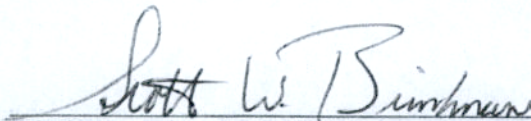


ORDER

Wherefore, the foregoing Agreed Order is entered as the final Order of the Energy and Environment Cabinet this 2<sup>nd</sup> day of October, 2019.

ENERGY AND ENVIRONMENT CABINET



SCOTT W. BRINKMAN, SECRETARY of the  
GOVERNOR'S EXECUTIVE CABINET

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing **AGREED ORDER** was mailed, postage prepaid, to the following this 2nd day of October, 2019.

Paducah McCracken Joint Sewer Agency  
Attn: Mr. John C. Hodges  
621 Northview Street  
Paducah, KY 42001

And mailed, messenger to:

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

John G. Horne II, Executive Director  
Office of Legal Services  
Energy and Environment Cabinet  
300 Sower Boulevard  
Frankfort, Kentucky 40601

  
\_\_\_\_\_  
DOCKET COORDINATOR

Distribution:

DOW  
BGD  
S&H  
FBT



# EXHIBIT A

Paducah-McCracken Joint Sewer  
Agency, as receiver for the Great Oaks  
Treatment Plant

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**OPERATION AND MAINTENANCE PLAN**  
For the  
**WASTEWATER COLLECTION SYSTEM AND FACILITIES**

**August, 2019**



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# **OPERATION AND MAINTENANCE PLAN for the WASTEWATER COLLECTION SYSTEM AND FACILITIES**

## **INTRODUCTION**

The Paducah McCracken County Joint Sewer Agency (JSA) is the regional provider of comprehensive wastewater services for the City of Paducah and McCracken County Kentucky community. Contingent upon an Agreed Order to be issued to JSA by the Division of Enforcement of the Kentucky Energy and Environmental Cabinet (DENF) that acknowledges and accepts the procedures as outlined in this Operation and Maintenance (O&M) Plan in its entirety, JSA has developed this O&M plan as guidance for the term of the temporary receivership with the intent to make good faith efforts to effectively operate the existing system, equipment and facilities; and to the extent feasible by limitations of the current status of equipment and funding, address temporary, short-term remedial measures for failures or deficiencies the Great Oaks Treatment Plant (GOTP) wastewater treatment and collection system may experience during the receivership period.

The O&M of these systems and facilities are explicitly subject to and limited by the existing condition of the assets owned by the GOTP. This plan addresses O&M associated with operation of existing facilities to reduce the potential for sanitary system overflows (SSO's) and Kentucky Pollution Discharge Elimination System (KPDES) permit exceedances at the wastewater treatment facilities.

JSA will:

- Implement an Operation and Maintenance Plan for the GOTP sanitation system during the receivership period
- Update the plan to incorporate any substantial changes to the system
- Maintain the system according to the plan
- Keep records to document the implementation of the plan
- Properly train personnel to implement the plan

This document outlines JSA's operations and maintenance program and shall serve as the O&M plan for the sanitary sewer system, along with the wastewater treatment facilities.



## **OBJECTIVE**

The objective of this document is to establish the operation and maintenance procedures for facilities and equipment owned by GOTP. This document will:

- Enumerate the facilities that are maintained as part of the system
- Outline technology utilized by JSA in its O&M program
- Specify personnel responsible for implementation of the O&M program
- Document JSA's O&M procedures
- Outline procedures for emergency situations
- Discuss JSA's O&M training procedures

## **GOTP BACKGROUND INFORMATION**

The GOTP is a private treatment and collection system owned and operated by Marshall County Environmental Services (MCES), who is responsible for the proper operation and maintenance of the assets, equipment and facilities collecting and treating wastewater within the Great Oaks subdivision. Customers within this system have been paying rates established by GOTP for proper collection and treatment under the jurisdiction of the Public Service Commission (PSC). Bluegrass Water Utility Company, LLC (BWUC), has filed an application with PSC to acquire the assets owned by MCES, including the GOTP. DENF has determined that the GOTP requires a temporary receiver under Kentucky Revised Statutes (KRS) 224.73-150, until such acquisition is completed. JSA has been asked to assume the role of Receiver of the GOTP and its assets and revenues. JSA as receiver will, to the extent feasible by limitations of the current status of equipment and funding, perform the necessary O&M procedures to minimize the potential for SSO's associated with the sewer collection system, and operate the existing WWTP in a manner conducive to meeting KPDES permit number KY0080845 effluent standards.

In the interim period, it is the responsibility of JSA personnel while acting as temporary receiver of this system, to the extent feasible by limitations of the current status of equipment and funding, properly implement the O&M Plan to mitigate existing substandard conditions and environmental impact that have been previously cited by DENF for improper or inappropriate operation and maintenance of the facilities.



