



September 2, 2016

Director of the Division of Enforcement
Department for Environmental Protection
300 Fair Oaks Lane
Frankfort, KY 40601

Chief, Environmental Enforcement Section
Environmental and Natural Resources Division
U.S. Department of Justice
601 D street NW
Washington, DC 20005
DOJ Case No. 90-5-1-1-08591

Ms. Denisse Diaz, Chief
NPDES Permitting and Enforcement Branch
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Re: Consent Decree Case No. 2:05-cv-00199-WOB

To Whom It May Concern:

Pursuant to the above-referenced Consent Decree, Sanitation District No. 1 (SD1) was required to document its compliance with the Nine Minimum Controls (NMC), including proposed projects to be performed to ensure that compliance with the NMC is achieved by no later than twenty-four months after entry of the Consent Decree. SD1's NMC Compliance Report was submitted on March 12, 2008 to the EPA and Cabinet and received regulatory approval on July 6, 2008.

SD1 is required to submit an annual report on its implementation of the NMCs within sixty days after the anniversary date of the approved NMC Compliance Report. The enclosed report serves as the eighth annual report, covering calendar year 2015, which demonstrates SD1's continued commitment to the implementation of the NMCs.

A certification as required by the Consent Decree is also enclosed (Consent Decree paragraph 38).

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September 2, 2016

To the best of my knowledge and belief, the enclosed report is true, accurate, and complete, and further demonstrates SD1's commitment to the mission of protecting and enhancing the water resources and quality of life in Northern Kentucky.

If you have any questions or concerns, do not hesitate to contact me at 859-578-6762 or by e-mail at mwurschmidt@sd1.org.

Best regards,

A handwritten signature in black ink, appearing to read "Mark W. Wurschmidt". The signature is written in a cursive style with some loops and flourishes.

Mark W. Wurschmidt, P.E., BCEE
Interim Executive Director

MWW/wck
Enclosures

Sanitation District No. 1
September 2, 2016

Nine Minimum Controls 2016 Annual Compliance Report



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CERTIFICATION

Nine Minimum Controls 2016 Annual Compliance Report
Consent Decree Case No. 2:05-cv-00199-WOB

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, 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 and imprisonment for knowing violations.

Mark W. Wurschmidt
Mark W. Wurschmidt, P.E., BCEE
Interim Executive Director

9/2/16
Date

COMMONWEALTH OF KENTUCKY

COUNTY OF Kenton)ss.

The foregoing instrument was acknowledged before me this 2 day of September, 2016 by Mark W. Wurschmidt, Interim Executive Director of Sanitation District. No. 1.

Kathleen A. Jensch
NOTARY PUBLIC

Kenton County, Kentucky

My commission expires: 9-14-19

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NINE MINIMUM CONTROLS 2016 ANNUAL COMPLIANCE REPORT

September 2, 2016



Sanitation District No. 1
1045 Eaton Drive
Ft. Wright, KY 41017

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LIST OF ACRONYMS AND ABBREVIATIONS

CSAP	Continuous Sewer Assessment Program
CSO	Combined Sewer Overflow
CSS	Combined Sewer System
DWO	Dry Weather Combined Sewer Overflow
EPA	United States Environmental Protection Agency
GIS	Geographic Information Systems
LDSAP	Large Diameter Sewer Assessment
KDEP	Kentucky Department of Environmental Protection
KYTC	Kentucky Transportation Cabinet
MS4	Municipal Separate Storm Sewer System
MIC	Microbiologically Influenced Corrosion
NMC	Nine Minimum Controls
ORSANCO	Ohio River Valley Water Sanitation Commission
O&M	Operations and Maintenance
RWI	River Water Intrusion
SD1	Sanitation District No. 1
SIU	Significant Industrial User
S&F	Solids and Floatables

SECTION 1. INTRODUCTION

1.1 Overview

On April 18, 2007, Sanitation District No. 1 (SD1) entered into a Consent Decree with the U.S. Environmental Protection Agency and the Kentucky Energy and Environment Cabinet to address sanitary sewer overflows and combined sewer overflows (CSOs) in an effort to improve water quality throughout SD1's service area. As part of this agreement, SD1 was required to document its compliance with the Nine Minimum Controls (NMC) for CSOs as set forth in the CSO Control Policy, including proposed projects to be performed to ensure that compliance with the NMC is achieved by no later than twenty-four months after entry of the Consent Decree.

SD1's NMC Compliance Report was submitted on March 12, 2008 to the EPA and Cabinet and received regulatory approval on July 6, 2008.

1.2 Report Objective

Pursuant to the Consent Decree, SD1 is required to submit an annual report on its implementation of the NMCs within sixty days after each anniversary date of the approval of the NMC Compliance Report. The enclosed report serves as the eighth annual report to demonstrate SD1's continued implementation of the NMCs, from January 1, 2015 to December 31, 2015.

SECTION 2. NINE MINIMUM CONTROLS

The following sections present detailed descriptions of SD1's continued compliance efforts during 2015. These compliance efforts are in direct response to the Consent Decree requirements, to the guidance provided in the CSO Control Policy, and EPA's Guidance for Nine Minimum Controls.

2.1 NMC #1: Proper Operation and Regular Maintenance Programs for the Sewer System and CSO Outfalls

The purpose of this control is to establish operation, maintenance, and inspection procedures to ensure that the combined sewer system (CSS) and treatment facility will perform as effectively as possible to maximize treatment of combined sewage and reduce the magnitude, frequency, and duration of CSOs.

SD1 tracks its operation and maintenance (O&M) activities using the computerized maintenance management system Lucy. Appendix A provides an overview of the major activities performed in both the separate sewer system and CSS through implementation of regularly scheduled O&M activities, as well as SD1's formal Continuous Sewer Assessment Program (CSAP). The data represents approximate amounts of work completed by both internal and external crews and has been updated from previous years, based on SD1's continued improvements in Lucy recordkeeping.

2.1.1 Information Management Tools

In 2015, SD1 continued integrating information management tools to optimize the accessibility of data and the operational awareness of the organization. The following are brief descriptions of two programs that have improved SD1's data management capability.

GE Intelligent Platforms and XLReporter

In 2015, SD1 replaced its SCADA Lookout software, which was obsolete and no longer supported. The software was replaced with the redundant Proficy iFIX SCADA telemetry system by GE Intelligent Platforms, which has been implemented at all of SD1's treatment facilities, flood stations, and pump stations. The new system is integrated with the existing iFIX infrastructure at the treatment facilities and existing telemetry system infrastructure for the remote facilities. Information from Lookout was converted into iFIX and Proficy Historian was integrated to log data of interest, providing greatly expanded capabilities beyond what Lookout provided. Real-time data for all monitored facilities are now collected and archived in a central repository, and available for instant access through multiple interfaces.

Additionally, to provide greater flexibility in analysis of the archived SCADA data, XLReporter software by SyTech was implemented and integrated with Proficy Historian, which allows fast and reliable data access and summation. Several report templates have been created for the monitored facilities, with emphasis on the pump stations and flood stations. This software allows SD1 staff and consultants to generate reports at will for engineering evaluations, collection system model calibration, operation and maintenance reviews, flow monitoring, compliance reporting, and other uses. These reports will increase productivity, allow faster decisions, and improve responsiveness to operational issues.

Water Information Management Solutions (WIMS)

Another important advancement in data management that SD1 has implemented is the Water Information Management Solution (WIMS) by Hach Company. WIMS is an interface system that collects and seamlessly reports data from various inputs, such as, the real-time SCADA data stored in Proficy Historian, Laboratory Information Management Systems (LIMS), and doForms (SD1's preferred cloud-based mobile forms for field data collection).

WIMS provides plant managers and operators the ability to centralize multiple datasets and build custom dashboards to continuously monitor critical data. With this software, SD1 staff in Plant Operations now have a data hub where custom reports, charts, and graphs can continuously summarize trends and forecast plant performance. Approximately 40 employees are now using WIMS to make more intelligent process control decisions and evaluate permit compliance.

Additional integration between WIMS and SD1's wireless flow meters and rain gauges that are deployed throughout the collection system will be evaluated in 2016.

2.1.2 Asset Operation and Maintenance

Catch Basin Functionality Ratings

As described in the 2014 and 2015 Nine Minimum Controls Annual Report, SD1 began a supplementary rating system that indicates the above-the-grate functionality of catch basins and the effectiveness of the surface drainage. The program included inspection parameters, such as: road slope, slope from centerline to catch basin, curb heights, throat dimensions, positions of the catch basin relative to the gutter, road width, grating

size, debris accumulation in the street, and overall functionality rating scores. The data collected helped SD1 better inform municipalities of the effects of their resurfacing and street sweeping programs, which minimizes flooding problems and debris buildup. SD1 concluded its catch basin functionality assessments of the combined system in 2015, and provided results and recommendations to eight cities. More than 4,000 catch basin assessments were provided to the mayors, city administrators, and public works directors.

Catch Basin Inspection and Maintenance

SD1 continues to regularly conduct annual inspections of public CSS catch basins, to document maintenance and rehabilitation needs, in accordance with SD1's NMC program. SD1 also evaluates private and state-owned catch basins on an as-needed basis.

SD1-Owned Catch Basins

SD1 performed 2,044 inspections on public CSS drainage structures in 2015, and performed approximately 1,035 cleanings at approximately 1,021 locations. Respectively illustrated in Figures 2.1 and 2.2, on the two following pages, are the locations of the catch basin inspections and cleanings in 2015.

SD1 continually reviews its collected inspection data to adjust maintenance strategies and keep catch basins clean. In the past, SD1 has aimed to inspect all public CSS catch basins at least once per year. With the data collected over the past eight years, SD1 is now able to confidently target catch basins for inspections and cleanings where there are known recurring maintenance issues. Catch basins that are known to not experience recurring maintenance issues are now being inspected on a less frequent schedule. Catch basins are cleaned on an as-needed basis, as determined by the annual inspections. In addition to the as-needed cleanings, crews annually clean a set of approximately 400 catch basins that are assigned to specific preventive maintenance schedules that have proven to be effective. SD1 is currently evaluating how to incorporate its Lucity inspection and assessment records for catch basins into the CSAP for automatic forecasting of maintenance and repair schedules.

Private and State-Owned Catch Basins

SD1 conducted approximately 22 inspections of private and state-owned catch basins, in 2015.

