3, 2019, in order to rehabilitate the failing facility.
- A Corrective Action Plan (CAP) was received by the Cabinet on December 21, 2019, to address the issues at the plant.
- The CAP was completed on October 1, 2022, the rehabilitation was originally scheduled to be completed in June of 2020, but the COVID-19 Pandemic greatly slowed the progress of the repairs at the facility.
- Upon completion of the CAP, DENF contacted the Louisville Regional DOW Office to perform an inspection to ensure that the facility was now in compliance. This inspection was completed on October 21, 2022, and showed that the facility was complying with their KPDES Permit. Recent DMR reviews also show no recent effluent violations from the facility.
- The Louisville Regional DOW Office agrees with the closure of this case.
- With the above-stated facts in mind, and with your initials above, this case will be closed in the DENF.

## MEMORANDUM

**TO:** Natalie P. Bruner, Director  
Division of Enforcement

**THRU:** Justin Schul, Branch Manager  
Division of Enforcement

9/23/2022

X *Justin T. Schul*

---

Signed by: Justin Schul

**FROM:** Chris Davis, Environmental Enforcement Specialist  
Division of Enforcement

**DATE:** September 22, 2022

**RE:** Case Closure  
AI Name: Woodland Acres Sanitation Inc  
AI ID: 479  
Activity ID: ERF20190001  
County: Bullitt  
Case No. DOW-19-3-0204

Woodland Acres Sanitation Inc. is a domestic wastewater treatment plant located in Bullitt County at Lot 57 Hemlock Drive, Shepherdsville, KY 40109. The facility services a mobile home community consisting of 121 mobile home lots, and holds KPDES Permit No. KY0091600. This facility was referred to enforcement, back in November of 2019 due to 3 consecutive years of non-submittal of Discharge Monitoring Reports (DMRs). This Division of Enforcement (DENF) case dealt with the previous owner, Mr. Joseph B. Murphy, who transferred permit ownership to Bluegrass Water Utility Operating Company in March 2021.

DENF held two administrative conferences with Mr. Murphy and his daughter (who had come down to help her father) in order to help them with their DMRs and negotiate a settlement. During this time, Mr. Murphy's health was failing and the daughter took over the majority of the responsibilities. They both stressed to DENF multiple times that they were not 'very good with computers' and had trouble with obtaining their DMR data and submitting tax documents/financial info to run in the ABLE financial tool. Woodland Acres continued to have delayed responses when asked about their progress, and would continuously state that they would have documents to us, but failed to do so. On December 6, 2020, Woodland Acres contacted DENF stating that they 'were at a loss for what to do'. They claimed hardships from Covid-19, inefficiency with computers, and declining health. DENF explained to Woodland Acres that if we could not resolve the case, it would be referred to our legal department. Woodland Acres was given a final deadline of December 14, 2020 to get information submitted to determine the penalty and start negotiations. No additional information was submitted.

This case was referred to the Office of Legal Services (OLS) on December 28, 2020. While OLS was drafting the complaint, Mr. Murphy sold the facility and transferred the KPDES permit to Bluegrass Water Utility Operating Company in March 2021. This left the Cabinet to seek civil penalty only since they no longer owned the facility. A Mediation Conference was scheduled in October 2021 to discuss settlement of civil penalty between both parties; however Mr. Murphy suffered a serious stroke so it was put in abeyance until either party requested a scheduling order. The Cabinet received word that Mr. Murphy had passed away on December 1, 2021. A statement from his attorney stated that 'Mr. Murphy was the organizer and member of Woodland Acres Utilities, LLC. Respondent Mary S. Murphy, Mr. Murphy's wife, had no involvement in the operation of Woodland Acres Utilities, LLC, and/or the wastewater treatment plant'.

The Cabinet moved to dismiss the action since there were no remedial measures any of the Respondents could perform, and the Cabinet decided not to pursue Mr. Murphy's estate for civil penalties. A Final Secretary's Order for dismissal was signed and filed on August 12, 2022.



SITE LOCATION MAP  
FOR LAKE COLUMBIA SUBDIVISION WWTF  
ZONETON, KY

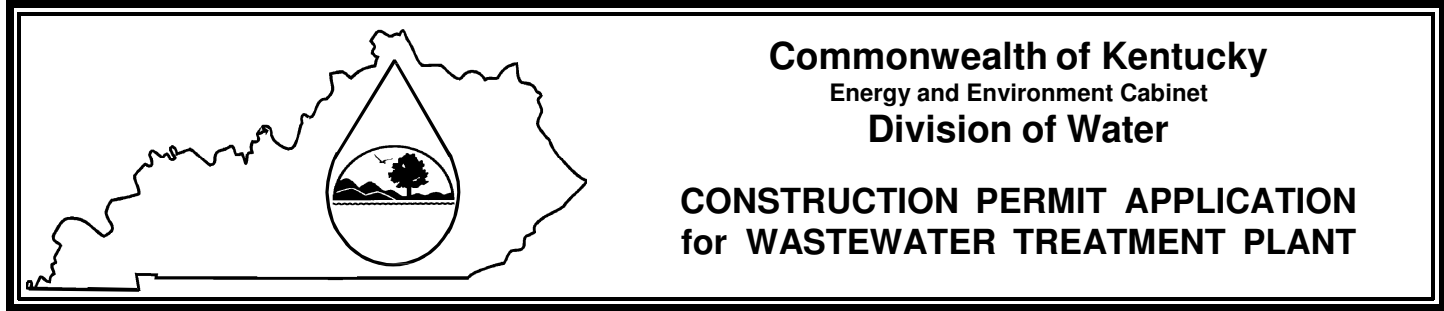


PRELIMINARY

THIS DRAWING IS FOR REVIEW ONLY AND  
SHALL NOT BE USED FOR CONSTRUCTION



**21**  
**DESIGN**  
**GROUP INC.**  
ENGINEERING & SURVEYING  
1351 Jefferson Suite 301 mca@21designgroup.net  
Washington, MO 63070 P: 636-432-9029



See the INSTRUCTIONS for more information about selected portions of this application.  
 Questions on completing this application? Contact the Water Infrastructure Branch at 502/564-3410 or visit our website at <http://water.ky.gov> for more information.

**I. CONSTRUCTION PROJECT INFORMATION**

**Project Name:** Woodland Acres WWTP System Upgrades

**Project City/County:** Shepardsville, Bullitt County, Kentucky

**Name of WWTP:** Woodland Acres Subdivision WWTP

**KPDES Number of WWTP, if known** (for modifications to an existing plant): **KY** 0091600

**Estimated cost of WWTP improvements and sewer line extension:** \$ 331,000

**Project is:**  **WWTP Only**  **WWTP with sewer lines**  
 **Minor Modification to WWTP (Complete only Sections I, II, IV A, B, C, E3, H1, VII, VIII)**

**II. APPLICANT INFORMATION**

**Applicant (Entity paying for construction):** Bluegrass Water Utility Operating Company LLC **E-mail:** jfreeman@cswrgroup.com

**Street Address:** 1650 Des Peres Road, Suite 303

**City, State, Zip:** St. Louis, MO 63131

**Will ownership be transferred?**  **Yes.** **Name of new owner:** \_\_\_\_\_  **No**

**III. PRELIMINARY SUBMITTAL**

Has a Preliminary Submittal been made with all the information in this section? [See 401 KAR 5:005, Section 3]

**Yes.** **Name of project:** \_\_\_\_\_  
**County and Location of project, then skip to next section:** \_\_\_\_\_

**No.** Provide the information below that has not been previously submitted (use additional pages, as necessary). Place a **check** (✓) by the items included in the application or an **N/A** if the item is not applicable to the project.

