

The logo for SD1, consisting of the letters 'SD1' in a bold, blue, sans-serif font.

Managing Northern Kentucky's
Wastewater and Storm Water



December 17, 2010

Acting 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

Chief, Water Program Enforcement Branch
Water Management Division
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

Dear Gentlemen:

Pursuant to the above-referenced Consent Decree, Sanitation District No. 1 (SD1) is required to submit annual reports on the implementation of its Capacity, Management, Operations, and Maintenance (CMOM) programs. These reports are due no later than December 31 each year.

The Consent Decree was entered on April 18, 2007 and required SD1 to submit four separate CMOM documents within the first year – the Grease Control Program, the Sewer Overflow Response Plan (SORP), the CMOM Self-assessment, and the Pump Station Operation Plan for Backup Power. Each of these submittals has received regulatory approval. Updates to these programs are now included in the CMOM Annual Report, as it is not required for the program updates to be submitted as separate documents.

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

Page 2
December 17, 2010

I am confident in the integrity of the enclosed document, and I am certain that its content not only satisfies regulatory requirements, but also helps further the mission and vision of SD1 by establishing aggressive, proactive, achievable measures to protect water resources and enhance the quality of life in Northern Kentucky.

If you have any questions or concerns, do not hesitate to contact me at 859-578-7465 or by email at jeger@sd1.org.

Best regards,



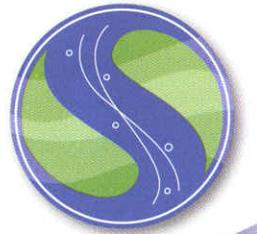
Jeffery A. Eger
General Manager

JAE/jh
Enclosures

Sanitation District No. 1
December 17, 2010

Capacity, Management, Operations, & Maintenance (CMOM) FY 2010 Annual Report





CERTIFICATION

Capacity, Management, Operations, & Maintenance (CMOM)
FY 2010 Annual 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.



Jeffery A. Eger
General Manager

12/9/2010

Date

COMMONWEALTH OF KENTUCKY

COUNTY OF Kenton

)ss.

The foregoing instrument was acknowledged before me this 9th day of December, 2010 by Jeffery A. Eger, General Manager of Sanitation District No. 1.



NOTARY PUBLIC

Kenton County, Kentucky

My commission expires: 7/6/2014

CAPACITY, MANAGEMENT, OPERATIONS, AND MAINTENANCE FY 2010 ANNUAL REPORT

December 17, 2010



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

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LIST OF ACRONYMS AND ABBREVIATIONS

Cabinet	Kentucky Energy and Environment Cabinet
CCTV	Closed Circuit Television
CIP	Capital Improvement Program
CMOM	Capacity, Management, Operations, and Maintenance
CSAP	Continuous Sewer Assessment Program
CSO	Combined Sewer Overflow
ERP	Emergency Response Plan
FOG	Fats, Oils, and Grease
FSE	Food Service Establishments
FY	Fiscal Year
gbaMS	GBA Master Series (information tracking system)
GCE	Grease Control Equipment
I/I	Inflow and Infiltration
IMS	Information Management System
O&M	Operations & Maintenance
PM	Preventive Maintenance
SCI	Stream Condition Index
SD1	Sanitation District No. 1
SORP	Sewer Overflow Response Plan
SSES	Sanitary Sewer Evaluation Survey
SSO	Sanitary Sewer Overflow

SECTION 1. INTRODUCTION

1.1 Overview and Report Period

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 (Cabinet) to address sanitary sewer overflows (SSOs) and combined sewer overflows (CSOs) in an effort to improve water quality throughout SD1's service area. A significant component of the Consent Decree that aids in achieving these goals is the implementation of formal Capacity, Management, Operations, and Maintenance (CMOM) programs. SD1's CMOM programs are designed to manage the collection systems' assets and operations in a manner that maximizes efficiency and reduces the potential for overflow occurrences. Proper planning and management of CMOM programs can result in a reduction of the number, frequency, and volume of SSOs and CSOs.

Pursuant to the Consent Decree, SD1 is required to submit annual reports on its implementation of the CMOM programs. This report describes implementation of SD1's CMOM programs during Fiscal Year (FY) 2010, which began on July 1, 2009 and ended on June 30, 2010.

1.2 Collection System Major Components

SD1's sewer system covers approximately 200 square miles and serves approximately 101,000 customer accounts. SD1's collection and treatment systems are comprised of approximately:

- 39,902 manholes
- 4,108 catch basins in the combined sewer system
- 1,600 approximate miles of sewer lines
- 225 approximate miles of storm water lines
- 143 pump stations (11 of which are owned by the City of Walton and operated by SD1 through a contract; 2 of which are owned by the Airport and operated by SD1 through a contract)
- 15 flood pump stations
- 8 small wastewater treatment plants (4 of which are owned by separate entities and operated under contract by SD1)
- 2 regional water reclamation facilities

SD1's sewer system conveys wastewater from private laterals connected to homes, businesses, and industries through a series of gravity lines, pumped systems, and interceptors to a wastewater treatment plant. The service area consists of both combined and separate systems. The combined sewers are located primarily in the river cities. A map of the service area and major components can be found in Appendix A.

1.3 CMOM Program Structure

SD1 has been performing informal CMOM activities for several years; however, these activities were structured into formal CMOM programs during the self-assessment in 2007. During the self-assessment process, a written purpose, goals, and recommended improvements were established for each program. SD1 currently has 34 CMOM programs, which are identified in Table 1.1.