Figure 2.1 Locations of CSS Catch Basin Inspections in 2015

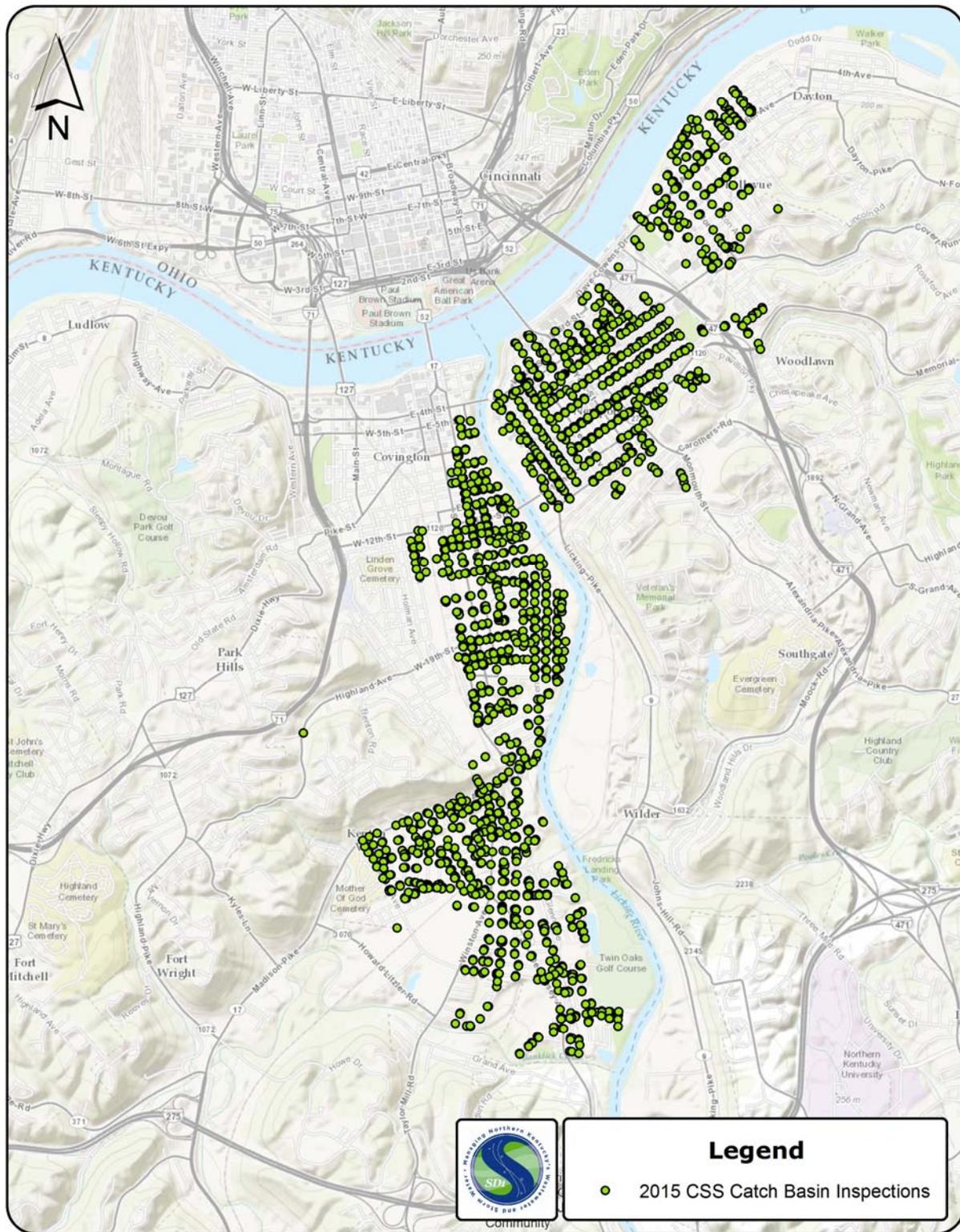
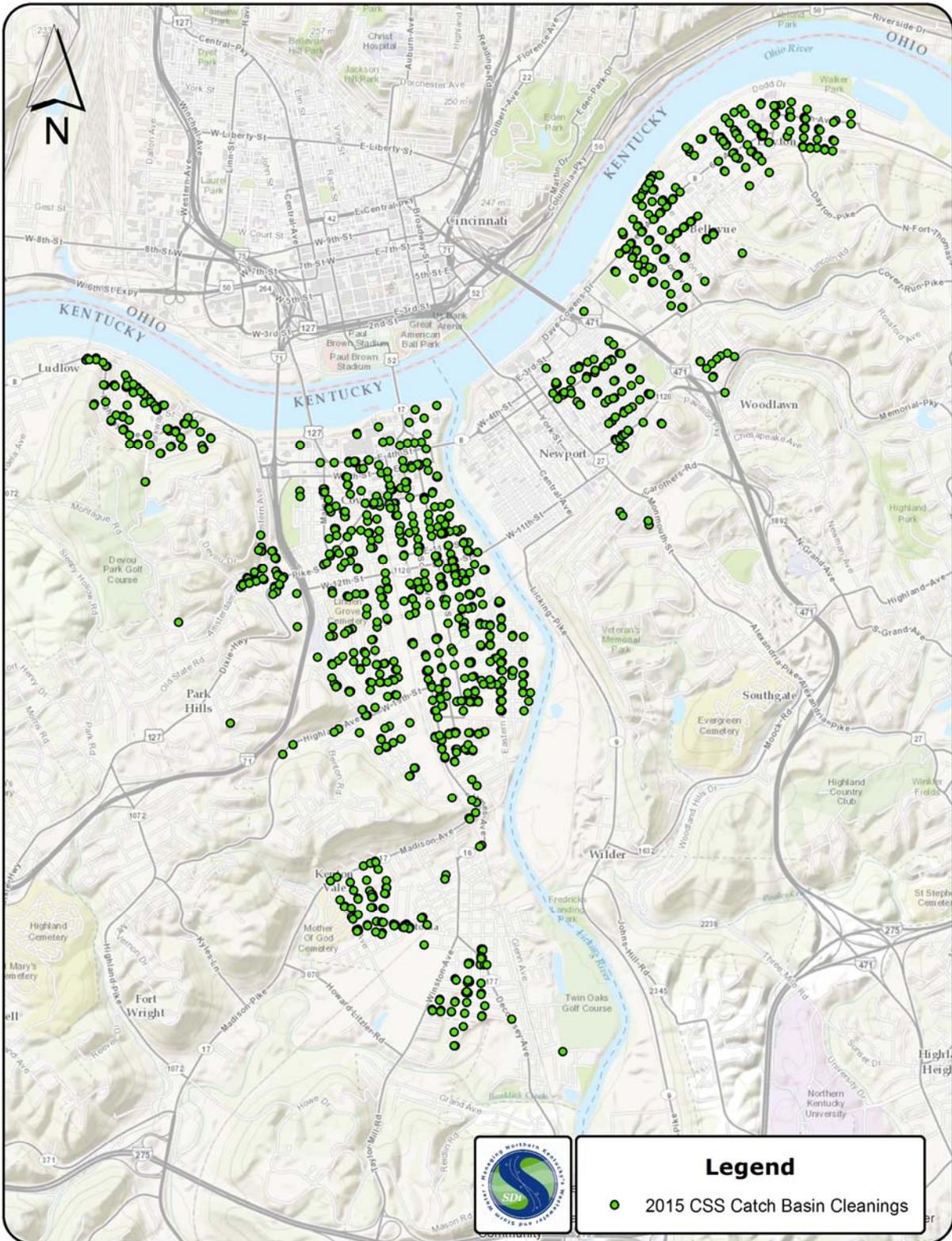


Figure 2.2 Locations of CSS Catch Basin Cleanings in 2015



Diversion and CSO Outfall Inspection and Maintenance

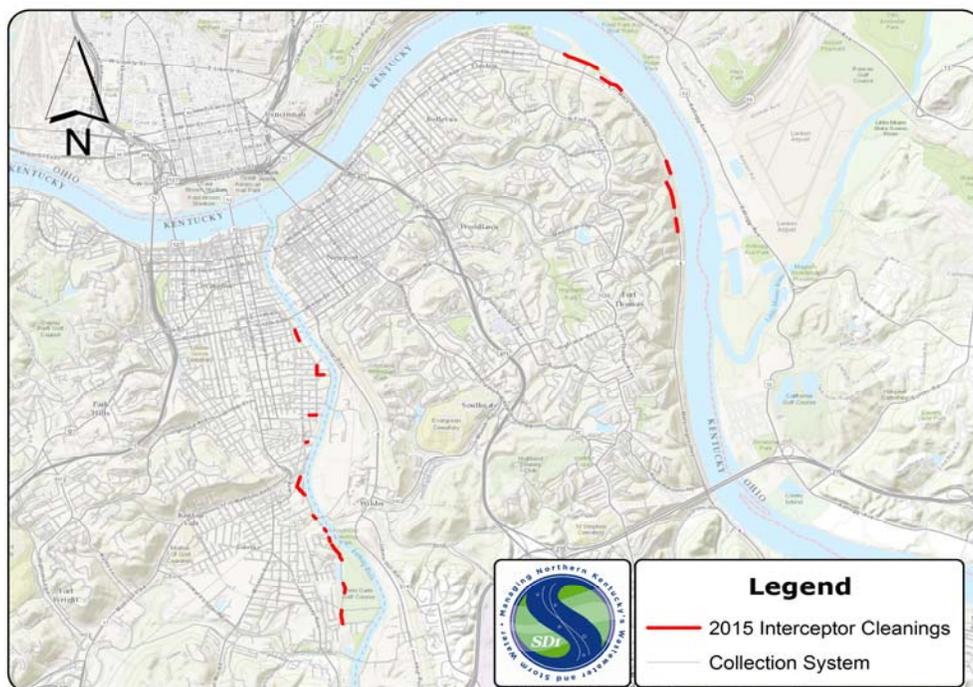
SD1 regularly inspects each diversion and the associated CSO outfall on a weekly or bi-weekly basis, as well as after every wet-weather event that exceeds half of an inch of rain. Cleanings are performed on an as-needed basis at the locations that have solids and floatables controls installed at the diversion manhole or the outfall (see NMC #6 for a list of SD1’s solids and floatables controls).

Throughout 2015, SD1 performed approximately 5,931 inspections at 133 CSO diversions. Approximately 10 percent of the inspections were performed during wet weather, 29 percent during dry weather, and 61 percent during the 48-hour period following a wet-weather or high-river event. The information gathered from these inspections is used to identify and respond to conditions that may lead to dry-weather overflows.

Interceptor Cleanings

SD1 cleaned approximately 37 large interceptor pipes along the Ohio River and Licking River in 2015. Rocks, debris, and grit were removed from more than 11,000 feet of interceptors. Figure 2.3 illustrates where the interceptors were cleaned in 2015.

Figure 2.3 Locations of Interceptor Cleanings in 2015



2.2 NMC #2: Maximum Use of Collection System for Storage

The purpose of this control is to maximize the use of the collection system by making relatively simple modifications to the CSS to enable the existing sewers to store wet weather flows until capacity is available in the downstream collection and treatment systems in order to reduce CSO volume.

2.2.1 River Water Intrusion Mitigation

River water intrusion (RWI) during wet-weather events has the potential to occupy in-line storage volume that would otherwise be available to combined sewers flows. Therefore, controlling river intrusion in the CSO outfalls increases the available storage volume and maximizes storage of wet-weather flows.