N/A **A.** A copy of a 7½ minute USGS topographic map, with the WWTP, any proposed sewer lines, service area, and discharge location identified.

N/A **B.** For a WWTP located within a planning area, a letter from the regional or facility planning agency stating the proposed WWTP is compatible with the regional facility plan or the water quality management plan.

N/A **C.** For a WWTP located within a planning area, a demonstration that a connection to the regional facility is not available.

N/A **D.** For a regional WWTP, a water quality management plan that is in compliance with **401 KAR 5:006**.

## IV. DESIGN CONSIDERATIONS

### A. PLANS AND SPECIFICATIONS.

Design plans and specifications shall comply with 401 KAR 5:005 and "Recommended Standards for Wastewater Facilities" ("Ten States' Standards") 2014 edition. If engineering practices, other than those contained in "Ten States' Standards", were used in the design, indicate the source and the corresponding portion of the design. **[See 401 KAR 5:005, Section 7]**

**Plans and specifications submittals shall meet on of the following options:**

- Submit at least one paper printed set of detailed plans (no larger than 24" x 36") and a PDF copy of the plans and specifications on a data storage device such as a USB flash drive. Both copies shall be dated with a stamp, signature of a licensed professional engineer in Kentucky which complies with the requirements of 201 KAR 18:104. The digital plans shall consist of a single pdf file and be in a folder called "Engineering Plans" and the specifications manual shall be in a folder called "Specifications".
- Submit a PDF copy of the plans and specifications digitally via the electronic form on the KY One Stop Business Portal website. The PDF copy shall be dated with stamp and signature of a licensed engineer in Kentucky which complies with the requirements of 201 KAR 18:104 Section 3. The plans shall be submitted as a single pdf file.

**B. DESIGN ENGINEER,** if the WWTP design capacity is greater than 10,000 gpd or if the sewer lines associated with the WWTP will become part of a sewer system served by a regional facility. **[Section 6]**

P.E.'s Name: Benjamin Kuenzel Firm: 21 Design Group  
Street Address: 1351 Jefferson Street Suite 301  
City, State, Zip: Washington, MO 63090  
Phone: 636-432-5029 Fax: N/A E-mail: ben@21designgroup.net

**C. CONFORMITY TO PLANS AND SPECIFICATIONS.** Provide name of person who will inspect and certify that the constructed facility conforms to the approved plans and specifications. If the WWTP's design capacity is greater than 10,000 gpd, or if the sewer lines will become part of a sewer system served by a regional facility, this person must be a professional engineer (P.E.). **[Section 3]**

Name: Benjamin Kuenzel Firm: 21 Design Group  
Street Address: 1351 Jefferson Street Suite 301  
City, State, Zip: Washington, MO 63090  
Phone: 636-432-5029 Fax: N/A E-mail: ben@21designgroup.net

**D. DESIGN CAPACITIES.** Provide the following design capacities, in million gallons per day or pounds per day. **[Section 3]**

Average Daily Flow: \_\_\_\_\_ MGD Influent BOD: \_\_\_\_\_ lb/day  
Peak Daily Flow: \_\_\_\_\_ MGD Influent SS: \_\_\_\_\_ lb/day  
Peak Hourly Flow: \_\_\_\_\_ MGD Influent NH<sub>3</sub>-N: \_\_\_\_\_ lb/day

**E. Design Criteria.** Provide the following information (use additional pages, as necessary). Place a **check (✓)** by the items included in the application or an **N/A** if the item is not applicable to the project.

- N/A 1. A schematic drawing of the facility layout and explanation of the proposed facility and method of operation. **[Section 3]**
- N/A 2. WWTP's Reliability Category, Grade A, B, or C: \_\_\_\_\_. Include a detailed description of the reliability measures that will be used for the WWTP. **[Sections 3 and 13]**
3. A discussion of the design criteria used to size the unit processes. **[Section 3]**

**F. LABORATORY SERVICES.** Give name of laboratory that will provide services for self-monitoring and process control. **[Section 3]**

Firm Name: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_

- G. SITE LOCATION.** Place a **check (✓)** by the items that are included in this application or an **N/A** if the item is not applicable to the project.
- N/A 1. Include a plat or survey clearly indicating the site's boundaries, position of proposed facility in reference to the boundaries, and position of dwellings within 200 feet of the WWTP. **[Section 3]**
- N/A 2. If an open-top WWTP is closer than 200 feet to the closest dwelling, include what structure or other measures will be used for noise and odor control. **[Section 4]**
- N/A 3. For a WWTP with a spray irrigation system, if the distance from the spray field to the property boundary is less than 20 feet, include what protective measures will be used to inhibit spray from crossing property boundary. **[Section 21]**

- H. OTHER INFORMATION TO BE SUBMITTED WITH APPLICATION.** Place a **check (✓)** by the items that are included in this application or an **N/A** if the item is not applicable to the project.
1. If modifying or replacing an existing WWTP or sewer line, a closure plan indicating how the new facility will be constructed without a by-pass to a stream and the procedures that will be used for abandoning the existing facility. **[Section 3]**
- N/A 2. A Sludge Management Plan for WWTPs, including the sludge processing method and how sludge will be ultimately disposed. **[Section 3]**
- N/A 3. If the discharge point does not coincide with a blue line on a USGS map, a copy of a recorded deed, recorded other right of ownership, or recorded right of easement for a corridor to the nearest blue line stream. **[Section 3]**
- N/A 4. A description of and detailed specifications for the flow measuring device. **[Section 7]**
- N/A 5. If the WWTP discharges to a sinkhole or sinking stream, a plan for a groundwater tracer study (or a previously conducted groundwater tracer study). **[Section 4]**

**V. SEWER LINES**

**Include the following items for projects that include sewer lines. If project is for only a WWTP, skip to next section.** Place a **check (✓)** by the items that are included in this application or **N/A** if the item is not applicable to the project.

- N/A A. If the project includes a pump station, the pump performance curve. **[Section 8]**
- N/A B. If the project includes gravity sewer lines or force mains, a plan view and profile view for each. **[Section 6]**
- N/A C. A demonstration that the sewer system has adequate capacity to treat the current and the anticipated flow to the WWTP and that the sewer system is not subject to excessive infiltration or excessive inflow. **[Section 8]**
- N/A D. A demonstration that the WWTP has adequate capacity to transport the anticipated flow to the WWTP and the WWTP is not subject to excessive infiltration or excessive inflow. **[Section 8]**

**VI. OTHER REQUIRED APPLICATIONS**

- \_\_\_ A. If the WWTP has a discharge, complete and file with this application: KPDES Application (KPDES Form 1); and Form A, B, C, or Short Form C, as applicable.
- \_\_\_ B. If the WWTP does not have a discharge, complete and file with this application the "No Discharge Operating Permit Application, Form ND."


**VII. FEES**

**Fees.** Check or money order must be made payable to "**Kentucky State Treasurer**" for the total amount. **Fees do not apply** for a municipality, sanitation district, or other publicly owned facility. **[Section 5]**

WWTP Category:	<u>Minor Modification to a WWTP</u>	Amount:	\$ <u>200</u>
Sewer Line Category:	<u>N/A</u>	Amount:	\$ <u>0</u>
		<b>Total Amount:</b>	\$ <u>200</u>

**VIII. CERTIFICATION**

I, the applicant, certify under penalty of law that this document and all attachments were prepared under my direction or supervision. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment or both for known violations. **[Section 2]**

<b>Applicant's Name and Official Title (Type or Print)</b> Jacob Freeman	<b>Phone Number (Include area code)</b> (314)-550-1167
<b>Signature</b> 	<b>Date</b> 2/11/22



## IV. DESIGN CONSIDERATIONS

### A. PLANS AND SPECIFICATIONS.

Design plans and specifications shall comply with 401 KAR 5:005 and "Recommended Standards for Wastewater Facilities" ("Ten States' Standards") 2014 edition. If engineering practices, other than those contained in "Ten States' Standards", were used in the design, indicate the source and the corresponding portion of the design. **[See 401 KAR 5:005, Section 7]**

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Submit at least one paper printed set of detailed plans (no larger than 24" x 36") and a PDF copy of the plans and specifications on a data storage device such as a USB flash drive. Both copies shall be dated with a stamp, signature of a licensed professional engineer in Kentucky which complies with the requirements of 201 KAR 18:104. The digital plans shall consist of a single pdf file and be in a folder called "Engineering Plans" and the specifications manual shall be in a folder called "Specifications".

