



MATTHEW G. BEVIN
GOVERNOR

CHARLES G. SNAVELY
SECRETARY

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF WATER
130 EAGLE NEST DR
PADUCAH KY 42003-9435

AARON B. KEATLEY
COMMISSIONER

January 12, 2017

Certified No. 7014 0510 0002 3570 6023
Return Receipt Requested

Mr. Lyndall Groves
Marshall Co Sanitation District 1 WWTP
P.O. Box 432
Benton, KY

Re: Notice of Violation
AI ID: 2952
AI Name: Marshall Co Sanitation District 1
WWTP
Activity ID: ENV20170001
Permit No. KY0024546
Marshall County, KY

Dear Mr. Groves,

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

Your cooperation and attention to this matter is appreciated. If you have any questions, please contact me at 270-898-8468.

Sincerely,

Jessie York,
Environmental Scientist
Division of Water

Enclosure: Inspection Report, Notice of Violation

COMMONWEALTH OF KENTUCKY
ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
Division of Water

NOTICE OF VIOLATION

To: Marshall Co Sanitation District 1 WWTP
100 Cherokee Ln
Aurora, KY 42408

AI Name: Marshall Co Sanitation District 1 WWTP AI ID: 2952 Activity ID: ENV20170001
Discovery ID: CIN20170001 County: Marshall
Enforcement Case ID:
Date(s) Violation(s) Observed: 01/05/2017

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

1 Violation Description for Subject Item AIOO0000002952():

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report, or application. This period may be extended by request of the cabinet at any time. [40 C.F.R. 122.41(j)(2)]

Description of Non Compliance:

The facility has failed to maintain required records.

Instrument calibration logs were not available. Calibration logs shall be maintained for a minimum of 3 years and be available for review upon request. Calibration shall be conducted per manufacturer's specifications. Calibration verification shall be conducted with each day of use.

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

Upon the receipt of this notice, the permittee shall comply with all recordkeeping requirements specified in the permit. Within thirty (30) days of the receipt of this notice, the permittee shall submit a written notification to the undersigned that the permittee complies with all requirements of its permit. Failure to comply with the remedial measures or repeated violations of this requirement may subject you and/or your company to an immediate referral to the Division of Enforcement. [401 KAR 5:065 Section 2(1)]

2 Violation Description for Subject Item AIOO0000002952():

Any person required to prepare and implement a Groundwater Protection Plan (GPP) pursuant to 401 KAR 5:037, Section 2, shall prepare and implement a site-specific or generic GPP upon commencement of the regulated activity. [401 KAR 5:037 Section 3]

Description of Non Compliance:

A GPP has not been developed or implemented. GPPs shall be developed and submitted to the DOW Groundwater Section for approval. GPPs shall be updated every 3 years and be available for review upon request.

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

The facility shall develop and implement a GPP as required. A written copy of the GPP must be maintained onsite. Within thirty (30) days of the receipt of this notice, the permittee shall develop and implement a Groundwater Protection Plan and submit to the undersigned. Failure to comply with the remedial measures or repeated violations of this requirement may subject you and/or your company to an immediate referral to the Division of Enforcement. [401 KAR 5:037 Section 3]

3 Violation Description for Subject Item AIOO0000002952():

Monitoring results shall be reported at the intervals specified in the permit. [401 KAR 5:065 Section 2(1)] as in [40 CFR 122.41(1)(4)]

Description of Non Compliance:

The facility has failed to submit monitoring results at intervals specified in the permit.

Sept, Oct, and Nov 2016 DMRs have not been submitted.

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

The permittee must begin reporting monitoring results at the intervals specified in the permit. Any permit non-compliance shall constitute a violation of KRS 224, among which shall be the following remedies: Enforcement action, permit revocation, revocation and reissuance, or modification; or denial of permit renewal application. Failure to comply with the remedial measures or repeated violations of this requirement may subject you and or your company to an immediate referral to the Division of Enforcement. [401 KAR 5:065 Section 2(1)]

4 Violation Description for Subject Item AIOO0000002952():

Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control and related appurtenances which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. [401 KAR 5:065 Section 2(1)] as in [40 CFR 122.41(e)]

Description of Non Compliance:

The facility is not being properly operated and maintained as required.

Severe corrosion issues exist throughout the clarifier and aeration basins. These issues were identified in a DOW compliance evaluation inspection on 9/22/15. The facility received an NOV for these violations on 10/1/15 and has failed to adequately address them. The skimmer was not in operation at the time of the inspection. Mr. Groves planned to have it fixed by 1/7/16.