## **GOTP FACILITIES**

### **Treatment Facilities**

The GOTP serves approximately 157 customers in southwest McCracken County and operates one wastewater treatment facility. This facility operates under KPDES Permit No: KY0080845 and is a conventional aeration packaged treatment plant with a permitted capacity of 70,000 gallons per day (gpd) which discharges into the Blizzard Pond Drainage Canal. The wastewater sludge generated by this facility may be dewatered and disposed of at a local landfill, although previous frequency and method of sludge disposal is unknown. The current method of disinfection involves chlorination by means of chlorine tablets and de-chlorination methods are unknown, if any.

### **Collection Systems**

The collection system serves approximately 157 customers in the Great Oaks Subdivision. This manual will address the O&M of the facilities associated with the described collection systems. JSA as temporary receiver, to the extent feasible by limitations of the current status of equipment and funding, will identify and remedy known collection system failures within the system that result or may potentially result in SSO's.

### **Pump Stations**

GOTP operates and maintains one pump station within the collection system and one pump station at the head of the WWTP. JSA as receiver, to the extent feasible by limitations of the current status of equipment and funding, will maintain and operate this pump station and existing equipment.



## **TECHNOLOGY**

JSA as receiver plans to utilize remote alarming/telemetry to identify and respond to failures associated with existing equipment as expeditiously as possible. Utilizing these technologies creates efficiencies in system operation and maintenance. The following technologies are planned to be incorporated into various aspects of O&M.

### **Flow Metering**

JSA as receiver will rely on existing flow metering devices to record treated flows as accurately as possible. JSA believes that no flow metering devices currently exist at the treatment plant. As such, JSA will attempt to utilize flow measuring devices in conjunction with an Omni-Site telemetry unit to monitor the elevation of the water level within the pump station and to calculate flow to the treatment plant as accurately as possible with the unit. This Omni-Site unit will be installed on the pump station upon initiation of JSA as temporary receiver. This unit is currently owned by JSA and will be removed upon termination of JSA as temporary receiver, and remain JSA property.

### **Remote Monitoring and Advanced Telemetry**

As stated above, JSA will attempt to utilize devices to monitor well levels and other pump station equipment parameters in conjunction with existing equipment diagnostic means to provide alarm notifications to operators and maintenance staff in response to equipment failures or trouble conditions. Devices such as Omni-Site units are proposed for this task.



## **PLANNING AND BUDGETING PROCEDURES FOR RECEIVERSHIP PERIOD**

Planning efforts associated with the O&M of the GOTP sanitary system is the responsibility of JSA's Engineering and Operations Director in coordination with the Executive Director and Finance Director. It is intended that input from the Directors will coordinate the activities associated with the collection system and treatment plant to the extent feasible by limitations of the current status of equipment and funding.

## **RESPONSIBILITY OF O&M PROGRAM ADMINISTRATION**

The administration of the program, policies and procedures associated with the O&M lies with the JSA's Engineering and Operations Director, in coordination with the Executive Director. JSA will utilize existing staff, which includes two Class IV wastewater treatment plant (WWTP) Operators to operate the WWTP and perform requisite process adjustments and record keeping duties. The O&M responsibilities associated with the maintenance of the equipment, collection system and facilities will be performed on an as-needed basis and be completed by JSA or a contractor during the receivership period, to the extent feasible by limitations of the current status of equipment and funding. JSA will respond to remote alarms and public requests on a 24/7 schedule. Further, the Engineering and Operations Director is responsible for notification to the appropriate regulatory agencies should an overflow event occur.

## **PROPER O&M OF FACILITIES AND EQUIPMENT**

JSA has performed a very limited partial inspection of the facilities related to GOTP. It is anticipated, based on limited inspection, that significant dewatering and cleaning of the treatment plant and influent pump station may be required prior to eliminating the SSO and achieving even partial compliance with the KPDES effluent standards associated with the treatment plant.

### **Treatment Plant**

The designated Operator shall manage and maintain proper operation of the plant site, equipment, infrastructure and chemical dosing in accordance with permit requirements and in accordance with 401 KAR 11:020. The designated operator shall be responsible to record all requisite data in compliance with KY Division of Water reporting standards and shall be responsible to transmit records/data to JSA acting as temporary receiver of GOTP. Operational duties shall include a weekly site visit to accomplish the following:

- a) Plant operation and general maintenance
- b) Process sampling as required
- c) Equipment adjustment, monitoring and management
- d) Data collection, records transmittal and paper/electronic reporting
- e) Permit/DMR sampling and coordination with designated certified laboratory (including JSA's certified laboratory). JSA will submit DMR reports for the months they operate the plant, not for former months.