Submit a PDF copy of the plans and specifications digitally via the electronic form on the KY One Stop Business Portal website. The PDF copy shall be dated with stamp and signature of a licensed engineer in Kentucky which complies with the requirements of 201 KAR 18:104 Section 3. The plans shall be submitted as a single pdf file.

**B. DESIGN ENGINEER,** if the WWTP design capacity is greater than 10,000 gpd or if the sewer lines associated with the WWTP will become part of a sewer system served by a regional facility. **[Section 6]**

P.E.'s Name: \_\_\_\_\_ Firm: \_\_\_\_\_

Street Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

**C. CONFORMITY TO PLANS AND SPECIFICATIONS.** Provide name of person who will inspect and certify that the constructed facility conforms to the approved plans and specifications. If the WWTP's design capacity is greater than 10,000 gpd, or if the sewer lines will become part of a sewer system served by a regional facility, this person must be a professional engineer (P.E.). **[Section 3]**

Name: \_\_\_\_\_ Firm: \_\_\_\_\_

Street Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_ E-mail: \_\_\_\_\_

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\_\_\_\_ 2. WWTP's Reliability Category, Grade A, B, or C: \_\_\_\_\_. Include a detailed description of the reliability measures that will be used for the WWTP. **[Sections 3 and 13]**

3. A discussion of the design criteria used to size the unit processes. **[Section 3]**

**F. LABORATORY SERVICES.** Give name of laboratory that will provide services for self-monitoring and process control. **[Section 3]**

Firm Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

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**H. OTHER INFORMATION TO BE SUBMITTED WITH APPLICATION.** Place a **check (✓)** by the items that are included in this application or an **N/A** if the item is not applicable to the project.

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- \_\_\_ 2. A Sludge Management Plan for WWTPs, including the sludge processing method and how sludge will be ultimately disposed. **[Section 3]**
- \_\_\_ 3. If the discharge point does not coincide with a blue line on a USGS map, a copy of a recorded deed, recorded other right of ownership, or recorded right of easement for a corridor to the nearest blue line stream. **[Section 3]**
- \_\_\_ 4. A description of and detailed specifications for the flow measuring device. **[Section 7]**
- \_\_\_ 5. If the WWTP discharges to a sinkhole or sinking stream, a plan for a groundwater tracer study (or a previously conducted groundwater tracer study). **[Section 4]**

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- \_\_\_ A. If the project includes a pump station, the pump performance curve. **[Section 8]**
- \_\_\_ B. If the project includes gravity sewer lines or force mains, a plan view and profile view for each. **[Section 6]**
- \_\_\_ C. A demonstration that the sewer system has adequate capacity to treat the current and the anticipated flow to the WWTP and that the sewer system is not subject to excessive infiltration or excessive inflow. **[Section 8]**
- \_\_\_ D. A demonstration that the WWTP has adequate capacity to transport the anticipated flow to the WWTP and the WWTP is not subject to excessive infiltration or excessive inflow. **[Section 8]**

## VI. OTHER REQUIRED APPLICATIONS

- \_\_\_ A. If the WWTP has a discharge, complete and file with this application: KPDES Application (KPDES Form 1); and Form A, B, C, or Short Form C, as applicable.
- \_\_\_ B. If the WWTP does not have a discharge, complete and file with this application the "No Discharge Operating Permit Application, Form ND."

## VII. FEES


**Fees.** Check or money order must be made payable to "**Kentucky State Treasurer**" for the total amount. **Fees do not apply** for a municipality, sanitation district, or other publicly owned facility. **[Section 5]**

WWTP Category:	_____	Amount:	\$ _____
Sewer Line Category:	_____	Amount:	\$ _____
		<b>Total Amount:</b>	\$ _____



**VIII. CERTIFICATION**

I, the applicant, certify under penalty of law that this document and all attachments were prepared under my direction or supervision. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment or both for known violations. **[Section 2]**

<b>Applicant's Name and Official Title (Type or Print)</b> Jacob Freeman		<b>Phone Number (Include area code)</b> (314)-550-1167
<b>Signature</b>		<b>Date</b> 10/28/2020

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

February 17, 2020

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

Re: AI Name: Lake Columbia WWTP  
AI No. 458  
Case No. DOW-19-3-0153  
Activity No. ERF20190001  
Facility ID: KY0077674  
Bullitt County

Dear Mr. Freeman:

Thank you for your submission of a Corrective Action Plan ("CAP") dated December 20, 2019, for the facility listed above, which the Cabinet has reviewed and accepted. The Division of Water has no comments regarding this CAP. Feel free to contact me at 502-782-8638 or [wesley.dement@ky.gov](mailto: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.

May 20, 2022

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

RE: Bluegrass Water Utility Operating Company, LLC  
Woodland Acres WWTP  
KYPDES Permit No. KY0091600  
Agency No. 479

On behalf of Bluegrass Water Utility Operating Company, Inc., we are submitting this letter per the EEC's requirement consistent with the current CAO plan that was approved on October 6, 2021. We are continuing to work to meet effluent compliance for this facility.

BWUOC is currently waiting for CPCN approval for construction and KDOW has not approve our construction permit for this facility. KDOW requested additional information, with regards to the construction plan submitted by 21 Design Group. The assigned engineering firm responded to all questions presented by KDOW and feedback for scope of work continues to be on-hold.

Construction equipment has been ordered. Construction materials have started to arrive, and improvements will begin as soon as construction permit approval is confirmed by Div. of Water. However, some of the main equipment materials have been delayed on delivery due to shortages and/or limited production. Some of the construction can be started but we are working closely with the manufacturers to ensure all goods and materials are available once approval is confirmed.

Please let us know if this letter does not meet the status report requirements of achieving system compliance.

Sincerely,



**Enrique Chavez Jr.**  
Utility Project Manager  
Email: [echavez@cswrgroup.com](mailto:echavez@cswrgroup.com)  
Office: (314) 380-8043  
Mobile: (314) 437-5714





**Andy Beshear**  
GOVERNOR

**ENERGY AND ENVIRONMENT CABINET**  
**DEPARTMENT FOR ENVIRONMENTAL PROTECTION**

300 Sower Boulevard  
Frankfort, Kentucky 40601  
Phone: (502) 564-2150  
Fax: 502-564-4245

**Rebecca Goodman**  
SECRETARY

**Anthony R. Hatton**  
COMMISSIONER

November 2, 2022

Bluegrass Water utility Operating Company, LLC  
500 NW Plaza Drive, Suite 500  
Saint Ann, MO 63704

Re: AI Name: Lake Columbia WWTP  
AI No. 458  
Case No. DOW-19-3-0153  
Activity No. ERF20190001  
Bullitt County

Dear Mr. Chavez:

The Division of Enforcement has determined that Bluegrass Water utility Operating Company, LLC has complied with the terms and conditions of the Agreed Order, executed on September 3, 2019. The Division considers Case No. DOW 19-3-0153 resolved and closed. Please contact me at 502-782-5273 or [nicholas.fields@ky.gov](mailto:nicholas.fields@ky.gov) if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nicholas Fields", positioned above a solid horizontal line.