SD1's main approach to protecting against RWI consists of the installation of duckbill-shaped Tideflex check valves at 42 locations that impact 39 CSOs. SD1 has identified where regulating manholes' diversion inverts are at or below the river stage of 47 feet on the Ohio River, and have made those CSOs the priority for check valves. The Tideflex check valves can either be installed on the end of the existing outfall pipes, or in chambers constructed upstream of the existing outfall. See the 2015 NMC Annual Report for a map of the current Tideflex check valve locations. No new Tideflex check valves were installed in 2015, but a major repair has been completed. SD1 has budgeted in FY 2017 to design a set of RWI solutions for approximately seven CSO outfalls, and anticipates the next round of construction to begin in FY 2018.

McKinney Street CSO Tideflex Check Valve Repair

SD1 has completed a repair of a Tideflex check valve at the McKinney St CSO outfall in the City of Dayton, along the Ohio River. In conjunction with riverfront development in 2007, SD1 upsized this portion of the interceptor from its original 27-inch diameter to 83 and 110 inches, in order to maximize local in-line storage during wet weather. The failure of the Tideflex at the McKinney St CSO reduced the improved storage capacity in this interceptor during high river events, which made it a high priority for repair. The failure was due to the rotation of the rubber valve on the end of the 96-inch outfall pipe, which created an aperture from its resting weight on bottom of the headwall. Figure 2.4 illustrates the opened valve prior to the repair.

Figure 2.4 McKinney Tideflex Failure Prior to Repair

SD1 secured the Tideflex to the outfall pipe with steel bands, which stops the rotation, and built a steel frame above the valve to hoist it into a position that relieves the weight. The rubber Tideflex check valve has closed and remembered its original shape. The repaired McKinney CSO Tideflex now provides protection against the river and better in-line storage in the interceptor.

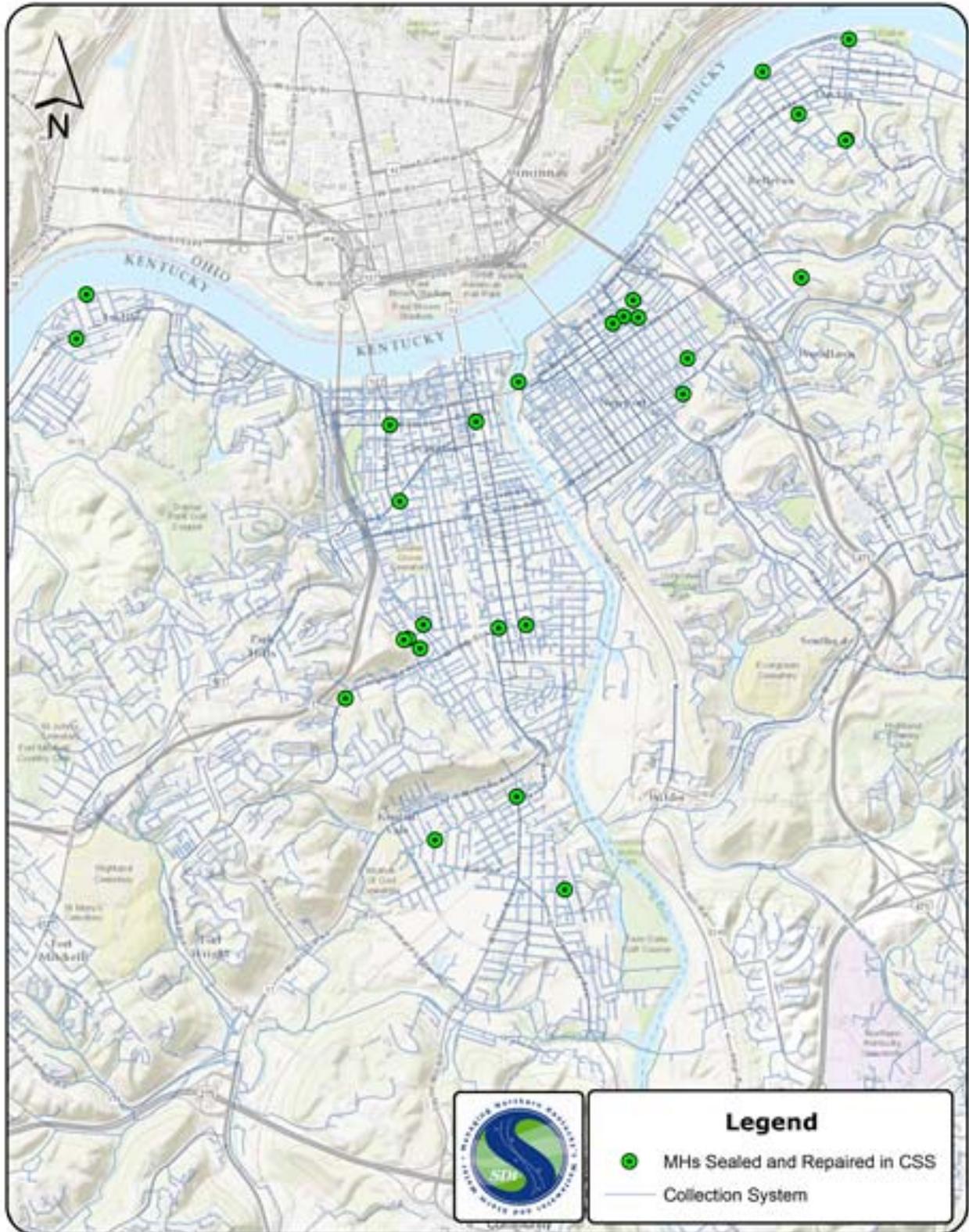
On the following page, Figure 2.5 illustrates the repair.

Figure 2.5 McKinney Tideflex after Repair

Repaired Manholes in the Combined Sewer System

In 2015, SD1 continued to repair and rehabilitate structures in the CSS to mitigate excessive inflow and infiltration. Approximately 28 low lying structures were sealed or fit with a new watertight frame and lid in the CSS. Figure 2.6 is a map of the approximately 28 manhole locations that were rehabilitated in the CSS in 2015.

Figure 2.6 Manholes Sealed or Repaired in the CSS in 2015



2.3 NMC #3: Review and Modification of Pretreatment Requirements

The purpose of this control is to minimize the impacts of discharges into the CSS from non-domestic sources during wet weather events, and to minimize CSO occurrences by modifying inspection, reporting and oversight procedures within the approved pretreatment program.

Standard Permits

SD1 permitted CR Brands as a new Significant Industrial User (SIU), during 2015. The CR Brands facility is located within the CSS, and their permit has a prohibition against discharging during wet weather. With this addition and three that were removed from the SIU program, SD1 had a total of 53 permitted Significant Industrial Users in its collection system as of December 31, 2015. Louis Trauth Dairy was removed from the SIU program in 2015, because the facility has been closed.

Wet Weather Permit Conditions

Three SIUs have special conditions in their permits, requiring zero discharges during wet weather, due to their locations within the CSS. SD1 conducts an annual surprise inspection during wet weather to ensure that the SIUs are in compliance with their permits. In 2015, no SIUs in the CSS were found to be discharging during wet weather.

The three SIUs in the CSS, during 2015, with special conditions in their permits are:

- CR Brands – Ludlow
- Imperial Sugar Company – Ludlow
- McGinnis Incorporated – Ludlow

Compliance Monitoring

In 2015, no special short term discharge permits were issued.

Enforcement

SD1 issued the following enforcement actions in 2015:

- 37 Notice of Violations, none in the CSS.
- \$10,250 in administrative fines issued with 10 of the Notice of Violations.

Pretreatment Modifications

No modifications were made to the pretreatment program in 2015.

2.4 NMC #4: Maximization of Flow to POTW for Treatment

The purpose of this control is to maximize flow to the treatment plant by making simple modifications to the CSS and treatment plant to enable as much wet-weather flow as possible to reach the treatment plant, thereby minimizing the magnitude, frequency, and duration of CSOs that flow untreated into receiving waters.

Wet Well Rehabilitation of Eighth Street and Patton Street Pump Stations

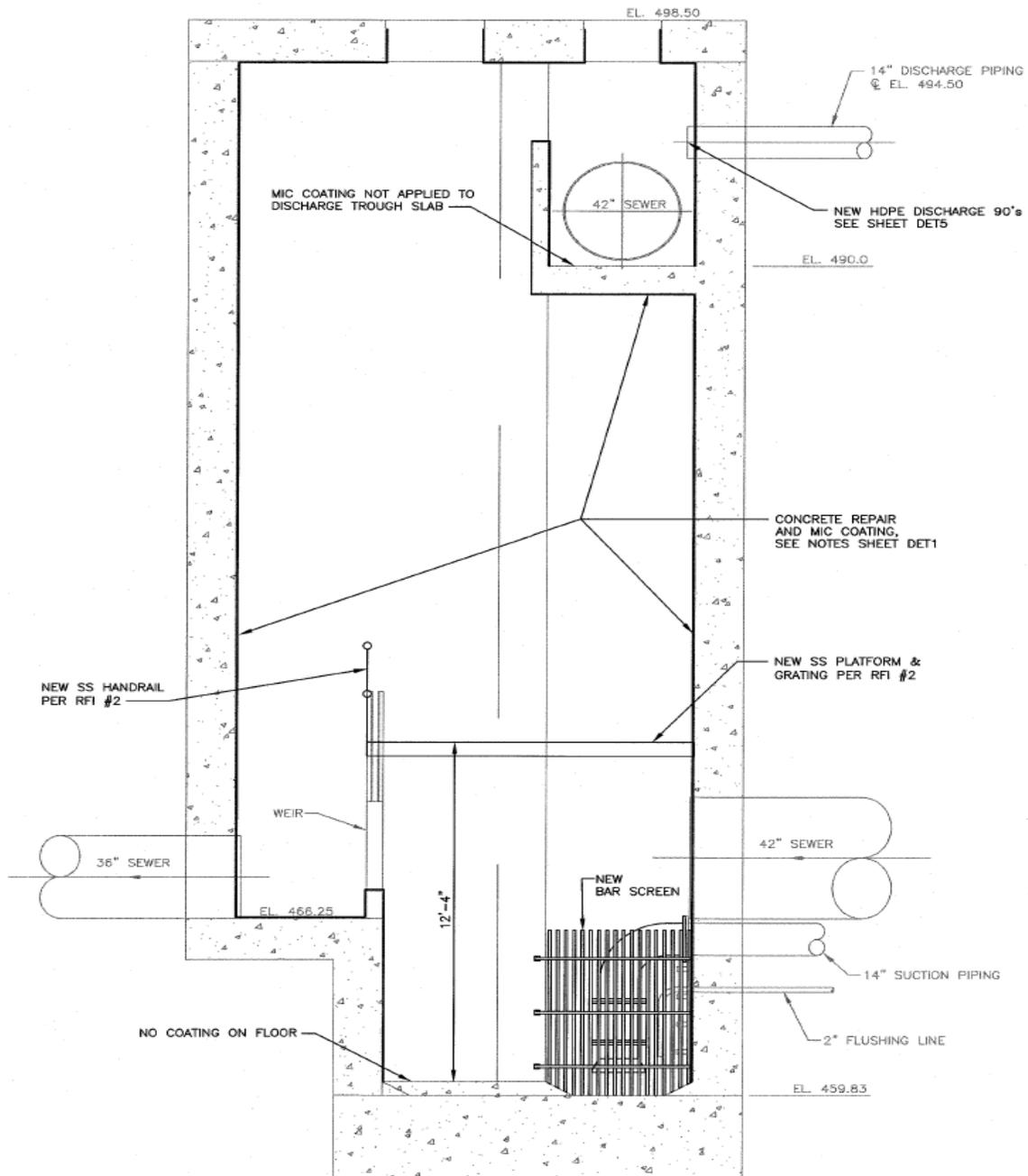
SD1 completed a rehabilitation of its Eighth Street and Patton Street Pump Station wet wells throughout 2015 and 2016. The concrete in both wet wells had begun to deteriorate. The wet wells were resurfaced with microbiologically influenced corrosion (MIC) coating material. Additionally, the volutes of the Eighth Street pump were replaced. Along with the rehabilitation of the wet well concrete and pumps, new bar racks were installed at each station to screen the incoming trash and protect the pump station assets. Figure 2.7 is photograph of the wet well flows entering the pump station, prior to the installation of the bar rack.