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

The permittee must, at all times, properly operate & maintain the facility. With proper approval(s) from the Division of Water, upgrade/update the facility in order to meet the regulatory requirements and facility permit conditions. Within thirty (30) days of the receipt of this notice, the permittee shall submit a written notification to the undersigned that the permittee complies with all requirements of its permit. Failure to comply with the remedial measures or repeated violations of this requirement may subject you and/or your company to an immediate referral to the Division of Enforcement. [401 KAR 5:065 Section 2(1)]

5 Violation Description for Subject Item AIOO0000002952():

All wastewater treatment plants shall have a disinfection process which meets the following requirements: An ultraviolet disinfection system designed to treat the anticipated peak hourly flow; a chlorination system with a flow or demand proportional feed system. The chlorine contact tank shall have a minimum detention time of thirty (30) minutes based on the average flow, or fifteen (15) minutes based on the peak hourly flow, whichever requires the larger tank size. Wastewater treatment plants shall also have a dechlorination system with a flow or demand proportional feed system if necessary to meet the effluent limits; or a chlorination system with a manually controlled feed system and a flow equalization basin designed to eliminate the diurnal flow variations. Tablet type chlorination equipment shall not be used in an intermediate or large WWTP. [401 KAR 5:005 Section 11]

Description of Non Compliance:

The facility has failed to properly maintain and / or operate the disinfection unit.

Multiple effluent limitation violations for E. coli throughout 2016. The facility uses peracetic acid for disinfection.

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

The permittee must immediately maintain and operate the disinfection unit to allow for compliance with permit conditions. Within thirty (30) days of the receipt of this notice, the permittee shall submit a written notification to the undersigned that the permittee complies with all requirements of its permit. Failure to comply with the remedial measures or repeated violations of this requirement may subject you and/or your company to an immediate referral to the Division of Enforcement. [401 KAR 5:005 Section 11]

6 Violation Description for Subject Item AIOO0000002952():

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and KRS 224 and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [401 KAR 5:065 Section 2(1)]

Description of Non Compliance:

The facility has failed to comply with the effluent limitations contained in the permit.

Multiple effluent limitation violations for BOD, TSS, N, chlorine residual, and E. coli throughout 2016.

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

The permittee must comply with effluent limitations and all conditions of the KPDES permit. Within thirty (30) days of the receipt of this notice, the permittee shall submit a written notification to the undersigned that the permittee complies with all requirements of its permit. Failure to comply with the remedial measures or repeated violations of this requirement may subject you and/or your company to an immediate referral to the Division of Enforcement. [401 KAR 5:065 Section 2(1)]

7 Violation Description for Subject Item AIOO0000002952():

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and KRS 224 and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [40 C.F.R. 122.41(a)]. [401 KAR 5:065 Section 2]

Description of Non Compliance:

The facility has failed to comply with the terms of the permit.

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

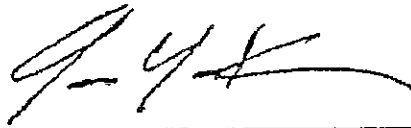
Comply with all conditions of the KPDES permit. Failure to comply with the remedial measures or repeated violations of this requirement may subject you and/or your company to an immediate referral to the Division of Enforcement. [401 KAR 5:065 Section 2]

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:

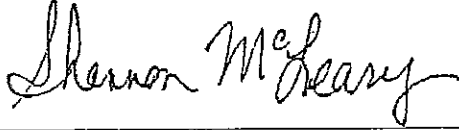
Division of Water
Paducah Regional Office
130 Eagle Nest Dr
Paducah, KY 42001
270-898-8468 (8:00 AM – 4:30 PM)
Jessie York, Environmental Scientist

Issued By:



Jessie York, Environmental Scientist
Date: January 12, 2017

Issued By:



Shannon Mcleary, Environmental Control Supervisor
Date: January 12, 2017

How Delivered: Certified Mail
Certified/Registered # 7014 0510 0002 3570 6023

Energy and Environment Cabinet
Department for Environmental Protection
Division of Water
Wastewater Inspection Report