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

April 15, 2021

Bluegrass Water Utility Operating Co LLC  
Delaplain Disposal  
57 Hemlock Dr  
Shepherdsville, KY 40165

RE: **Change of Ownership**  
Agency Interest # 479  
KPDES Permit #: KY0091600  
Location: Bullitt County, Kentucky

Dear [Mr. Cox](#):

The Division of Water received your request for modification of the Kentucky Pollutant Discharge Elimination System (KPDES) coverage for the above-referenced facility. The KPDES permit has been modified to reflect the change of ownership.

If you have any questions, please contact me at [502-782-1363](tel:502-782-1363), or via e-mail at [joy.haden@ky.gov](mailto:joy.haden@ky.gov).

Sincerely,

A handwritten signature in black ink that reads "Joy Haden".

Joy Haden  
Surface Water Permits Branch  
Division of Water

Enclosure

**KPDES**



**KENTUCKY POLLUTANT  
DISCHARGE ELIMINATION  
SYSTEM**

**PERMIT TRANSFER**

**TRANSFER OF  
AUTHORIZATION TO DISCHARGE UNDER THE  
KENTUCKY POLLUTANT DISCHARGE ELIMINATION SYSTEM**

**PERMIT NO.:** [KY0091600](#)

**AGENCY INTEREST NO.:** [479](#)

**Pursuant to Authority in KRS 224, this permit for:**

New Facility Name: [Delaplain Disposal](#)  
Facility Address: [57 Hemlock Dr](#)  
[Shepherdsville, Bullitt County, Kentucky](#)

Prior Owner: [Woodland Acres Utilities](#)  
Address: [57 Hemlock Dr](#)  
[Shepherdsville, KY 40165](#)

**is hereby transferred to:**

New Owner: [Bluegrass Water Utilities Operating Co LLC](#)  
Mailing Address: [1650 Des Peres Rd Ste 303](#)  
[St Louis, MO 63131](#)

**in accordance with effluent limitations, monitoring requirements and other conditions set forth in this permit.**

The effective date of this permit transfer is April 15, 2021.

[April 15, 2021](#)

**Date Signed**

A handwritten signature in blue ink, appearing to read "Paul Miller".

**Paul Miller, Director  
Division of Water**

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

July 20, 2021

Bluegrass Water Utility Operating Company  
Woodland Acres  
57 Hemlock Dr  
Shepherdsville, KY 40165

RE: **Change of Ownership**  
Agency Interest # 479  
KPDES Permit #: KY0091600  
Location: Bullitt County, Kentucky

Dear [Mr. Favor](#):

The Division of Water received your request for modification of the Kentucky Pollutant Discharge Elimination System (KPDES) coverage for the above-referenced facility. The KPDES permit has been modified to reflect the change of ownership.

If you have any questions, please contact me at [502-782-1363](tel:502-782-1363), or via e-mail at [joy.haden@ky.gov](mailto:joy.haden@ky.gov).

Sincerely,

A handwritten signature in black ink that reads "Joy Haden".

**Joy Haden**  
Surface Water Permits Branch  
Division of Water

Enclosure

**KPDES**



**KENTUCKY POLLUTANT  
DISCHARGE ELIMINATION  
SYSTEM**

**PERMIT TRANSFER**

**TRANSFER OF  
AUTHORIZATION TO DISCHARGE UNDER THE  
KENTUCKY POLLUTANT DISCHARGE ELIMINATION SYSTEM**

**PERMIT NO.:** [KY0091600](#)

**AGENCY INTEREST NO.:** [479](#)

**Pursuant to Authority in KRS 224, this permit for:**

New Facility Name: [Woodland Acres](#)  
Facility Address: [57 Hemlock Dr](#)  
[Shepherdsville, Bullitt County, Kentucky](#)

Prior Owner: [Bluegrass Water Utility Operating Company](#)  
Address: [57 Hemlock Dr](#)  
[Shepherdsville, KY 40165](#)

**is hereby transferred to:**

New Owner: [Bluegrass Water Utility Operating Company](#)  
Mailing Address: [1650 Des Peres Rd, Ste 303](#)  
[St Louis, MO 63131](#)

**in accordance with effluent limitations, monitoring requirements and other conditions set forth in this permit.**

The effective date of this permit transfer is July 20, 2021.

[July 20, 2021](#)

**Date Signed**

A handwritten signature in blue ink, appearing to read "Jean M. Johnson".

**Carey Johnson, Director**  
**Division of Water**





ANDY BESHEAR  
GOVERNOR

REBECCA W. GOODMAN  
SECRETARY

**ENERGY AND ENVIRONMENT CABINET**  
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 SOWER BOULEVARD  
FRANKFORT, KENTUCKY 40601

ANTHONY R. HATTON  
COMMISSIONER

February 13, 2020

Lake Columbia WWTP  
251 Columbia Ln  
Shepherdsville, KY 40165

Re: KPDES Application Complete  
KPDES No.: [KY0077674](#)  
AI ID: 458  
[Bullitt](#) County, Kentucky

Dear [Mr. Cox](#):

Your Kentucky Pollutant Discharge Elimination System (KPDES) permit application for the above-referenced facility was received by the Division of Water on [February 13, 2020](#). A completeness review of your permit application has been conducted and your application has been determined to be administratively complete. This means that your application will now be assigned to a technical reviewer. Please be aware that you may be asked to provide additional information to clarify, modify, or supplement your application material. In accordance with 401 KAR 5:075, Section 1(7) you are being provided written notification that your application has been deemed complete as of the date of this letter.

If you have any questions concerning this matter, please contact [502-782-1363](#) or by email at [Joy.Haden@ky.gov](mailto:Joy.Haden@ky.gov).

Sincerely,

A handwritten signature in black ink that reads "Joy Haden".

[Joy Haden](#)  
Surface Water Permits Branch  
Division of Water

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## Lake Columbia Wastewater Facility Improvements - KY0077674

### Design Considerations – Construction Permit Application

Date: October 28, 2020

#### Introduction

The purpose of this document is to specifically address the criteria used for the design of various improvements to the Great Oaks Wastewater Treatment Facility, and to describe pertinent information required in Section IV - "Design Considerations" of the Construction Permit Application for said improvements.

#### Design Criteria

The process flow diagram for the proposed improvements is included in Section A of the appendix to this specific document.

Raw sewage will continue to enter the facility at the influent screen which is directly upstream from the existing extended aeration tank. The existing extended aeration system, clarifiers, disinfection system and dechlorination system will remain unchanged.

For sludge handling, a single new 3,760 gallon aerobic digester tank will be added to allow operators to have suitable location for stabilization of waste activated sludge, thickening, and storage of digested sludge. The new aerobic digestion system will provide 5.4 cubic feet of volume per population equivalent and 32.5 days of SRT. Waste activated sludge from the existing clarifiers will be conveyed to the new aerobic digester using an air lift. Sludge will be hauled from the new digester tank with vac-trucks that pull sludge from the bottom of the new aerobic digester.

The new aerobic digestion system will be aerated at a rate in excess of 30 scfm/1,000 cf using two new blowers sized to provide a total of 19 scfm at 5.4 psig. The air from the new blower will be introduced through a new coarse bubble diffused aeration system mounted in the new aerobic digester.

A summary of the design criteria used for unit process sizing is included in Section B of the Appendix including Aerobic Digestion Calculations. The process was designed in accordance with the 2014 version of Ten State Standards for Wastewater Facilities and 401 KAR 5:005.