Figure 2.7 Eighth Street Pump Station Influent Prior to Modification



Figure 2.8 diagrams the repairs made to the Eighth Street Pump Station wet well and the new bar screen modification.

Figure 2.8 Eighth Street Pump Station Bar Screen Modification



The new bar racks at Eighth Street and Patton Street are on three month cleaning schedules. Each cleaning yields about 75 gallons of trash and grit.

Other pump stations in the CSS that have bar racks include: Second Street PS, Banklick PS, and Bromley PS. Between all five CSS pumps stations with screening facilities, approximately four to five dumpsters of grit and trash are removed from the collection system, monthly. Currently, the volume of grit and trash removal from the pump station screening facilities are not being tracked in the O&M totals provided in Appendix A.

2.5 NMC #5: Elimination of CSOs during Dry Weather

The purpose of this control is to ensure overflows do not occur in the CSS during dry-weather conditions by implementing measures that focus on proper and efficient collection system operation.

Investigations to Identify Potential Dry-Weather Overflow Locations

In conjunction with the routine CSO diversion inspections described in Section 2.1, inspectors visually look for debris and blockages that may trigger dry-weather overflows, or would affect the ability of the diversions to maximize the flows entering the interceptors during rainfall. Diversion structures that have dry-weather overflow records or have the potential to overflow during dry weather are evaluated in further detail to determine a recommended course of action, which may include more frequent monitoring. Diversions where multiple dry-weather overflows have occurred are further evaluated for additional actions which may include:

- Catch basin modifications to reduce solids that may cause dry-weather overflow risk at the downstream diversion
- Permanent modifications to the diversion, such as removing a weir plate, removing the bar rack over the diversion or upsizing the diversion pipe
- Targeted cleaning upstream or at diversions to address solids deposits
- More frequent inspections for diversions with a configuration considered susceptible to dry-weather overflow or for previously modified locations to confirm that the issue has been sufficiently addressed
- Permanent monitoring for early warning at locations where measures have failed to address the issue

- Installation of wireless flow meters or level sensors in the diversion's bypass pipe that provide email alarms to SD1 staff if a dry-weather CSO is occurring

Dry-Weather CSO Inspection Frequency

Historically, SD1's CSO investigation crews have inspected every CSO diversion once per week and after every rainfall event greater than half of an inch. The information gathered from these diversion inspections have been used to characterize the activity of CSOs during wet weather, and to identify locations susceptible to dry-weather overflows and the measures needed to eliminate them from reoccurring.

EPA's 1995 Guidance for Nine Minimum Controls for the fifth minimum control allows for historical trends and patterns to be analyzed to determine where inspection frequency adjustments are appropriate. According to the NMC Guidance, greater scrutiny should be given to areas of historical dry-weather overflows. Diversions that have never experienced a dry-weather overflow, are in good repair, and have no known hydraulic capacity issues, may be inspected less frequently.

SD1 modified to the dry-weather inspection routine of some CSO diversions in 2013. Based on historical inspections, modeled data, targeted CCTV inspections of upstream pipes, and EPA's 1995 Guidance for Nine Minimum Controls, SD1 determined that 37 diversions no longer need weekly dry-weather inspections. These 37 locations have shown no evidence of structural or maintenance issues, or lack of capacity that would lead to a dry-weather overflow. EPA's NMC guidance suggests that monthly inspections of such locations may be suitable, but SD1 is inspecting the 37 locations on a bi-weekly basis. The bi-weekly inspection frequency of the 37 diversions may be adjusted to a monthly schedule in the future, if the bi-weekly schedule results in no additional dry-weather CSOs. SD1 continues to perform weekly dry-weather inspections at the 96 diversions. No new adjustments to the CSO inspection routes were made in 2015.

Targeted Inspection Effort – LDSAP Diversion Sub-Program

SD1's Large Diameter Sewer Assessment Program (LDSAP) has a sub-program dedicated to pipe assessment and maintenance in the vicinity of CSO diversions. The Diversion Sub-Program began in early 2011 as a targeted inspection and cleaning strategy for pipes that are within a 1000-foot radius of all CSO diversions. The subprogram systematically and repeatedly assesses all lines upstream of the

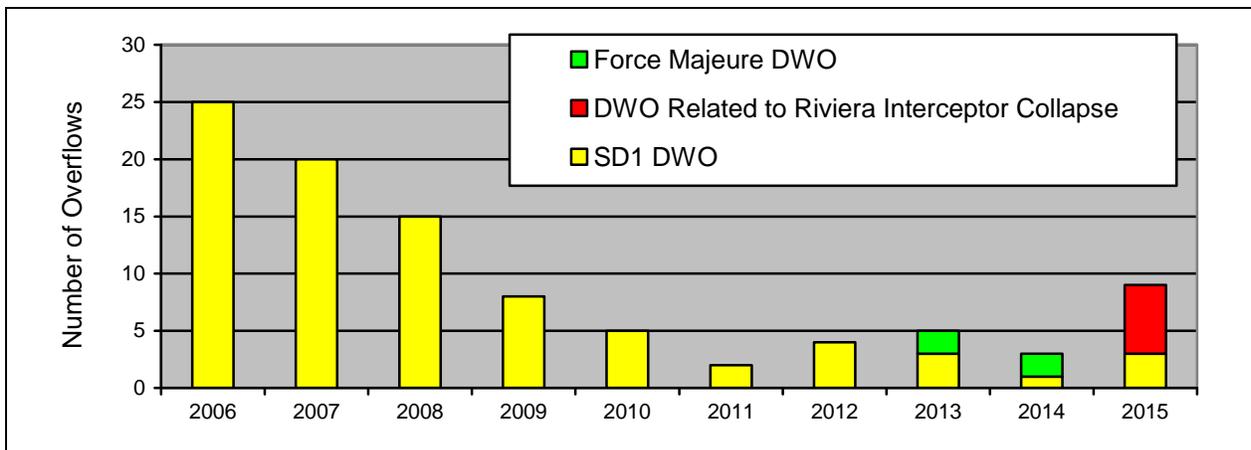
diversions, and produces appropriate next actions in the Continuous Sewer Assessment Program (CSAP). This level of proactive maintenance in the combined system has improved SD1’s ability to eliminate accumulating debris in critical areas and curtail dry-weather CSOs. In 2015, SD1 inspected approximately 5,040 feet of pipe in the LDSAP Diversion subprogram and cleaned approximately 830 feet. Pipes that are cleaned as a part of this subprogram are reassessed according to the CSAP logic to determine the effectiveness of the preventative maintenance and to evaluate potential sources of returning debris that may lead to dry-weather CSOs. Approximately 4,075 feet of pipe in the sub-program remain to be assessed. SD1 also has CSAP next actions scheduled for 24,500 feet of assessed pipe in this program through the end of Fiscal Year 2016.

The total footage of pipe inspected and cleaned, and the amount of debris and grit removed as part of the LDSAP Diversion Sub-Program, is included in the O&M data presented in Appendix A.

Annual Frequency of Dry-Weather CSOs

The frequency of dry-weather CSOs (DWOs) remains low, as summarized in Figure 2.9. Aside from the intermittent dry-weather overflow issues related to the reconstruction of a collapsed interceptor, SD1 only recorded three DWOs in 2015.

Figure 2.9 Occurrences of Dry Weather CSOs (2006 through 2015)



2015 Dry-Weather CSOs

SD1 recorded three DWOs during 2015 that were due to regular maintenance issues in the CSS. Additionally, SD1 recorded six separate DWOs at the Wildcat CSO (Structure ID# 0650098) along Taylor Creek in the City of Bellevue, which were all related to the bypass pumping operation during the reconstruction of the collapsed Riviera interceptor. All nine DWOs were documented in Quarterly Reports 30 through 33.

DWOs from the Riviera Interceptor and Wildcat CSO

During the construction of the Riviera Interceptor, SD1 made several improvements to the temporary bypass pumping operation, and implemented real-time monitoring technology to minimize the impact of DWOs when they occurred. The monitoring technology also helped avoid some DWOs by sending early-warning alarms to staff and contractors when the interceptor flows began to approach the CSO bypass pipe. This provided SD1 with the capability to respond to bypass pump maintenance issues and reduce the environmental impacts of DWOs on Taylor Creek. SD1 anticipates Force Majeure consideration of the Wildcat DWOs.

Figure 2.10 is a picture of the wireless ultra-sonic level sensor SD1 installed above the Wildcat CSO bypass pipe to continuously monitor for the DWOs during construction.

Figure 2.10 Real-Time Level Sensor Monitoring for DWOs at the Wildcat CSO



DWOs due to Regular Maintenance Issues

A summary of the three DWOs unrelated to the Riviera interceptor construction project, and the actions taken to prevent the overflows from reoccurring are provided in Table 2.1.