AI ID: 2952 **AI Type:** SANI-Wastewater Treatment & Collection (2213)
AI Name: Marshall Co Sanitation District 1 WWTP
AI Address: 100 Cherokee Ln
City: Aurora, **State:** Kentucky **Zip:** 42408
County: Marshall **Regional Office:** Paducah Regional Office
Latitude: 36.773056 **Longitude:** -88.136389
Site Contact: Lyndall Groves
Title: Certified Operator **Phone #:** 270-205-7959
Inspection Type: WW CEI-Minor Mun **Activity #:** CIN20170001
Inspection Start Date: January 5, 2017 **Time:** 09:00 AM **End Date:** January 5, 2017 **Time:** 11:00 AM
Site/Permit ID: KY0024546

Lead DEP Investigator: Jessie York
Other DEP Investigators:
External Investigators:
Persons Interviewed: Jason Pickard; Lyndall Groves

General Comments: This inspection was conducted to evaluate the facilities compliance with KPDES permit no. KY0024546, which expires on 7/31/17. Jason Pickard and certified operator Lyndell Groves were present during the inspection. Less Landers left in April 2016 and Mike Laytom left on 8/21/16. Mr. Groves is the new certified operator for the facility and Mr. Pickard will be taking his certification test as soon as possible. BMP plan has not been developed. A BMP plan shall be developed and submitted to the DOW. The plan shall be implemented as soon as possible and be available for review at the facility. This plan shall be updated whenever there is a change in the facility or change in the operation of the facility. GPPs shall be developed and submitted to the DOW Groundwater Section for approval. GPPs shall be updated every 3 years. Meter calibration logs were not available for review. Meters shall be calibrated per manufacturer's specifications. Calibration verification shall be conducted with each day of use. A calibration log shall be maintained at the facility for review. DMRs show multiple effluent limitation violations for BOD, TSS, N, Chlorine, and E. coli throughout 2016. DMRs for Sept, Oct, and Nov of 2016 have not been submitted. The facilities field lab certification is due for renewal. Severe corrosion issues exist throughout the clarifier and aeration basins. The skimmer was not in operation at the time of the inspection. Mr. Groves planned to have it fixed by 1/7/16.

Overall Compliance Status: Out of Compliance- NOV

Investigation Results

SI: AIOO2952

SI Description:

Inspector Comment:

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

Compliance Status: C-No Violations observed

Comment: KY0024546

Expires: 7/31/17

Requirement: Have all required permits been obtained from the Division of Water prior to the construction or modification of the facility? [401 KAR 5:005 Section 1]

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the facility being operated under the supervision of a properly certified operator? [401 KAR 5:010 Section 1]

Compliance Status: C-No Violations observed

Comment: Lyndall Groves
WW Treatment II 8682

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

Compliance Status: C-No Violations observed

Comment: Lyndall Groves
WW Collection II 24445

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

Compliance Status: V-Out of Compliance-NOV

Comment: The facility has failed to maintain required records.
DMRs, COCs, Certificates of Analysis available for review. Instrument calibration logs not available.

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

Compliance Status: V-Out of Compliance-NOV

Comment: A GPP has not been developed or implemented.

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

Compliance Status: V-Out of Compliance-NOV

Comment: The facility has failed to submit monitoring results at intervals specified in the permit.

Sept, Oct, and Nov 2016 DMRs have not been submitted.

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

Compliance Status: C-No Violations observed

Comment: NetDMR

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

Compliance Status: N-Not Applicable

Comment:

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

Compliance Status: C-No Violations observed

Comment:

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

Compliance Status: C-No Violations observed

Comment:

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

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the facility being properly operated and maintained as specified in regulation 5:065? This includes: (a) proper operation and maintenance of all facilities, systems of treatment and control, and related appurtenances

Preparing a GROUNDWATER PROTECTION PLAN

By including everything described in this outline, with details, your GPP will be in compliance with 401 KAR 5:037.

Date of Plan

Section A. GENERAL INFORMATION

1. Name, Address and Location of Facility or Project
2. Name and contact information of Person Developing GPP
3. Name(s) and contact information Person(s) Responsible for Implementing GPP and authorized representative
4. Brief Description of Project or Facility

Section B. ACTIVITIES THAT HAVE THE POTENTIAL TO POLLUTE GROUNDWATER

- List all the activities that are conducted at your facility that require a GPP.
- Include details.

Section C. PRACTICES SELECTED TO PROTECT GROUNDWATER FROM POLLUTION

- For each activity listed in Section B, briefly describe the practice (Best Management Plan) that will be used to protect groundwater.
- Include details.
- If any of your activities listed in Section B are regulated under another program, you may incorporate them by reference.