#### Site Location

A site plan can be found in the plan document which shows the site boundaries and the position of the site in reference to those boundaries.

The facility is designed as an open-air plant, so multiple techniques will be used to minimize the negative impact of the plant improvements towards the local population including odor and noise. The blower proposed was selected in part because it is a regenerative style blowers that is quiet in operation. The

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aerobic digester will continuously be aerated to maintain aerobic conditions, significantly reducing the potential for odor generation.

#### Other Information

A constructability challenge will be observed when making improvements to RAS/WAS piping and valving, but the Contractor will be required to perform this work in no more than a 4-6 hour time frame to prevent a reduction in plant operating performance during construction.

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## Appendix

Section A - Process Flow Diagram

Section B - Summary of Design Criteria

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Potable Water  
Wastewater Treatment



Civil Site Design  
Construction Support  
Transportation  
Wastewater Collection

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## Section A – Process Flow Diagram

**DESIGN CRITERIA:**

RAW INFLUENT FLOW

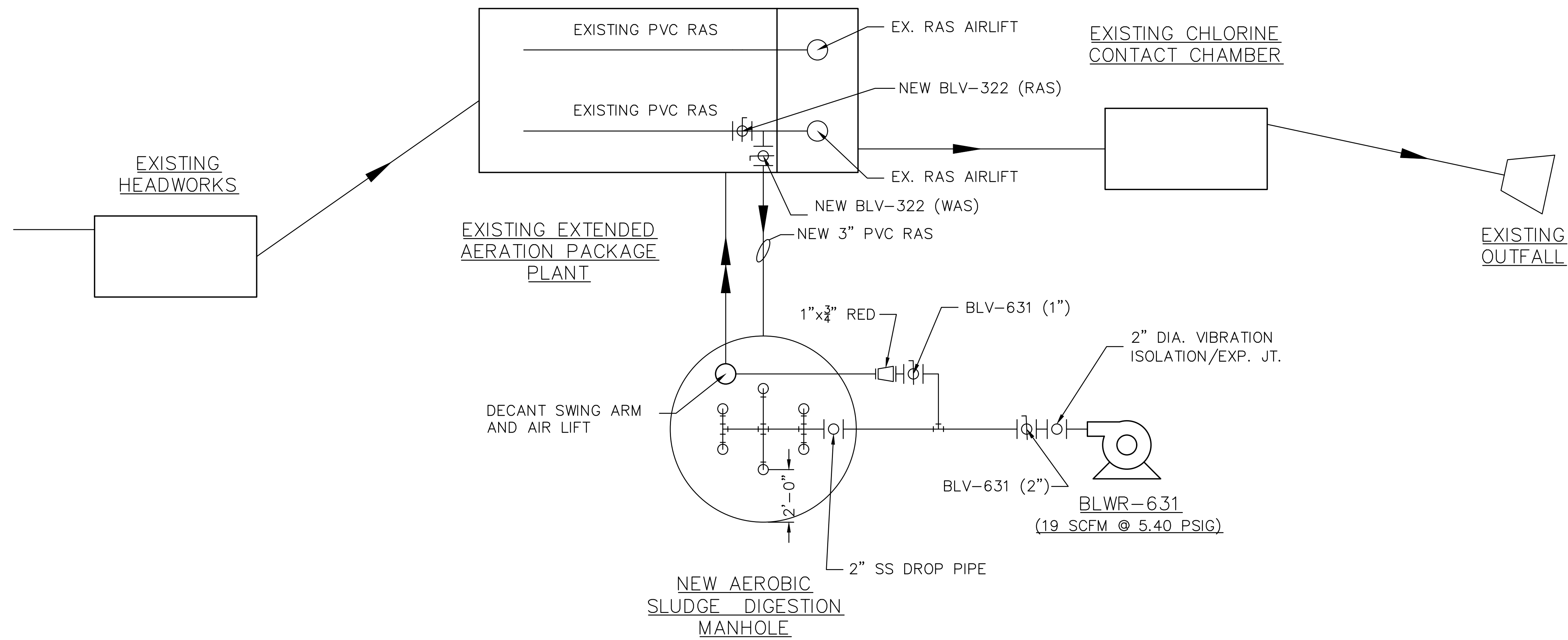
ADF Q = 12,000 GPD  
 PDF Q = 25,000 GPD  
 PHF Q = 30,000 GPD

AEROBIC DIGESTER

DIMENSIONS: 8'x8'x10' (HWL)  
 TOTAL VOLUME: 3,760 GAL.  
 VOL/ POP. EQ.: 5.4 CF/PE  
 EST. SRT.: 32.5 DAYS  
 DIGESTED SLUDGE PRODUCTION: 116 GPD  
 DIGESTED SLUDGE CONCENTRATION: 15,000 MG/L

AEROBIC DIGESTER BLOWER & DIFFUSERS

MIXING RQMT: 30 SCFM/IKCF  
 SCFM RQD: 19 SCFM (15 SCFM TO MIX DIGESTER; 4 SCFM FOR AIRLIFT)  
 DISCHARGE PRESSURE: 5.40 PSIG  
 NO. OF 3/4" FLEXCAPS RQD: 6  
 NO. OF BLOWERS: 1 OPERATING (STAND BY SHARED)  
 TYP. OF BLOWER: REGENERATIVE  
 ELECTRICAL SERVICE: 240V,1Ø



PROCESS FLOW DIAGRAM

**21 DESIGN GROUP INC.**  
 1351 Jefferson, Suite 301  
 Washington, MO 63090  
 mail@21designgroup.net  
 P: 636-452-5229

**PROCESS FLOW DIAGRAM**  
 WILDWOOD SOUTH WWTF  
 ZONETON ROAD AND CEDAR CREEK  
 ZONETON, KY

ENGINEERING CERTIFICATE OF AUTHORITY NO. E-2013005879  
 ENGINEERING LICENSE: BENJAMIN J. KUENZEL, 43678



SEAL DATE: \_\_\_/\_\_\_/2020  
 DRAWN BY: BJK  
 PROJ NUMBER: 542-9  
 DATE: 10/27/2020  
 DRAWING NO: P2

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Wastewater Collection

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## Section B – Summary of Design Criteria

**Facility Name: Lake Columbia, KY**  
**Design Calculations for Permit Application**

Current Average Daily Flow	0.009 mgd
Design Average Daily Flow	0.012 mgd
Current No. of Customers Served (if Known)	31 customers
Design No. of Customers Served	31 customers
No. of Population Equivalents per Customer	3.0 P.E./customer
No. of Population Equivalents	93 P.E.
BOD Concentration	225 mg/L
BOD Loading	22.5 lbs BOD/day
TSS Concentration	225 mg/L
WAS Sludge Yield	0.9 lbs WAS/lb. BODr

**Aerobic Digestion Calculations**

Minimum Unit Volume with 1-Digester	3.00 cu ft/P.E.
Minimum Current Volume Required	2,087 gallons
Minimum Volume at Design Condition	2,087 gallons
Current Design Condition	2,087 gallons
No. of Digesters	1.00
Diameter of Digester	8.00 ft
Depth of Digester	10.00 ft
Volume of Digester	3,760 gallons
Biosolids to Aerobic Digestion	20.3 lbs/day
Design MLSS Concentration in AS	3,500 mg/L
TSS into Aerobic Digestion in WAS	8,750 mg/L
Gallons per Day into Aerobic Digestion	278 gpd
VSS / TSS into Digestion	0.75
VSS Destruction in Aerobic Digestion	38%
VSS Destruction in Aerobic Digestion	6 lbs/day
Oxygen Required / lb. VSS Destroyed	2.0 lbs/lb
AOR Required for Aerobic Digestion	11.6 lbs/day
TSS in Digested Sludge	14.5 lbs/day
TSS in Digested Sludge	15,000 mg/L
VSS in Digested Sludge	9.4 lbs/day
Gallons per Day of Digested Sludge	116 gpd
Solids Retention Time in Aerobic Digester	32.5 days
VSS / TSS of Digested Sludge	0.65
Aeration Rate Design for Mixing Conditions	30 scfm/1,000 cf
Volume to be Mixed	3,760 gallons
Air Supply Required for Mixing / Aeration	15.1 scfm
Air Supply Required for Decant Airlift	3.9 scfm
Discharge Pressure	5.37 psi
No. of Blowers	1
SCFM / Blower	19.0 scfm