Table 2.1 Summary of Dry Weather CSOs that Occurred in 2015

Structure ID#	Location	Date	Overflow Cause	Estimated Volume	Corrective Action Taken
1720109 KY0021466 Outfall 75	Ludlow, KY Lagoon Street	04/29/15	Blockage of concrete	6,000 gallons	SD1 set up bypass pumping and excavated the line between the diversion manhole and the interceptor where the blockage of concrete was found. The concrete was removed and a point repair was made on the pipe. It was determined that a failed retaining wall along the river had collapsed the pipe. SD1 restored the retaining wall and river boat anchor system that were disturbed during the repair of the pipe and used the appropriate backfill to prevent future subsidence of the restored retaining wall.
1710116 KY0021466 Outfall 68	Ludlow, KY Adela Street	07/29/15	Blockage of debris	10,000 gallons	The blockage of debris in the diversion structure and the line between the diversion and interceptor was probed and jetted for two hours before the blockage broke. The Adela CSO remains on the weekly inspection schedule and the diversion was vactored twice in 2015 for preventative maintenance. SD1 is currently evaluating if a permanent monitoring device is appropriate for the Adela CSO.

Structure ID#	Location	Date	Overflow Cause	Estimated Volume	Corrective Action Taken
0610072 KY0021466 Outfall 20	Bellevue, KY Washington Ave	10/21/15	Blockage of grease	7,000 gallons	Grease was jetted out of the mainline between the diversion and the interceptor. The line was then televised to identify the source of the blockage. A rootball was discovered near a buried manhole, downstream of the diversion. The rootball was sawed out and jetted, and the discovered buried manhole was raised. Additionally, 183 FOG letters were mailed to residents and businesses upstream of the DWO. A sample of the standard FOG letter can be found in the CMOM FY2015 Annual Report.

DWO Force Majeure Findings for 2013 and 2014

In a letter dated November 24, 2014, from the Kentucky Department for Environmental Protection (KDEP) and the United States Environmental Protection Agency (EPA), it was determined that two of the three recorded dry-weather CSOs in 2014 were probable Force Majeure events, pursuant to Paragraph 61 of the Consent Decree. Additionally, two dry-weather CSOs from 2013 were determined to be probable Force Majeure events. The letter documenting the Force Majeure findings can be found in Appendix B.

2.6 NMC #6: Control of Solid and Floatable Materials in CSOs

The purpose of this control is to reduce the amount of solid and floatable (S&F) material discharged to water bodies through wet-weather CSOs through the implementation of simple measures such as: baffles, screens, catch basin modifications, and nets.

Catch Basin Modifications

In 2015, SD1 continued replacing catch basins and retrofitting catch basins with bells and grated inlets to reduce the amount of S&F materials entering the CSS. The following factors are considered when determining if a bell installation is appropriate:

- The catch basin is in need of structural repair and does not have a bell
- The catch basin is in need of total rehabilitation and can be replaced with a new catch basin that has both a grated inlet and a bell
- An untrapped catch basin directly upstream of a dry-weather CSO that appears to be a potential source of debris will be retrofitted with a bell
- Odor control of gases escaping the main line through an untrapped catch basin

In 2015, SD1 repaired 65 catch basins and replaced 18 catch basins in the CSS. The newly replaced catch basins were equipped with new bells. Additionally, 4 existing catch basins were fitted with new bells to alleviate odor issues. Of the currently known 5,870 public, private, and state-owned catch basins and inlets in the CSS, there are approximately 2,711 structures that are known to be equipped with a trap or bell for solids and floatables control.

In-line and End-of-Pipe Controls

The program consists of approximately 40 controls, including:

- 17 static weirs
- 12 outfall nets
- 4 baffles
- 4 baffle chambers
- 1 bar rack
- 1 combination weir and baffle
- 1 combination weir and screen

During 2015, no new in-line or end-of-pipe solids and floatables control projects were installed. Regular maintenance of the existing controls, such as baffle chamber cleanings and net replacements, were performed on an as-needed basis, in response to the regular CSO diversion inspections outlined in Section 2.1. SD1's solids and floatables controls program is summarized in Table 2.2 on the following two pages.

Table 2.2 Current Solids and Floatables Control Program

CSO/Diversion	Name	Type of Control	Status
0030031	Carmel Manor	Netbag	Installed
0050190	Highland Heights PS bypass	Netbag	Installed
0200069	617 Mary Ingles	Netbag	Installed
0330100	Tower Hill	Netbag	Installed
0340050	Lester Ln	Netbag	Installed
0340051	Manor Ln	Netbag	Installed
0360079	Anchor Inn	Netbag	Installed
0570011	McKinney St	Engineered S&F Control Baffle Chamber w/Bar Rack Above Baffle	Installed
0570030	Main St	Engineered S&F Control Baffle Chamber w/Bar Rack Above Baffle	Installed
0600096	O'Fallon Ave	Netbag	Installed
0600104	Van Voast Ave	Static weir	Installed
0650041	Geiger Ave	Type "B" Bar Rack	Installed
0650098	Wildcat Run	Netbag	Installed
0650084	Taylor Bottoms	Baffle	Installed
0690059	Enterprise Ave	Static weir	Installed
0730129	12 th St	Static weir	Installed
0770006	Saratoga St	Static weir	Installed
0790086	4 th St	Static weir	Installed
0840111	9 th St	Static weir	Installed
0840112	10 th St	Static weir	Installed
0840116	12 th St	Static weir	Installed
0910005	Oakland Ave	Static weir	Installed
0910065	James Ave	Static weir	Installed
0910068	Oakland Ave	Static weir	Installed
0910084	Meiken/Eastern	Netbag	Installed
0930026	17 th St	Baffle	Installed
0930050	19 th St	Baffle	Installed

CSO/Diversion	Name	Type of Control	Status
0930066	19 th St	Weir and baffle	Installed
0930106	16 th St	Static weir	Installed
0960064	15 th St	Netbag	Installed
1420043	10 th St	Baffle	Installed
1440121	Greenup St	Engineered S&F Control Nutrient Separating Baffle Box (solids sump, screen and baffle)	Installed
1440156	Garrard St	Engineered S&F Control Baffle Chamber (solids sump, screen and baffle)	Installed
1440207	Kennedy St	Netbag	Installed
1480116	Willow Run	Static weir	Installed
1480129	Willow Run	Static weir	Installed
1490132	Highway Ave	Static weir	Installed
1490172	Swain Ct	Netbag	Installed
1510133	Marcella Dr	Static weir	Installed
1710003	Adela St	Weir and baffle	Postponed
1850158	Church St	Weir and screen	Installed
1880090	Virginia Ave	Static weir	Installed

2.7 NMC #7: Pollution Prevention

The purpose of this control is to minimize various forms of pollution from entering into the CSS, and compromising the water quality of the receiving water body and/or SD1's

conveyance and treatment infrastructure. As the Northern Kentucky regional storm water agency, many components of SD1's approach to pollution prevention is implemented as required by EPA National Pollutant Discharge Elimination System Phase II Municipal Separate Storm Sewer System (MS4) regulations and reported in SD1's storm water annual reports. In that regard, SD1 uses a wide-ranging approach to pollution prevention from public education and programmatic initiatives to physical efforts such as catch basin cleaning and facility audits.

SD1 collected approximately 450 cubic yards of debris from catch basin cleaning activities in 2015 and approximately 212 cubic yards of grit and debris from grit pits. In addition, street sweeping operations occur on a regular basis in 21 communities throughout SD1's service area, and vary in frequency from annually to weekly.

The following sections describe some of the other major activities that demonstrate SD1's continued commitment to this minimum control.

2.7.1 Pollution Prevention Audits of SD1 Facilities

In November of 2015, SD1 once again performed pollution prevention audits on all of its facilities, as a requirement of the Kentucky Pollutant Discharge Elimination System (KPDES) Phase II Storm Water Permit. Facilities audited by SD1 staff include: SD1 Main Office, Employee Development Center, Dry Creek Wastewater Treatment Plant, Eastern Regional Water Reclamation Facility, Western Regional Water Reclamation Facility, and more than 130 pump stations.

2.7.2 Public Education Programs

Public Service Park

Dedicated to those who enhance Northern Kentucky's quality of life through public service, Public Service Park is an example of SD1's leadership in water pollution prevention practices, also known as best management practices. The park is an aggressive approach to empower and educate the public on the vital importance of protecting the waterways for future generations. Featuring storm water best management practices, a wide range of green infrastructure, and cutting edge public educational programming, SD1's Public Service Park targets many audiences, ranging

from the development community and water professionals, to students and the general public who can follow a self-guided tour.

SD1 conducted 12 Public Service Park tours, for 159 participants in 2015. These tours included participants from Northern Kentucky University, Gorman Farms, Kentucky Society of Professional Engineers, the Water Environment Federation and local adult chaperone trainings for school field trips.

In addition to the adult tours, SD1 conducted 8 field trips for local elementary schools at SD1's Public Service Park. These field trips are an optional extension of SD1's elementary storm water and watershed curriculum that is taught in over 50 Northern Kentucky schools. In 2015, 437 students attended a field trip at Public Service Park. Groups attending field trips included students from public, private and independent schools as well as home school groups and scout troops.

Classroom Presentations

SD1 is committed to empowering students to protect the environment and has reached many students with interactive school presentations. SD1 uses an interactive model called Enviroscope to teach the negative impact of polluted storm water runoff on local waterways. During 2015, 50 Enviroscope lessons were taught in 18 schools, which reached more than 1,000 students.

Public Presentations

In 2015, SD1 also participated in 34 education events and reached approximately 2,150 students and adults, beyond the formal programs covered above.

Printed Publications

What's Happening! Publication

SD1 published three articles in the "What's Happening!" publication, in 2015. The articles, "Tips for buying and applying de-icer", "Helpful tips for homeowners" and "Protect the environment, drain your pool properly", provided tips and best practices for preventing pollution in our local waterways. These articles can be found in Appendix C. The articles published in "What's Happening!" were distributed to residents in SD1's services area. Copies were also placed at the front counter in SD1's main office.

Bill Insert

In March of 2015, SD1 mailed approximately 125,000 copies of the catch basin bill insert to customers. SD1 also provided 2,000 copies to its co-permittees to share with residents. This bill insert encouraged residents to "spring clean" their storm drains. The insert explained that pollutants and debris washed into catch basins by rain usually go directly to nearby waterways and, in turn, can degrade the quality of water we rely on for drinking water and recreation. The bill insert provides tips, including using fertilizers and pesticides sparingly, not dumping oil, chemical or yard debris down storm drains, and not littering. The bill insert can also be found in Appendix C.

Radio Broadcast

SD1 made a guest appearance on the *55 KRC Car Show with Dale Donovan* in the fall of 2015. During the show, SD1 employees discussed different ways to reduce pollution in local waterways as it relates to car care. There were approximately 20,500 listeners.

2.7.3 Land Disturbance/Sediment and Erosion Control

SD1's Storm Water Rules and Regulations established a land disturbance permit process, which is applicable for any land disturbance activity greater than or equal to one acre that occurs in the separate system, or an area of 10,000 square feet or more in the combined system. All construction activities within SD1's service area that disturb one acre of land or more in the separate system, or an area of 10,000 square feet or more in the combined system, are required to receive a permit from SD1 prior to the commencement of the activity. SD1's plan review process includes examination of storm water runoff from construction sites and post-construction storm water management for new developments and re-developments. Appropriate sediment and erosion control best management practices must be properly cited to control erosion from the site before plans are approved.