Section D. IMPLEMENTATION SCHEDULE

- The GPP must be implemented immediately.
- If all protective practices are being implemented already, state so. If protective equipment or devices must be ordered or built, list what is to be done and prospective date by which the protective practice will be completed.

Section E. EMPLOYEE TRAINING

- Briefly describe topics to be covered in training the employees about groundwater protection practices.
- State the frequency of training sessions; be specific.

Section F. INSPECTION SCHEDULE

- State the frequency of the inspections and what is to be inspected.
- Include an Inspection Checklist, and save all inspections. This documents that you are following your GPP.

Section G. CERTIFICATION STATEMENT

I, _____, certify that this Groundwater Protection Plan complies with the requirements of 401 KAR 5:037. I have read the terms of the plan and will implement its provisions.

Signature

Date

Section H. RECORD RETENTION REQUIREMENT

- Specify how public requests for viewing your GPP will be handled.
- Retain the GPP and all compliance records for 6 years.

*Remember to review your entire GPP every 3 years and revise your plan at any time changes occur.



Review of Groundwater Protection Plans (GPPs)

Field Review by Kentucky Division of Water

State inspectors may periodically conduct a field review to make sure you have a complete and acceptable GPP located where it can be of use.

Formal Review by Kentucky Division of Water

If you wish, you may submit your GPP to the Groundwater Section in Frankfort. If your GPP is technically complete and acceptable as protective of the groundwater for the activities described at your site or project, you will receive a letter to that effect.

If the GPP you submit is not acceptable, you will receive information describing what it needs to make it acceptable, and then you may make the corrections and resubmit it if desired.

Note that the submittal of your GPP for review and approval is optional unless required by:

- a Department for Environmental Protection Inspector or program,
- the GPP Program, or
- an Agreed Order.

The outline shown on the reverse side is the MINIMUM information that a Groundwater Protection Plan must include to be considered complete and within regulation.

Any GPP not containing this minimum information is considered incomplete and is in violation of 401 KAR 5:037.

We can help!

Ask questions, or submit your GPP, to susan.mallette@ky.gov, direct line 502-782-7006, switchboard 502-564-3410.

Groundwater Protection Plan Program
Watershed Management Branch
Division of Water
300 Sower Boulevard, Third Floor
Frankfort, KY 40601



Keyword: "KY GPP"

**Activities requiring a GPP
per 401 KAR 5:037 section 2.2**

- (a) Storing or related handling of bulk quantities of pesticides or fertilizers for commercial purposes;
- (b) Storing or related handling of bulk quantities of pesticides or fertilizers for the purpose of distribution to a retail sales outlet;
- (c) Applying of pesticides or fertilizers for commercial purposes;
- (d) Applying of fertilizers or pesticides for public right-of-way maintenance or institutional lawn care;
- (e) Land treatment or land disposal of a pollutant;
- (f) Storing, treating, disposing, or related handling of hazardous waste, solid waste, or special waste in landfills, incinerators, surface impoundments, tanks, drums or other containers, or in piles;
- (g) *Commercial or industrial storing or related handling in bulk quantities of raw materials, intermediate substances or products, finished products, substances held for recycling, or other pollutants held in tanks, drums or other containers, or in piles;*
- (h) Transmission in pipelines of raw materials, intermediate substances or products, finished products, or other pollutants;
- (i) Installation or operation of on-site sewage disposal systems;
- (j) Storing or related handling of road oils, dust suppressants, or deicing agents at a central location;
- (k) Application or related handling of road oils, dust suppressants or deicing materials;
- (l) Mining and associated activities;
- (m) Installation, construction, operation, or abandonment of wells, bore holes, or core holes;
- (n) Collection or disposal of pollutants in an industrial or commercial facility through the use of floor drains which are not connected to on-site sewage disposal systems, closed-loop collection or recovery systems, or a waste treatment system permitted under the Kentucky Pollutant Discharge Elimination System;
- (o) Impoundment or containment of pollutants in surface impoundments, lagoons, pits, or ditches; or
- (p) Commercial or industrial transfer, including loading and unloading, in bulk quantities of raw materials, intermediate substances or products, finished products, substances held for recycling, or other pollutants.

FAQs:

What if I have questions or need help with GPPs?
The Groundwater Section can answer your question and assist you developing your GPP.

Who is qualified to develop a GPP?
Anyone familiar with the operations of the facility can create the GPP; no special qualifications or certifications are required.