**Andy Beshear**  
GOVERNOR

**ENERGY AND ENVIRONMENT CABINET**  
**DEPARTMENT FOR ENVIRONMENTAL PROTECTION**

300 Sower Boulevard  
Frankfort, Kentucky 40601  
Phone: (502) 564-2150  
Fax: 502-564-4245

**Rebecca Goodman**  
SECRETARY

**Anthony R. Hatton**  
COMMISSIONER

September 9, 2022

Mr. Josiah Cox  
Central States Water Resources  
dba Bluegrass Water Utility Operating Company, LLC  
1650 Des Peres Rd., Ste. 303  
Saint Louis, MO 63131

Re: Woodland Acres  
Bullitt County, Kentucky  
Woodland Acres  
Activity ID #: 479, APE20220001  
Receiving Treatment Plant KPDES #: KY0091600

Dear Mr. Cox:

We have reviewed the plans and specifications for the above referenced project. The plans include the construction of:

- a 4,100 gallon wet weather tank with connection piping and appurtenances between the equalization basin and the aeration basin
- three influent grinder pumps in the existing equalization basin
- IFAS cage in the aeration basin
- two new blowers with connection piping and appurtenances for the aeration basin and the IFAS cage

This is to advise that plans and specifications for the above referenced project are APPROVED with respect to sanitary features of design, as of this date with the requirements contained in the attached construction permit.

If we can be of any further assistance or should you wish to discuss this correspondence,

Woodland Acres  
Bullitt County, Kentucky  
Woodland Acres  
Activity ID #: 479, APE20220001  
Receiving Treatment Plant KPDES #: KY00916  
September 9, 2022  
Page 2 of 2

please do not hesitate to contact Mark Rasche at 502-782-6162.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Mark Rasche".

Lake Columbia 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:** Lake Columbia WWTP  
Josiah Cox  
500 Northwest Plaza Dr Ste 500  
  
Saint Ann, MO 63074

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **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 AIOO0000000458():  
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. KY0077674, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is loading monthly avg., less than or equal to 3 lbs/day; and loading max. weekly avg., less than or equal to 4.5 lbs/day. The facility reported the following: loading monthly avg. 9.215 lbs/day; and loading max. weekly avg. 9.215 lbs/day for January 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]

- 2 Violation Description for Subject Item AIOO0000000458():  
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. KY0077674, monitoring point 001-1, for CBOD. The permitted limit for CBOD is loading monthly avg., less than or equal to 3 lbs/day; and loading max. weekly avg., less than or equal to 4.5 lbs/day. The facility reported the following: loading monthly avg. 5.335 lbs/day; and loading max. weekly avg. 5.335 lbs/day for January 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: May 13, 2020

Woodland Acres  
Michael Dick  
1650 Des Peres Rd Ste 303

Des Peres , MO 63131





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

**NOTICE OF VIOLATION**

**To:** Woodland Acres  
Michael Dick  
1650 Des Peres Rd Ste 303

Des Peres , MO 63131

**AI Name:** Woodland Acres    **AI ID:** 479    **Activity ID:** ENV20210002

**County:** Bullitt

**Enforcement Case ID:**

**Date(s) Violation(s) Observed:** 09/01/2021

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

**1** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for Total Ammonia Nitrogen (as N). The permitted limit for Total Ammonia Nitrogen (as N) is loading monthly avg., less than or equal to .83 lbs/day; and loading max. weekly avg., less than or equal to 1.25 lbs/day; and concentration monthly avg., less than or equal to 4 mg/L; and concentration daily max., less than or equal to 6 mg/L. The facility reported the following: loading monthly avg. 3.999 lbs/day; and loading max. weekly avg. 3.999 lbs/day; and concentration monthly avg. 11.1 mg/L; and concentration daily max. 11.1 mg/L for June 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: September 13, 2021

Woodland Acres  
Michael Dick  
1650 Des Peres Rd Ste 303

Des Peres , MO 63131



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

**NOTICE OF VIOLATION**

**To:** Woodland Acres  
Michael Dick  
1650 Des Peres Rd Ste 303

Des Peres , MO 63131

**AI Name:** Woodland Acres    **AI ID:** 479    **Activity ID:** ENV20210003

**County:** Bullitt

**Enforcement Case ID:**

**Date(s) Violation(s) Observed:** 12/02/2021

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

**1** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, 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. 91 mg/L; and concentration max. weekly avg. 91 mg/L for September 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, Environmental Control Manager

Date: December 9, 2021

Woodland Acres  
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: Woodland Acres  
Mandy Sappington  
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

**AI Name:** Woodland Acres    **AI ID:** 479    **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 AIOO0000000479():

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. KY0091600, monitoring point 001-2, 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. 4.55 mg/L for December 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]

**2** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, 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. 59 mg/L; and concentration max. weekly avg. 59 mg/L for December 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]

**3** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration daily max., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. 2.2 mg/L; and concentration daily max. 2.2 mg/L for December 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.

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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: February 28, 2023

Lake Columbia 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:** Lake Columbia WWTP  
Alica Alexander  
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20210003

**County:** Bullitt

**Enforcement Case ID:**

**Date(s) Violation(s) Observed:** 12/02/2021

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

- 1** Violation Description for Subject Item AIOO0000000458():  
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. KY0077674, 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. 6.9 mg/L for August 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.

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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, Environmental Control Manager

Date: January 10, 2022

Woodland Acres  
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:** Woodland Acres  
Mandy Sappington  
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

**AI Name:** Woodland Acres    **AI ID:** 479    **Activity ID:** ENV20220003

**County:** Bullitt

**Enforcement Case ID:**

**Date(s) Violation(s) Observed:** 11/17/2022

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

- 1** Violation Description for Subject Item AIOO0000000479():  
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. KY0091600, monitoring point 001-2, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration daily max., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. 2.2 mg/L; and concentration daily max. 2.2 mg/L for September 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.

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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: January 12, 2023

Woodland Acres  
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: Woodland Acres  
Mandy Sappington  
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

**AI Name:** Woodland Acres    **AI ID:** 479    **Activity ID:** ENV20220002

**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 AIOO0000000479():

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. KY0091600, monitoring point 001-2, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration daily max., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. 1.09 mg/L; and concentration daily max. 1.09 mg/L for June 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]

**2** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, 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; and concentration daily max., less than or equal to 6 mg/L. The facility reported the following: concentration monthly avg. 27.6 mg/L; and concentration daily max. 27.6 mg/L for June 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]

**3** Violation Description for Subject Item AIOO000000479():

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. KY0091600, monitoring point 001-2, for Total Suspended Solids. The permitted limit for Total Suspended Solids is concentration monthly avg., less than or equal to 30 mg/L. The facility reported the following: concentration monthly avg. 34.4 mg/L for June 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.