Post-construction storm water runoff treatment controls are required in the separate storm sewer system, as well as the combined sewer system to reduce the pollution associated with the storm water runoff. Property owners are required to enter into a long term maintenance agreement for post-construction water quality and volume reduction controls.

During 2015, SD1 issued 68 Land Disturbance Permits, 35 Grading Permits, and 8 Clearing Permits. SD1 also conducted approximately 2,850 inspections of 163 construction sites.

2.7.4 Sponsored Events

SD1 continues its partnership with the Northern Kentucky Household Hazardous Waste Action Coalition. This unique coalition is comprised of local governments and organizations and is sponsored by area businesses. SD1 serves as the chair of the coalition, which meets quarterly.

As a way to inform the public about the proper disposal methods of household hazardous waste, SD1 worked with the Household Hazardous Waste Action Coalition to form and, more importantly, promote the website www.nkyhhw.org. The website provides viewers with disposal and recycling methods for household items, especially those considered hazardous waste. By informing people how to properly dispose of the hazardous waste, SD1 is actively influencing the community to reduce the amount of contaminants that enter the CSS.

Household Hazardous Waste Collection Event

A household hazardous waste collection event for the residents of Boone, Campbell and Kenton counties was held October 17, 2015. This event was promoted through various media outlets including: websites, flyers, an advertisement placed in the community newspapers, a column in the quarterly community publication "What's Happening!", and a press release distributed to local TV news stations. More than 2,100 citizens participated in the event. Participants dropped off items such as: antifreeze, oil, lead acid batteries, paint, solvents, pesticides, electronics, fluorescent light bulbs, propane tanks, paper, and aerosol cans.

River Sweep Event

SD1 once again sponsored Ohio River Valley Water Sanitation Commission's (ORSANCO) annual River Sweep event, which took place on June 20, 2015. More than 17,000 volunteers from public organizations, civic groups, recreational clubs and the general public in six states bordering the Ohio River came together to collect more than 500 tons of trash and other debris from the banks of the Ohio River and its tributaries.

2.8 NMC #8: Public Notification

The purpose of this control is to reduce exposure to potential health risks caused by CSOs by informing the public of the location of CSOs, the actual occurrences of CSOs, the possible health and environmental effects of CSOs, and the recreational or commercial activities curtailed as a result of CSOs.

SD1 maintains warning signage posted near CSO outfalls and public education signs located near public access to water to warn about unsafe conditions during and after rainfall events.

Wet Weather Advisory Emails

SD1 continues to issue email wet-weather advisories to alert those who requested to be on the distribution list that weather conditions could potentially cause a CSO. There are approximately 230 email accounts on the distribution list, which includes members of the general public, Northern Kentucky community leaders, local Water Districts, and SD1's Watershed Community Council members. Individuals can sign up to receive this e-mail notification by filling out a request form on SD1's website or by e-mailing a request to info@sd1.org. During 2015, email notifications were sent to this group at least 25 times. SD1's website also includes other overflow related information. Electronic communications with the public on wet-weather advisories will evolve as SD1 initiates its social media program, in the coming year.

Recreational Management Tool

SD1's recreational management application Recr8OhioRiver was developed with Greater Cincinnati Metropolitan Sewer District and the ORSANCO. Version 2.9 was made available in 2015 with multiple enhancements and improvements. This Recr8OhioRiver website and smart phone application have been made available to inform the public about water quality around Greater Cincinnati and Northern Kentucky. Recr8OhioRiver provides predicted bacteria counts (*E.coli*) on sections of the Ohio River, based upon historical monitoring and modeling that has been conducted by the three agencies. Giving the public access to this information in real-time, especially during and following extreme weather allows them to make more informed decisions on whether or not to recreate on the Ohio River. To date, the free Recre8OhioRiver application has been downloaded on 4,160 Apple devices and 1,956 Android devices.

2.9 NMC #9: Monitoring to Characterize CSO Impacts

The purpose of this control is to determine the occurrence and apparent impacts of CSOs through visual inspections and other simple methods, to gain an understanding on overflow occurrences and water quality problems that reflect use impairments caused by CSOs. Changes in such occurrences can provide a preliminary indication of the effectiveness of the NMC.

2.9.1 Hydraulic Modeling: Inspections and Flow Monitoring

In 2008, SD1 completed the development of a highly calibrated system-wide hydraulic model for its collection system to be used as an accurate planning tool for capital improvements, and to provide information about the current performance of SD1's system. To ensure that the model continues to provide the most accurate information about the systems' performance, SD1's wet-weather CSO and SSO investigation crews continue to perform routine inspections during and after rain events. Additionally more than 60 flow meters and 20 rain gauges are continuously deployed to monitor flows and calibrate the model.

Inspections

As described previously, SD1's CSO investigation crew regularly inspects each CSO outfall and its associated diversions once per week or bi-weekly, as well as after wet-weather events that produce at least one half of an inch of rain. The solids & floatables controls associated with CSO diversions and outfalls are inspected routinely, as a part of the regular CSO inspections. The solids and floatable controls are cleaned on an as-needed basis. These inspections and cleanings ensure proper operation and maintenance of the diversions, as described in Section 2.1, but are also evaluated to support characterization and verification of the collection system models. Information gathered from diversion inspections is collected and stored in Lucity, which is then used to characterize the activity of CSOs during wet weather and to identify the location of dry-weather overflows and the measures needed to eliminate them from reoccurring.

These efforts are part of SD1's on-going process of verifying the model results against actual field conditions through monitoring and observation. Over time, these field verifications will continue to improve the collection systems model to better reflect

observed conditions. The ongoing recalibration of SD1’s collection systems model is critical to accurately quantify CSO impacts with future water quality modeling.

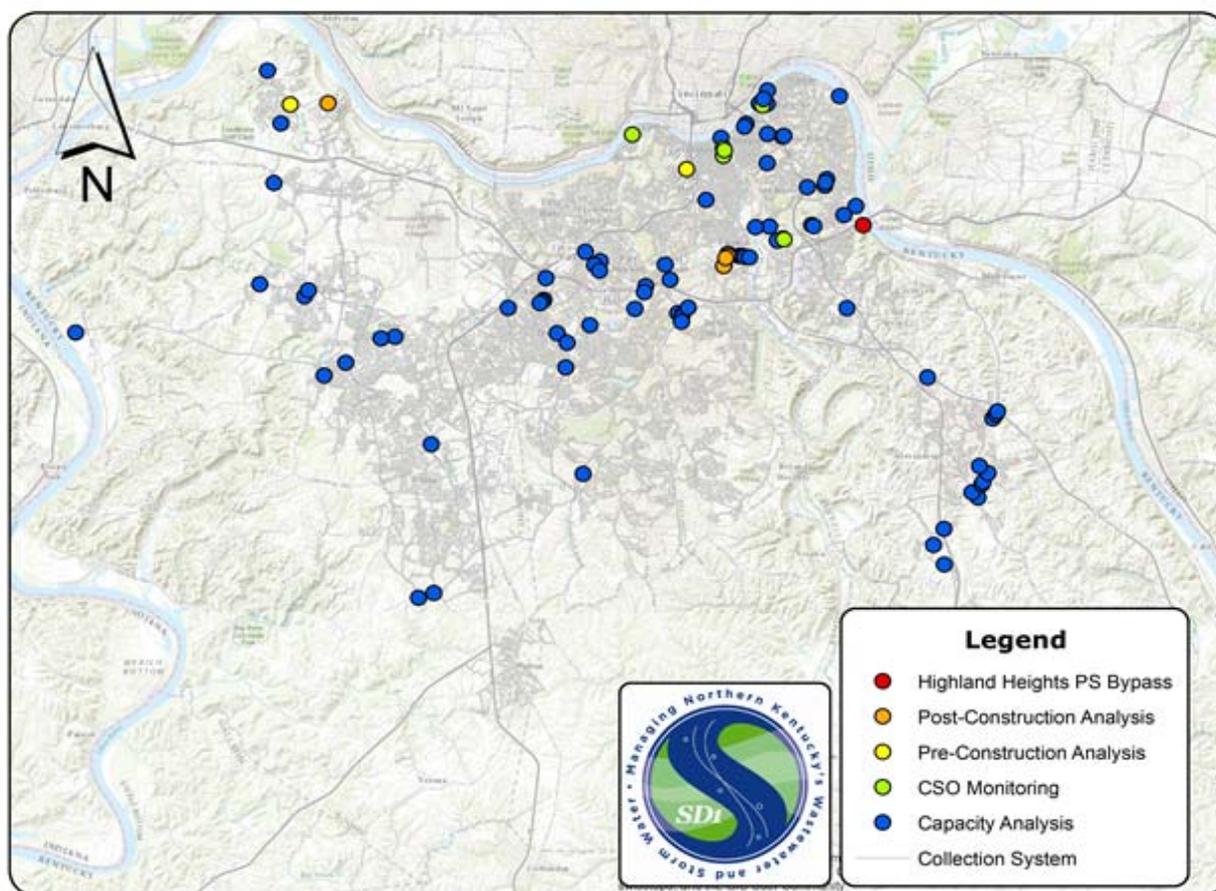
Flow Monitoring

SD1’s flow monitoring crews are involved in a number of monitoring efforts to collect data in specific areas of the collection system to confirm model predictions, to identify and confirm areas that are suspected to have high inflow and infiltration (I/I), and to confirm the effectiveness of capital improvements.

During 2015, SD1 maintained approximately 105 flow monitoring locations throughout the collection system.

Figure 2.11 illustrates SD1’s flow monitoring locations in 2015.

Figure 2.11 SD1 Flow Monitoring Locations in 2015



2.9.2 Water Quality Monitoring

The purpose of SD1's Watershed Monitoring Program is to establish a baseline assessment of watershed and stream conditions, via the collection of instream water quality, biological, physical habitat and hydromodification data throughout Northern Kentucky. This program includes dry-weather base flow water quality and biological monitoring in all watersheds (approximately 75 locations), as well as, event-based wet-weather water quality in major watersheds (approximately 60 locations). Additionally, both wet and dry weather water quality samples are collected on the Ohio River between river miles 444 and 518 (22 locations).

Performance Monitoring

The instream water quality data and collected overflow data are used to help characterize watersheds in Northern Kentucky. These datasets play an integral role in prioritizing, designing, and implementing cost-effective solutions that will reduce overflow occurrences and improve water quality in rivers and creeks within SD1's service area. These data were used to create the hydraulic and water quality models that served as primary planning tools in developing SD1's Watershed Plans that were submitted on June 30, 2009, as well as the March 14, 2014 final submission. In 2012, SD1 initiated Phase II of its monitoring efforts, which entailed revisiting sites originally sampled at the onset of the program in 2007.