What is the regulation?
401 KAR 5:037
The regulation concerning Groundwater Protection Plans can be found on the GPP website, at LRC <http://www.lrc.state.ky.us/kar/401/005/037.htm>, or by using search engine keywords: 401 KAR 5:037

**For more information please call, email,
or visit the website!**

LET US HELP YOU BE WATER WISE!

**Groundwater Protection Plan Program
Groundwater Section
Watershed Management Branch
Division of Water
300 Sower Boulevard
Frankfort, KY 40601**

**susan.mallete@ky.gov
502-782-7006 (Direct Line)
502-564-3410 (Switchboard)**

**<http://water.ky.gov/groundwater/Pages/groundwaterprotection>,
or search keywords: "KY GPP"**

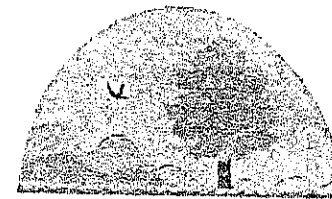


**Groundwater Protection
Plans
(GPPs)**

401 KAR 5:037



**PROTECT OUR
GROUNDWATER!**



**KY Department for Environmental Protection
<http://dep.ky.gov/>**

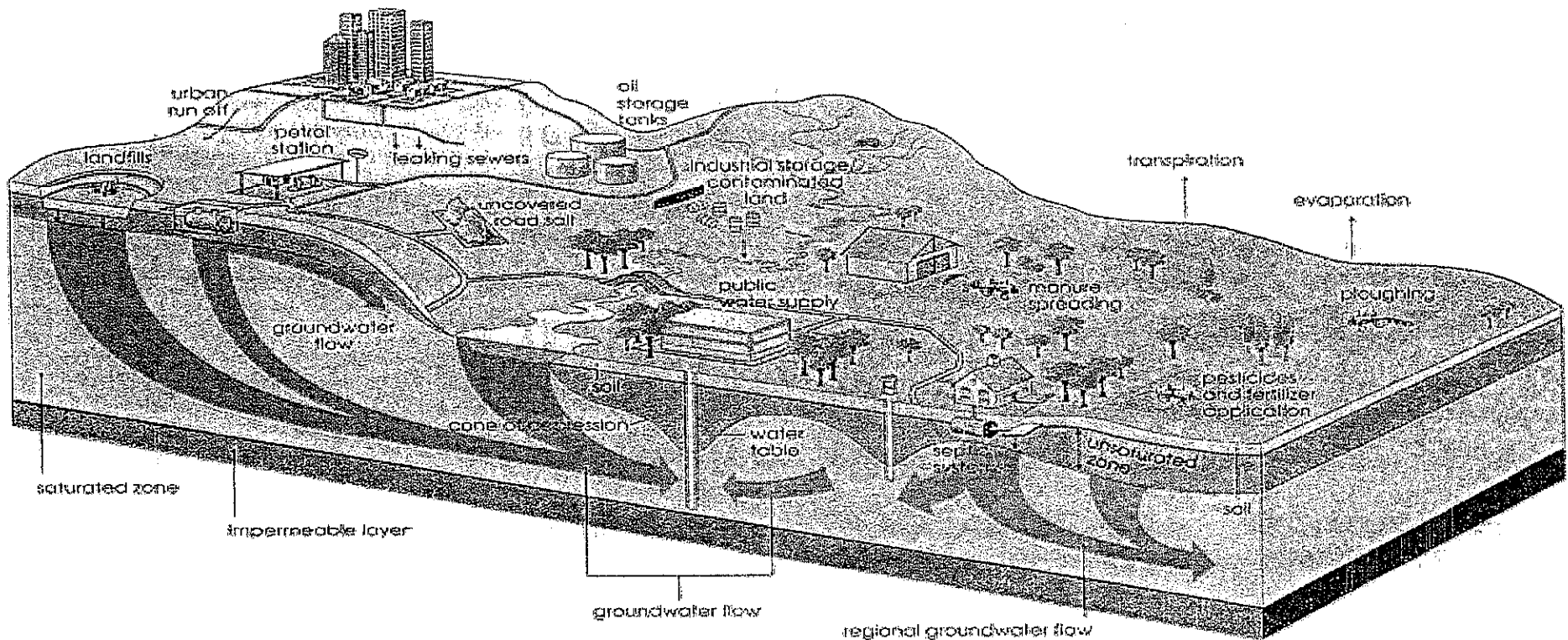


Image Credit: United Nations Environment Programme, Division of Technology, Industry and Economics

What is Groundwater?