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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 2, 2022



Lake Columbia 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:** Lake Columbia WWTP  
Alica Alexander  
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20210002

**County:** Bullitt

**Enforcement Case ID:**

**Date(s) Violation(s) Observed:** 09/01/2021

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

- 1** Violation Description for Subject Item AIOO0000000458():  
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. KY0077674, 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. The facility reported the following: concentration monthly avg. 43 mg/L for April 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.

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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, Environmental Control Manager

Date: September 29, 2021

Lake Columbia 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:** Lake Columbia WWTP  
Mandy Sappington  
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **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 AIOO0000000458():

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. KY0077674, 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. 5.6 mg/L for December 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]

**2** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, 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. 68.5 mg/L; and concentration max. weekly avg. 84 mg/L for December 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.

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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 20, 2023

Lake Columbia 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:** Lake Columbia WWTP  
Josiah Cox  
500 Northwest Plaza Dr Ste 500

Saint Ann, MO 63074

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20200002

**County:** Bullitt

**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:

**1** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, 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. 453 MPN/100 mL; and concentration 7-day geometric 453 MPN/100 mL for February 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]

**2** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, 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. The facility reported the following: concentration monthly avg. 34 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]

**3** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, monitoring point 001-1, for CBOD. The permitted limit for CBOD is loading monthly avg., less than or equal to 3 lbs/day. The facility reported the following: loading monthly avg. 4.128 lbs/day for February 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]

**4** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is loading monthly avg., less than or equal to 3 lbs/day; and loading max. weekly avg., less than or equal to 4.5 lbs/day. The facility reported the following: loading monthly avg. 6.755 lbs/day; and loading max. weekly avg. 6.755 lbs/day for February 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.

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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:

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Michael B. Kroeger, Assistant Director  
Date: May 22, 2020

Woodland Acres  
Mandy Sappington  
1630 Des Peres Rd Ste 140  
Des Peres , MO 63131





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

**NOTICE OF VIOLATION**

**To:** Woodland Acres  
Mandy Sappington  
1630 Des Peres Rd Ste 140  
**Des Peres , MO 63131**

**AI Name:** Woodland Acres    **AI ID:** 479    **Activity ID:** ENV20220001  
**County:** Bullitt  
**Enforcement Case ID:**  
**Date(s) Violation(s) Observed:** 03/21/2022, 05/09/2022

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

**1** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for Total Ammonia Nitrogen (as N). The permitted limit for Total Ammonia Nitrogen (as N) is concentration monthly avg., less than or equal to 10 mg/L; and concentration daily max., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 16.5 mg/L; and concentration daily max. 16.5 mg/L 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]

**2** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for CBOD. The permitted limit for CBOD is concentration monthly avg., less than or equal to 10 mg/L; and concentration max. weekly avg., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 16 mg/L; and concentration max. weekly avg. 16 mg/L 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]

**3** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, 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 avg., less than or equal to 240 MPN/100 mL. The facility reported the following: concentration 30-day geometric avg. 2420 MPN/100 mL; and concentration 7-day geometric avg. 2420 MPN/100 mL for March 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]

**4** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for CBOD. The permitted limit for CBOD is concentration monthly avg., less than or equal to 10 mg/L; and concentration max. weekly avg., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 22 mg/L; and concentration max. weekly avg. 22 mg/L for March 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]

**5** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for Total Ammonia Nitrogen (as N). The permitted limit for Total Ammonia Nitrogen (as N) is concentration monthly avg., less than or equal to 10 mg/L; and concentration daily max., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 18.6 mg/L; and concentration daily max. 18.6 mg/L for March 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]

**6** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, 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. 72 mg/L; and concentration max. weekly avg. 72 mg/L for March 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]

**7** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration daily max., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. 1.91 mg/L; and concentration daily max. 1.91 mg/L for March 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.

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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: August 18, 2022

Woodland Acres  
Michael Dick  
1650 Des Peres Rd Ste 303

Des Peres , MO 63131



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

**NOTICE OF VIOLATION**

To: Woodland Acres  
Michael Dick  
1650 Des Peres Rd Ste 303

Des Peres , MO 63131

**AI Name:** Woodland Acres    **AI ID:** 479    **Activity ID:** ENV20220001

**County:** Bullitt

**Enforcement Case ID:**

**Date(s) Violation(s) Observed:** 03/21/2022, 05/09/2022

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

**1** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for Total Ammonia Nitrogen (as N). The permitted limit for Total Ammonia Nitrogen (as N) is concentration monthly avg., less than or equal to 10 mg/L; and concentration daily max., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 16.5 mg/L; and concentration daily max. 16.5 mg/L 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]

**2** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for CBOD. The permitted limit for CBOD is concentration monthly avg., less than or equal to 10 mg/L; and concentration max. weekly avg., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 16 mg/L; and concentration max. weekly avg. 16 mg/L 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]

- 3 Violation Description for Subject Item AIOO0000000479():  
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. KY0091600, monitoring point 001-2, 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 avg., less than or equal to 240 MPN/100 mL. The facility reported the following: concentration 30-day geometric avg. 2420 MPN/100 mL; and concentration 7-day geometric avg. 2420 MPN/100 mL for March 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]

- 4 Violation Description for Subject Item AIOO0000000479():  
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. KY0091600, monitoring point 001-2, for CBOD. The permitted limit for CBOD is concentration monthly avg., less than or equal to 10 mg/L; and concentration max. weekly avg., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 22 mg/L; and concentration max. weekly avg. 22 mg/L for March 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]

- 5 Violation Description for Subject Item AIOO0000000479():  
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. KY0091600, monitoring point 001-2, for Total Ammonia Nitrogen (as N). The permitted limit for Total Ammonia Nitrogen (as N) is concentration monthly avg., less than or equal to 10 mg/L; and concentration daily max., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 18.6 mg/L; and concentration daily max. 18.6 mg/L for March 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]

- 6 Violation Description for Subject Item AIOO0000000479():  
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. KY0091600, monitoring point 001-2, 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. 72 mg/L; and concentration max. weekly avg. 72 mg/L for March 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]

**7** Violation Description for Subject Item AIOO0000000479():

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. KY0091600, monitoring point 001-2, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration daily max., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. 1.91 mg/L; and concentration daily max. 1.91 mg/L for March 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.

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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 26, 2022

Delaplain Disposal  
Michael Dick  
1650 Des Peres Rd Ste 303

Des Peres , MO 63131



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

**NOTICE OF VIOLATION**

**To:** Delaplain Disposal  
Michael Dick  
1650 Des Peres Rd Ste 303

Des Peres , MO 63131

**AI Name:** Delaplain Disposal **AI ID:** 479 **Activity ID:** ENV20210001

**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 AIOO0000000479():

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), which cites to 401 KAR 5:065, Section 2(1), by failing to comply with the monitoring and reporting requirements specified in KPDES Permit No. KY0091600, during the December 2020 monitoring period, for the following monitoring point(s): 001-2.

**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.

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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:

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Michael B. Kroeger, Assistant Director  
Date: June 3, 2021

Lake Columbia WWTP  
Mandy Sappington  
1630 Des Peres Rd Ste 140  
Des Peres, MO 63131





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

**NOTICE OF VIOLATION**

**To:** Lake Columbia WWTP  
Mandy Sappington  
1630 Des Peres Rd Ste 140  
Des Peres, MO 63131

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20220001  
**County:** Bullitt  
**Enforcement Case ID:**  
**Date(s) Violation(s) Observed:** 05/09/2022

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

- 1** Violation Description for Subject Item AIOO0000000458():  
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. KY0077674, 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. The facility reported the following: concentration monthly avg. 31 mg/L for January 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.