- f) Chemical handling/dosing and management for chlorination. Dechlorination is currently not feasible with the existing equipment at the GOTP and will not be performed, with the exception of any natural dechlorination occurring during the discharge process.
- g) Sludge pumping coordination

Currently, there is no equipment available at the site to properly adjust pH concentrations, effluent dissolved oxygen concentrations (minus a rudimentary air bubble system) or to provide for dechlorination, if required. During the temporary receivership period, JSA does not propose to add this equipment.

### **Pump Stations and Equipment**

Pump station maintenance and repairs shall be performed on an as-needed basis. General maintenance of all equipment, facilities, structures, pipes and appurtenances shall be completed as required to ensure continual operation of the collection and treatment systems, to the extent feasible by limitations of the current status of equipment and funding. Preventative maintenance shall be carried out on a regularly scheduled basis to maximize existing equipment and facility operability. Collection system, pump station and treatment plant maintenance duties shall include the following:

- a) Regularly scheduled equipment diagnostic checks, preventative maintenance and repairs as required
- b) Facilities general repairs as required
- c) Pipes, valves, misc. appurtenances preventative maintenance and repairs as required
- d) Work Order record keeping, tracking, reporting and transmittal
- e) After hours or on-call [24/7] equipment repairs as required/notified via remote station monitoring devices or public work request
- f) Sludge pumping supervision

### **Maintenance of Pipe Network**

JSA will respond to reported failures or backups within the collection system on a 24/7 on-call basis. JSA will make necessary repairs to remedy existing and mitigate potential future SSO's due to pipe collapse or blockages.

### **O&M TRAINING**

Assigned personnel will be trained on the specific aspects of O&M associated with the GOTP sanitation system. The Executive Director and Engineering and Operations Director, in coordination with JSA supervisors will develop the nature and scope of training necessary for respective staff and contractors. Once trained, it is intended that all staff and contractors will communicate in a manner to ensure that O&M activities are efficiently coordinated and documented.

### **SEWER OVERFLOW RESPONSE PLAN (SORP) TRAINING**



JSA's O&M personnel affected by requirements in JSA's adopted Sewer Overflow Response Plan (SORP) are trained in the proper reporting and response procedures associated with JSA's system in accordance with Cabinet and statutory requirements. Staff and contractors associated with the O&M of the GOTP sanitary system will be trained annually and documentation of training will be recorded. SORP is reviewed annually by JSA Directors and modified as needed.

### **SAFETY TRAINING**

JSA employs subcontract safety professionals to implement a safety program which includes the inspection of facilities regarding safety hazards, understanding the potential for unsafe conditions, understanding field and plant operations and the proper training of personnel associated with each of these aspects of safety. Safety training is conducted throughout the year, with mandatory annual training including confined space, trenching and shoring, lockout/tagout, hazardous material, First-Aid and CPR, etc. JSA, acting as temporary receiver shall adhere to all existing JSA safety standards and procedures in the O&M of GOTP sanitary system.

### **EMERGENCY PROCUREMENT**

In emergency situations, JSA will procure the necessary items to provide protection to the public and the environment. JSA is required to follow the Kentucky Model Procurement Code; however, the Code has provisions that allow agencies to procure necessary items during times of emergency. In such cases, JSA completes a written determination that outlines the emergency situation, the item(s) to be procured, the method to select the vendor, the reason competition is not feasible, etc. JSA acting as temporary receiver of GOTP shall utilize this same protocol.



# Scanning Batch Sheet

**Prepped by:** Amber Hawkins      **Return to:** Amber Hawkins

Color		11 x 17	Maps
Duplex		CD	Recycle
8.5 x 11		Other	

<b>Agency Interest (AI) Number:</b>	3041
<b>Program Code:</b>	11
<b>Document Type Code:</b>	eoard
<b>Function Area Code:</b>	004
<b>View Attribute:</b>	2
<b>Activity ID (Grey Bar):</b>	ERF20170001
<b>Assign To (Tempo Login):</b>	HawkinsAM
<b>Document Title:</b>	Executed Receiver Agreed Order

Batch Name: 13      ←--- (Scan staff will complete)

Air Quality		Comp. & Tech Asst.	Permit Support – Surface Water
Enforcement	X	Compliance Lab Cert.	SRF & SPSP
Hazardous Waste		Construction & Compliance	Surface Water
Recycling & Local Asst.		Dam Safety & Floodplain	Waste Water Mun. Planning
Solid Waste		Engineering –Surface Water	Water Infrastructure
Superfund		Floodplain Mgmt.	Water Quality
Underground Storage Tank		Groundwater	Watershed Mgmt.
Capacity Development		Operational Permits	Wet Weather

**Program Misc. Information:**

Great Oaks

REC

SCANNED

OCT 25 2019

QUALITY CHECK