Groundwater is water below the land surface that flows through cracks and spaces found in soil and rocks. Rain is the primary source of water for groundwater systems and as a result, any contaminant that comes in contact with the surface or with rainwater may soak into the ground and pollute the groundwater system.

Why worry about protecting groundwater?

Groundwater is the source of drinking water for many public water supplies and many private water well users. Nearly 2 million people in Kentucky rely on groundwater as their source of drinking water!

What is a Groundwater Protection Plan (GPP)?

A GPP identifies activities at a site that have the potential to pollute groundwater and defines the best management practices (BMPs) to use to protect the groundwater.

Why are Groundwater Protection Plans important?

A GPP describes actions that protect groundwater for all current and future uses. When implemented properly, it reduces the potential for groundwater contamination through prevention and mitigation.

Do I need a GPP for my activities?

In many cases, **YES!** However, there are some exceptions. Please refer to the regulation 401 KAR 5:037, or contact the Groundwater Section for assistance.

How will a GPP benefit me?

A GPP will list actions that need to be taken to contain potential pollutants. It can save you money by not wasting product. The document may also have primary contact information for individuals and agencies that must be notified if a spill occurs.

IT'S EVERYONE'S RESPONSIBILITY TO PROTECT GROUNDWATER!

which are installed or used by the permittee to achieve compliance with permit conditions;
(b) proper operation and maintenance also includes adequate laboratory controls, and appropriate quality assurance procedures; (c) this provision also requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. [401 KAR 5:065 Section 2(1)]
Compliance Status: V-Out of Compliance-NOV
Comment: The facility is not being properly operated and maintained as required.

Severe corrosion issues exist throughout the clarifier and aeration basins. The skimmer was not in operation at the time of the inspection. Mr. Groves planned to have it fixed by 1/7/16.

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

Compliance Status: V-Out of Compliance-NOV

Comment: The facility has failed to properly maintain and / or operate the disinfection unit.

Multiple effluent limitation violations for E. coli throughout 2016. The facility uses peracetic acid for disinfection.

Requirement: Does the flow measuring device measure all flow received at the WWTP? For large wastewater facilities (average daily design capacity >50,000 gpd), is flow measured by an indicating, recording, and totalizing flow measuring device? [401 KAR 5:005 Section 12]

Compliance Status: C-No Violations observed

Comment: Hach SC200

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

Compliance Status: C-No Violations observed

Comment:

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

Compliance Status: C-No Violations observed

Comment:

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

Compliance Status: C-No Violations observed

Comment:

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

Compliance Status: C-No Violations observed

Comment: Drying Beds

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

Compliance Status: V-Out of Compliance-NOV

Comment: The facility has failed to comply with the effluent limitations contained in the permit.

Multiple effluent limitation violations for BOD, TSS, N, chlorine residual, and E. coli throughout 2016.

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

Compliance Status: C-No Violations observed

Comment:

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

Compliance Status: C-No Violations observed

Comment:

Requirement: Is the facility sampling in accordance with sampling requirements specified for biomonitoring in the KPDES permit conditions? [401 KAR 5:065 Section 2(1)]

Compliance Status: C-No Violations observed

Comment:

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

Compliance Status: C-No Violations observed

Comment:

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

Compliance Status: C-No Violations observed

Comment:

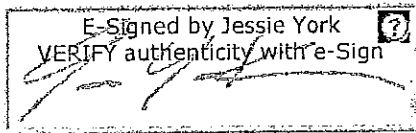
Requirement: Is the permittee in compliance with all permit conditions? [401 KAR 5:065 Section 2]

Compliance Status: V-Out of Compliance-NOV

Comment: The facility has failed to comply with the terms of the permit.

Documentation

- | | |
|--|--|
| <input type="checkbox"/> Photos taken | <input type="checkbox"/> Record of visual determination of opacity |
| <input type="checkbox"/> Documents obtained from facility | <input type="checkbox"/> Samples taken by DEP |
| <input type="checkbox"/> Samples taken by outside source | <input type="checkbox"/> Regional office instrument readings taken |
| <input type="checkbox"/> Request for Submission of Documents | <input type="checkbox"/> Other documentation |



Inspector:

Date: 1/19/17

Received By: _____ **Title:** _____ **Date:** _____

Delivery Method: Certified Mail

Certified Mail Number: 7014 0510 0002 3570 6023