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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: June 24, 2022

Lake Columbia 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:** Lake Columbia WWTP  
Alica Alexander  
1650 Des Peres Rd Ste 303

Saint Louis, MO 63131

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20210001  
**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 AIOO0000000458():  
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. KY0077674, 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. The facility reported the following: concentration monthly avg. 32 mg/L for February 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.

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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:

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Michael B. Kroeger, Assistant Director  
Date: July 7, 2021

Lake Columbia 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:** Lake Columbia WWTP  
Mandy Sappington  
1630 Des Peres Rd Ste 140

Saint Louis, MO 631311871

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20220002

**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 AIOO0000000458():  
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. KY0077674, 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. 65 mg/L; and concentration max. weekly avg. 124 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.

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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 23, 2022

Lake Columbia 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:** Lake Columbia WWTP  
Josiah Cox  
500 Northwest Plaza Dr Ste 500

Saint Ann, MO 63074

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20200003

**County:** Bullitt

**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 AIOO0000000458():

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. KY0077674, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is loading monthly avg., less than or equal to 3 lbs/day; and loading max. weekly avg., less than or equal to 4.5 lbs/day; and 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: loading monthly avg. 20.63 lbs/day; and loading max. weekly avg. 20.63 lbs/day; and concentration monthly avg. 496 mg/L; and concentration max. weekly avg. 496 mg/L for April 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.

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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:

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Michael B. Kroeger, Assistant Director  
Date: October 15, 2020

Lake Columbia 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:** Lake Columbia WWTP  
Josiah Cox  
500 Northwest Plaza Dr Ste 500  
  
Saint Ann, MO 63074

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20190003  
**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 AIOO0000000458():

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. KY0077674, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is loading monthly avg., less than or equal to 3 lbs/day; and loading max. weekly avg., less than or equal to 4.5 lbs/day; and 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: loading monthly avg. 11.03 lbs/day; and loading max. weekly avg. 11.03 lbs/day; and concentration monthly avg. 88 mg/L; and concentration max. weekly avg. 88 mg/L 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]

**2** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, 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; and concentration max. weekly avg., less than or equal to 6 mg/L. The facility reported the following: concentration monthly avg. 7.8 mg/L; and concentration max. weekly avg. 7.8 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]

**3** Violation Description for Subject Item AIOO0000000458():

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), which cites to 401 KAR 5:065, Section 2(1), by failing to comply with the monitoring and reporting requirements specified in KPDES Permit No. KY0077674, during the August 2019 monitoring period, for the following monitoring point(s): 001-1.

**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.

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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:

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

Lake Columbia 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:** Lake Columbia WWTP  
Josiah Cox  
500 Northwest Plaza Dr Ste 500

Saint Ann, MO 63074

**AI Name:** Lake Columbia WWTP      **AI ID:** 458      **Activity ID:** ENV20190002  
**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 AIOO0000000458():  
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. KY0077674, monitoring point 001-1, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration max. weekly avg., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. 2.2 mg/L; and concentration max. weekly avg. 2.2 mg/L 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]

- 2 Violation Description for Subject Item AIOO0000000458():  
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. KY0077674, 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. 5.6 mg/L for July 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 AIOO0000000458():  
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. KY0077674, monitoring point 001-1, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration max. weekly avg., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. 1.27 mg/L; and concentration max. weekly avg. 1.27 mg/L for October 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]

- 4 Violation Description for Subject Item AIOO0000000458():  
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. KY0077674, monitoring point 001-1, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration max. weekly avg., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. .2 mg/L; and concentration max. weekly avg. .2 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 AIOO0000000458():  
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. KY0077674, 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. 60000 MPN/100 mL; and concentration 7-day geometric 60000 MPN/100 mL 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]

- 6 Violation Description for Subject Item AIOO0000000458():  
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. KY0077674, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is loading monthly avg., less than or equal to 3 lbs/day; and 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: loading monthly avg. 3.002 lbs/day; and concentration monthly avg. 60 mg/L; and concentration max. weekly avg. 60 mg/L for November 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]

**7** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, 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 lbs/day; and concentration monthly avg., less than or equal to 10 mg/L; and concentration max. weekly avg., less than or equal to 15 mg/L. The facility reported the following: loading monthly avg. 1.041 lbs/day; and concentration monthly avg. 31.2 mg/L; and concentration max. weekly avg. 31.2 mg/L 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]

**8** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, 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. 60000 MPN/100 mL; and concentration 7-day geometric 60000 MPN/100 mL 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]

**9** Violation Description for Subject Item AIOO0000000458():

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. KY0077674, monitoring point 001-1, for Total Residual Chlorine. The permitted limit for Total Residual Chlorine is concentration monthly avg., less than or equal to .011 mg/L; and concentration max. weekly avg., less than or equal to .019 mg/L. The facility reported the following: concentration monthly avg. 2.2 mg/L; and concentration max. weekly avg. 2.2 mg/L 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]

1 Violation Description for Subject Item AIOO0000000458():

0

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. KY0077674, monitoring point 001-1, for CBOD. The permitted limit for CBOD is concentration monthly avg., less than or equal to 30 mg/L. The facility reported the following: concentration monthly avg. 45 mg/L 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]

1 Violation Description for Subject Item AIOO0000000458():

1

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. KY0077674, 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 10 mg/L; and concentration max. weekly avg., less than or equal to 15 mg/L. The facility reported the following: concentration monthly avg. 40.1 mg/L; and concentration max. weekly avg. 40.1 mg/L 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]

1 Violation Description for Subject Item AIOO0000000458():

2

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. KY0077674, 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. 60000 MPN/100 mL; and concentration 7-day geometric 60000 MPN/100 mL for November 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]

1 Violation Description for Subject Item AIOO0000000458():  
3

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. KY0077674, monitoring point 001-1, for Total Suspended Solids. The permitted limit for Total Suspended Solids is loading monthly avg., less than or equal to 3 lbs/day; and loading max. weekly avg., less than or equal to 4.5 lbs/day; and 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: loading monthly avg. 5.004 lbs/day; and loading max. weekly avg. 5.004 lbs/day; and concentration monthly avg. 60 mg/L; and concentration max. weekly avg. 60 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]

1 Violation Description for Subject Item AIOO0000000458():  
4

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. KY0077674, 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. 54 mg/L; and concentration max. weekly avg. 54 mg/L 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]

1 Violation Description for Subject Item AIOO0000000458():  
5

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. KY0077674, 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 lbs/day; and loading max. weekly avg., less than or equal to 1.5 lbs/day; and concentration monthly avg., less than or equal to 10 mg/L; and concentration max. weekly avg., less than or equal to 15 mg/L. The facility reported the following: loading monthly avg. 2.008 lbs/day; and loading max. weekly avg. 2.008 lbs/day; and concentration monthly avg. 34.4 mg/L; and concentration max. weekly avg. 34.4 mg/L 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]

**1** Violation Description for Subject Item AIOO0000000458():

**6**

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), which cites to 401 KAR 5:065, Section 2(1), by failing to comply with the monitoring and reporting requirements specified in KPDES Permit No. KY0077674, during the April 2019 monitoring period, for the following monitoring point(s): 001-1.

**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]

**1** Violation Description for Subject Item AIOO0000000458():

**7**

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), which cites to 401 KAR 5:065, Section 2(1), by failing to comply with the monitoring and reporting requirements specified in KPDES Permit No. KY0077674, during the June 2019 monitoring period, for the following monitoring point(s): 001-1.

**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]

**1** Violation Description for Subject Item AIOO0000000458():

**8**

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), which cites to 401 KAR 5:065, Section 2(1), by failing to comply with the monitoring and reporting requirements specified in KPDES Permit No. KY0077674, during the May 2019 monitoring period, for the following monitoring point(s): 001-1.

**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.

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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:

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