During 2015, there were 14 sites sampled within the West Basin. These site revisits included biological and habitat assessments, base flow water quality samples, and where appropriate, hydromodification surveys. Additionally, two base flow and one wet-weather event were sampled for the entire Northern Kentucky portion of the Ohio River (river miles 444-518). SD1 also continued to develop and refine performance metrics, in order to measure its progress in improving water quality in relation to the base-line water quality models.

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APPENDIX A:
O&M and Repair Work (2008 through 2015)

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O&M and Repair Work (2008 through 2015)									
Activity	2008	2009	2010	2011	2012	2013	2014	2015	Total
Combined System Structures									
Catch Basins Cleanings	1,211	888	787	1,392	1,431	1,393	544	1,408	9,054
Catch Basin Cleaning (Yards of Debris Removed)	N/A	427	469	525	466	630	312	450	3,279
Catch Basin Inspections	2,057	3,328	4,070	4,125	3,750	4,072	2,971	2,066	26,439
New Catch Basin Installation	0	5	2	2	0	5	1	0	15
Catch Basins Replaced	159	224	140	90	61	59	28	18	779
Catch Basins Repaired	128	65	78	211	38	59	45	65	689
Grit Pit Cleaning (Yards of Debris Removed)	358	439	355	365	415	408	360	213	2,913
Manholes									
Manhole Inspections	5,985	4,688	1,254	1,841	814	1,258	524	0	16,364
Manholes Repaired	485	332	320	656	407	314	200	241	2,955
Manholes Replaced	55	59	96	30	38	33	12	20	343
New Manholes Installed	26	53	39	50	49	35	33	16	301
Sewer Cleaning									
Sewer Lines Cleaned – Feet (Length of Pipe)	706,441	530,303	451,877	375,303	462,281	613,968	683,140	409,167	4,232,480
Sewer Inspection									
Sewer Line Initial Inspection - Feet	1,126,198	855,962	463,299	504,488	623,277	721,736	761,720	1,394,999	6,451,679
Sewer Line Follow-up Inspection – Feet	288,605	555,856	631,781	473,996	581,711	801,503	673,824	544,188	4,551,464
Sewer Lines Inspected - Total Feet	1,414,803	1,411,818	1,095,080	978,484	1,204,988	1,523,239	1,435,544	1,939,187	11,003,143
Sewer Line Rehab/Replacement Stats									
Sewer Lines Rehabilitated (CIPP) - Feet	953	2,251	29,528	84,717	51,100	59,137	32,782	27,786	288,254
Sewer Lines Repaired/Replaced - Feet	18,442	17,658	27,157	11,392	31,391	12,680	8,323	6,347	133,390
Misc. Sewer Line Repairs - Count	45	40	8	9	15	0	0	0	117

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APPENDIX B:

KDEP/EPA Letter Dated November 24, 2014

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STEVEN L. BESHEAR
GOVERNOR

LEONARD K. PETERS
SECRETARY

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION
DIVISION OF ENFORCEMENT
300 FAIR OAKS LANE
FRANKFORT KENTUCKY 40601
www.kentucky.gov

November 24, 2014



CERTIFIED MAIL 7012 2920 0001 0746 6290
RETURNED RECEIPT REQUESTED

David Rager
Executive Director
Sanitation District No. 1 of Northern Kentucky
1045 Eaton Drive
Ft. Wright, Kentucky 41017

Re: KDEP/EPA Demand for Stipulated Penalties
Consent Decree Number: 2:05-CV-199-WOB

Dear Mr. Rager:

The Kentucky Department for Environmental Protection (KDEP) and the United States Environmental Protection Agency (EPA), Region 4 upon review of Quarterly Reports submitted by Sanitation District No. 1 (SD1) for reporting periods from July 1, 2010 to June 30, 2014, has determined that fifteen (15) Dry Weather Overflows (DWOs) have occurred from SD1's combined sewer system during these reporting periods. Of the 15 DWOs, four were considered probable Force Majeure events pursuant to Paragraph 61 of the Consent Decree.

A total of eleven (11) DWOs reported in Quarterly Reports from July 1, 2010 to June 30, 2014, are considered for Stipulated Penalties, including:

1. Quarterly Report No.12 (July – September 2010), 1 DWO
McKinney CSO Diversion Structure; ID# 0570011; date of occurrence, July 1, 2010; estimated volume, 5,100 gallons.
2. Quarterly Report No. 13 (October –December 2010), 2 DWOs
McKinney Street CSO Diversion Structure; ID# 0570011; date of occurrence, November 1, 2010; estimated volume, 213,250 gallons.
Adela Street CSO Diversion Structure; ID# 171003; date of occurrence, December 31, 2010; estimated volume, 5,700 gallons.

3. Quarterly Report No. 16 (July – September 2011), 1 DWO
Patton Street CSO Diversion Structure; ID# 0930105; date of occurrence, July 14, 2011;
estimated volume, 1,790,000 gallons.
4. Quarterly Report No. 18 (October – December 2011), 2 DWOs
East 38th Street CSO Diversion Structure; ID# 0870021; date of occurrence, February 6,
2011, estimated volume, 2,200 gallons.
Lester Lane CSO Diversion Structure; ID# 0340034; date of occurrence, February 6, 2011,
estimated volume, 96,150 gallons.
5. Quarterly Report No. 19 (April – June 2012); 1 DWO
Kennedy Street CSO Diversion Structure; ID# 0870021; date of occurrence, February 6,
2011; estimated volume, 400 gallons.
6. Quarterly Report No. 21 (October – December 2012); 1 DWO
Carneal Street CSO Diversion Structure; ID# 1710084; date of occurrence, December 17,
2012; estimated volume, 2,100 gallons.
7. Quarterly Report No. 22 (January – March 2013); 1 DWO
O’Fallon Avenue CSO Diversion Structure; ID# 0600041; date of occurrence, January 10,
2013; estimated volume, 1,200 gallons.
8. Quarterly Report No. 24 (July – September 2013); 2 DWOs
Rohman Street CSO Diversion Structure; ID# 0730008; date of occurrence, August 3,
2013; estimated volume, 1,525 gallons.
Glenn Street CSO Diversion Structure; ID# 0870052; date of occurrence, August 18, 2013;
estimated volume, 425 gallons.

Pursuant to Section X, Paragraph 54(a) of the Consent Decree, KDEP and EPA may assess a stipulated penalty of \$2,000.00 for each DWO occurring after April 18, 2009. Stipulated penalties of \$30,000.00 can thus be assessed for the 15 DWO that have occurred from July 1, 2010 to June 30, 2014. However, KDEP and EPA have taken into account the documents presented by SD1 that details the circumstances concerning the reported DWOs and, as a result, have decided to exercise enforcement discretion to not demand the full amount of stipulated penalties that could be assessed. Therefore, after review of the submitted documentation, KDEP and EPA hereby demand stipulated penalties pursuant to Section X, Paragraph 54(a) of \$22,000.00.

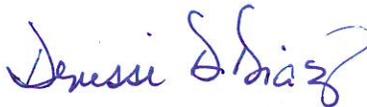
In accordance with Section X, Paragraph 55 of the Consent Decree, SD1 shall pay within thirty (30) days of receipt of this demand notice \$11,000.00 (50%) of the stipulated penalties to the Commonwealth of Kentucky and \$11,000.00 (50%) of the stipulated penalties to the United States for a total of \$22,000.00. Instructions for penalty payments to the Commonwealth of Kentucky can be found on Section XI, Paragraph 57 of the Consent Decree. Electronic funds transfer wiring instructions for the payment to the United States are enclosed.

If there are any questions, you may contact Mr. Maurice Horsey, Chief of the Municipal and Industrial Enforcement Section, EPA Region 4 at (404) 562-9764 or Mr. Jeff Cummins, Director, Division of Enforcement, KDEP at (502) 564-2150.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey Cummins", with a long, sweeping flourish extending to the right.

Jeffrey Cummins, Director
Division of Enforcement
KY Department for Environmental Protection

A handwritten signature in blue ink, appearing to read "Denisse Diaz", with a stylized, cursive script.

Denisse Diaz, Chief
NPDES Permitting and Enforcement Branch
Water Protection Division

Enclosure

ENCLOSURE

Re: Wiring Instructions for Payment of Stipulated Penalties to the United States

For payment amounts less than \$50,000 the Department of Justice recommends Pay.Gov. The brochure with the instructions for Pay.Gov is attached to this email. The file number that should be referenced is 2007A17812. If you have any questions you may contact Ms. Lynne Woodrum of the Financial Litigation Unit of the US Attorneys Office as provided below. Online payment instructions are attached for Pay.Gov.

Lynne Woodrum
Paralegal Specialist
Financial Litigation Unit
United States Attorney's Office
Eastern District of Kentucky
859-685-4864

**Pay.Gov ACH Authorization Request
(Mail this portion)**

Name: _____
 Social Security Number (Last 4 #'s required): _____
 DOJ CDCS Number: _____
 Email Address (if you'd like a confirmation email): _____

I authorize my bank to automatically deduct my federal debt payment for \$ _____, I authorize them to deduct this amount: _____ weekly _____ bi-weekly _____ monthly on the _____ day of each month from my checking or savings account. I agree that I may be charged a Returned Item Fee if the funds are not available at the time of the scheduled Payment Due Date. By submitting this form, I agree to the terms and conditions stated on it, and that the information provided is true and correct.

I understand that I must make regular monthly payments until I am notified that my authorization form has been approved. If at any time I decide to discontinue Pay.Gov ACH, I will provide at least 30 days written notice, faxed to the NCIF at 202-532-4383, or mailed to the address below.

Account Type:

_____ Personal Checking _____ Personal Savings
 _____ Business Checking _____ Business Savings

Bank Name: _____

Account Holder's Name: _____

Bank Routing # (first 9 digits on bottom of your check): _____

Checking/Savings Account #: _____

Account Holder's Signature: _____

Date Signed: _____

Return this form and voided check or savings account deposit slip to:

**U. S. Department of Justice
 Nationwide Central Intake Facility
 Attn: Pay.Gov Processing
 P. O. Box 56720
 Washington, DC 20035
 Fax: 202-532-4383**

Don't Have Internet?

We can help!

We can set you up for recurring payments. Please fill out the Pay.Gov ACH Authorization Request form on the left.

If you have any questions about accessing Pay.gov, please, contact your local collection office.

*Pay your debt online.
 Read this brochure to find out how.*



U. S. Department of Justice
 Nationwide Central Intake Facility
 P. O. Box 56720
 Washington, DC 20035

On-line Payment services using Pay.Gov

Phone: 800-683-6567
 Fax: 202-532-4383
 E-mail: NCIF@usdoj.gov



What is Pay.Gov?

Pay.gov is a secure Government website that allows you to submit payments for your federal debt(s) electronically. Pay.gov is managed by the Department of Treasury, Financial Management Service.

Benefits?

No more paper. No mail delay. Submit your payments on-line. Make a payment anytime and anywhere with Internet access. The Pay.gov site is available 24 hours a day, 7 days a week (holidays included) for users to submit payments.

Ways to Pay your debt?

- **Credit Card.** pay one payment at a time. We accept Visa, Master Card, Discover, American Express, Diner's Club and payments using a debit card.
- **Checking or Savings account:** pay either one payment at a time or register online to schedule recurring payments (see instructions to the right), or
- Request that we set up and schedule your recurring payments by filling out the authorization request form in this brochure.

How Does it Work?

Credit Card Payments: Pay.gov provides real-time authorization for all credit card payments. However, payments will generally be processed the next business day. Credit card limit is \$99,999.99.

Bank Debit Transactions:

Debit payments are processed the next business day; as long as the transaction is entered before 8:00 p.m. Eastern Standard Time. Transactions entered after 8:00 p.m. Eastern Standard Time may take two business days to process. Processing follows the Federal Reserve holiday schedule. See that schedule at:

<http://www.federalreserve.gov/aboutthefed/k8.htm>

How Do I pay ON-LINE?

Step 1: Obtain your DOJ CDCS number from your statement or contact your collection office. This number will begin with a year, a letter (normally A) and then 5 more numbers, i.e., 2009A000000.

Step 2: Log on to the Internet and type <https://www.pay.gov> into your browser's location bar, and hit "enter" to access the Pay.gov web page.

Step 3: From the home page, go to **Search Public Forms** and enter form name of

DOJ DAOG/CDCS

or click on the Department of Justice under Frequently Used Forms on the left side of the screen.

Step 4: Use your DOJ CDCS number and payment information to complete the form. Click submit and then the web-site will walk you through all the screens to do your final submission.

How to set up Recurring Payments?

If you would like to set up recurring payments through Pay.Gov, please do the following:

1. Go to <http://www.pay.gov>
2. In the middle of the page you should see:
 - Should I register?
 - Will you use Pay.Gov often?
 - Do you want to save your Profile?
 - Do you track your payments or set up recurring payments?

[Click Here to Register](#)

3. Click on the "Click here to Register" link and go through a self-enrollment process.
4. Once you are registered, go back to the Pay.Gov website and log in.
5. You need to go to the "DOJ DAOG/CDCS" form and fill out the first page just like you were making a non-recurring payment and put in the recurring payment amount and click to "Submit the form button."
6. The next screen is where you enter your bank information and select how much you want to pay, how often (weekly, bi-weekly, monthly, quarterly), and date when you want the recurring payments to come out of your bank account. You must enter the number of payments you want to make. For example, if you enter 10 payments, Pay.Gov will automatically take the next 10 payments and then stop taking payments after the 10th payment.

APPENDIX C:

Example of 2015 Public Education Publications

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Tips for buying and applying de-icer

Snow and ice removal is an annual winter chore. As snow piles up, the first line of defense is simply to shovel paved areas to keep them clean and prevent ice from forming. When ice does form, it is common to use salt and other types of chemical de-icers to clear walkways and driveways.

Salt and other chemical de-icers help make travel conditions less hazardous, but they can have an impact on local waterways, landscaping, pets and wildlife. Below is a list of tips to help you buy and safely apply de-icers this winter without harming the environment.

Tips for buying:

Traditional rock salt and some chemical de-icers can injure a pet's paws, damage cars, prematurely



age cement and asphalt and pollute streams. There are some alternative de-icers that have less of an impact but are just as effective at melting ice from paved walkways and driveways.

- Look for alternative de-icers like calcium chloride and calcium magnesium acetate.
- Try using de-icers that contain alternative ingredients, such as beet juice.

- Avoid using de-icers that contain urea.

Tips for applying:

- Before applying de-icer, make sure to manually remove as much snow and ice as possible. De-icer works best when it is applied to thin layers of ice.
- Follow the directions on the de-icer container. Using more than what is recommended will not make the ice melt faster. When snow and ice melt, the runoff picks up the excess de-icer and carries it to our streams.
- When possible, avoid using salt and other de-icers near trees, shrubs and grasses. The salty water can severely harm or kill a home's landscaping.

If you have questions, email info@sd1.org or call the Storm Water Hotline at 859/578-6745.

SD1 meetings go online

Sanitation District No. 1 strives to be customer-centered and community-focused as we provide wastewater and storm water services. With this in mind, we're making monthly board meetings more accessible to you through online video streaming. Visit SD1.org for a link to live and archived recordings of SD1 board

Helpful tips for homeowners

As you create resolutions for the new year, keep these tips and other resources below in mind to help protect you, your home and our community.

FACT: Antibiotics, steroids and other pharmaceuticals are contaminating our waterways because the wastewater treatment process is not designed to remove these substances.

TIP: Never flush or wash medications down a drain or toilet in your home. Dispose of expired or unused medications in the trash or take them to a pharmaceutical drop-off location near you. A list of locations can be found on our website at www.sd1.org/prescription.

FACT: Common household chemicals like cleaners, auto fluids, paint and lawn care products are toxic to a wastewater treatment plant.

TIP: Wastewater treatment plants are living units designed to treat wastewater, not hazardous chemicals. If flushed or poured down the drain, these chemicals can kill the tiny living organisms that treat the wastewater at SD1's treatment plants. Contact your Boone County Solid Waste Coordinator or visit www.nkyhhw.org to learn how to dispose of chemicals and other hazardous materials.

FACT: FOG (fats, oils and grease) can clog pipes and cause raw sewage to back up in your home or overflow out of SD1's system.

TIP: Household grease from meat fats, lard, baking goods, butter and margarine, cooking oils, food scraps, sauces and dairy products can build up in pipes, preventing your wastewater from making its way through the

sewer pipes to SD1's treatment plant. Instead of pouring these substances down the drain, collect fats, oils and grease in a container and throw them in the trash can.

FACT: When flushed down the toilet, diapers, baby wipes and other personal hygiene products can cause blockages in pipes that lead to backups and overflows of sewage.

TIP: Diapers, wipes, cotton balls, dental floss and other personal hy-

giene products can build up in pipes, bind with any fats, oils or grease that have accumulated in the pipes and cause major blockages. They also can find their way into the environment if the blockages cause SD1's system to overflow. Always dispose of these items in the trash.

If you have questions, email info@sd1.org or visit www.sd1.org for more information.

SD1



1045 Eaton Drive
Fort Wright, KY 41017
phone: 859/578-7450

Hours of Operation:
Monday-Friday, 8 am - 4:30 pm

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Don't 'leave' yard debris lying around

Autumn is near and with it brings warm, sunny days, cool, crisp nights and colorful leaves falling to the ground. You probably think the leaves spread across your landscape paint a beautiful picture; however, leaves left on lawns and streets can cause drains to clog and potentially flood your property or surrounding properties in your community.

As a homeowner, it is your responsibility to maintain your lawn and help protect property in your community. Follow the simple tips below to help protect your community this fall:

- Rake or sweep leaves and yard debris out of your street and away from storm drains to prevent clogged drains and flooding.
- Rake leaves into a compost pile to make a nutrient-rich fertilizer to use on your garden next spring.
- Create mulch for your lawn by pulverizing leaves with your lawn mower. Leaves are one of the best fertilizers for your lawn.
- Contact your city to learn about possible leaf pick-up services it may offer. Remember, if you are asked to put the leaves near the street, wait to do so until just before the collection day.
- Never rake your leaves or yard debris into storm drains, ditches, creeks or rivers.



Protect the environment, drain your pool properly

If not properly handled, swimming pool water can harm our streams. The chemicals used in pool maintenance (chlorine, bromine, copper and silver) are designed to sterilize pools but can wreak havoc in the natural environment, killing fish, insects and plants in our waterways. For this reason, it's important to properly drain your pool water when closing your summer oasis for the approaching cold weather.

The best place to discharge pool water is to the sanitary sewer system, but sometimes this option is not available or is not allowed. In that case, your next best choices are to discharge pool water onto the lawn of your property or to the storm water system. Either way, it's important before discharging the water that it is clear, dechlorinated and of a neutral pH.

When discharging pool water onto your lawn, the water should not flow

off your property and you should not allow it to pond for a prolonged period of time. Stagnant water can create odors and serve as breeding ground for flies and mosquitos. Discharge pool water slowly (25 gallons per minute or less) to prevent soil erosion, flooding or damage to adjacent properties.

Do not discharge water containing cleaning chemicals, acid buffering compounds, algae and other substances into the street, storm water system or a stream. Be sure to test your pool water for chemicals and other pollutants before discharging.

When is it safe to discharge pool water?

- Pool water should be essentially free of chlorine (less than 0.1 parts per million total chlorine), algacides and other potential pollutants prior to discharge. To reduce chlorine lev-

els you can use chlorine neutralizer, which can be purchased at many pool supply stores.

- A 10-day holding time after the last chemical treatment is adequate to dissipate chlorine prior to discharging the pool water.
- pH levels should be within a normal range (6 to 9). pH adjustment chemicals, instructions and test kits are available at many pool supply stores.

Planning on having plenty more pool days this year? Keep in mind the backwash water from pool filters also contains chemicals, debris and dirt that can damage the environment, so do not drain it directly into the storm water system.

If you have any questions regarding proper pool discharging procedures, please contact SD1 at 859/578-7450.

SAVE the date!

Household waste collection event

Saturday, October 17

Residents of Boone, Campbell and Kenton counties may drop off select household hazardous waste items on Saturday, October 17 at UC Health Stadium, "Home of the Florence Freedom." Visit www.nkyhhw.org for updates on this event as they become available!

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SD1

Managing Northern Kentucky's
Wastewater and Storm Water



Spring clean storm drains

The catch basins, or storm drains, on the side of the road funnel rainwater to Northern Kentucky's creeks and rivers. With spring showers on the horizon, it is important to remember that pollutants and debris washed into these basins when it rains are not usually carried to one of SD1's treatment plants for cleaning, but instead are conveyed to a nearby waterway.

Once in our creeks and rivers, chemicals, yard debris, litter and dirt can degrade the quality of the water we rely on for drinking water and recreation. Basins and drains clogged by debris also can lead to storm water flooding that creates safety hazards and costly property damage.

You can help protect public health, property and the environment by following the tips on the back of this insert.



Remember these tips to help protect public health, property and the environment:

- ▶ Sweep grass clippings, leaves and other debris off the street and away from storm drains. Dispose of all waste properly in trash receptacles or recycling bins.
- ▶ Use fertilizers and pesticides sparingly on your yard and landscaping.
- ▶ Never dump, pour or wash oil, chemicals, paint, yard debris, trash or other substances down a storm drain.
- ▶ Rake leaves and other debris from your yard and place them in plastic bags or trash bins for disposal.
- ▶ During the winter months or in the event of a late snowfall, try to shovel ice and snow away from storm drains to maintain a clear opening.



For more helpful tips and information about how to prepare for heavy precipitation, visit www.sd1.org/CustomerService/RainEventPreparations.