Table 1.1 CMOM Program Activities

Management Programs	Operations Programs
• Organizational Structure	• Emergency Preparedness & Response
• Communication & Customer Service	• Safety
• Legal Authority	• Budgeting
• Acquisition Considerations	• Engineering
• Information Management System (IMS)	• Call Before You Dig
• Training	• Water Quality Monitoring
• System Mapping	• Compliance
• SSO Reporting & Notification	• Mobile Waste Haulers
Maintenance Programs	• Pump Station Operations
• Manhole Repairs	• Pump Station Emergencies
• Rehabilitation & Replacement	• Pump Station Force Mains PM
• Mainline Sewer Repairs	• Odor & Corrosion Control
• Sewer Cleaning	• Continuous Sewer Assessment
• Equipment & Tools Maintenance	• Smoke & Dye Testing
• Pump Station Maintenance	• Flow Monitoring
• Maintenance of Rights-of-way	• CCTV Inspection
Capacity Programs	• Manhole Inspections
• Capacity Assessment & Assurance	
• New Connection Tap-In	

SECTION 2. CMOM PROGRAM HIGHLIGHTS

2.1 Budgeting

The purpose of SD1's Budgeting Program is to provide structured processes that enable all operating departments to execute SD1's mission and vision in a fiscally responsible manner and provide cost-effective services to ratepayers. The Budgeting Program provides SD1 with a clear understanding of the organization's financial needs and obligations, which results in the ability to adequately manage debt service and plan for future needs. This program also helps SD1 personnel categorize expenses and properly manage assets and infrastructure.

2.1.1 Capital and Operations & Maintenance Expenditures

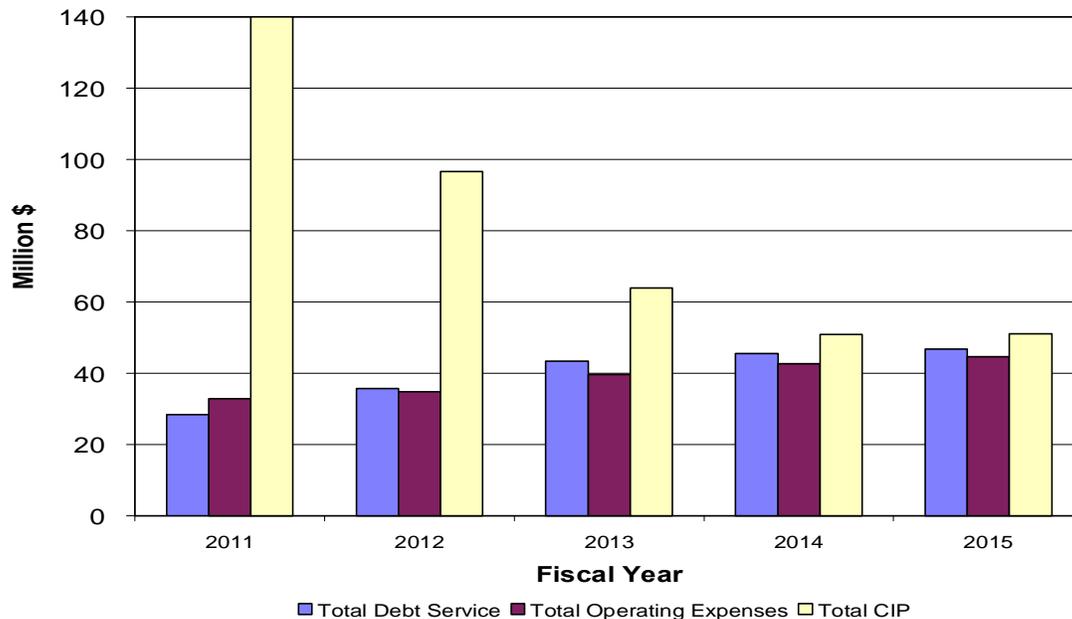
The un-audited capital expenditures for FY 2010 totaled approximately \$154.5 million, and the un-audited operations and maintenance (O&M) expenditures for FY 2010 totaled approximately \$28.1 million. As required in the Consent Decree, SD1 has developed Watershed Plans for improvement projects to be implemented over the next several years, which will greatly increase capital spending. The total capital spending associated with all project work over the next five years is approximately \$402.3 Million, as demonstrated in Table 2.1. Figure 2.1 represents SD1's anticipated debt service, O&M, and capital improvement program (CIP) expenses over the next five years.

Table 2.1 Five-Year CIP Budget (FY 2011 – FY 2015)

Fiscal Year	Projected Capital Spending
2011	139,990,684
2012	96,561,097
2013	63,837,990
2014	50,897,770
2015	51,023,658
Total	402,311,199

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**Figure 2.1 SD1 Expenses: Annual Debt Service, O&M, and CIP
(FY 2011 through FY 2015)**



2.1.2 Billing

Monthly Billing and Low Income Assistance

As an additional effort to help reduce the financial burden placed on ratepayers, SD1 has partnered with a local social service agency to develop a Low Income Assistance Program. During FY 2010, SD1 began implementing a one-year pilot program that provides families at or below 125% of the Federal Poverty Guidelines a 25% discount on sanitation service. Nearly 700 accounts received assistance for at least one billing, for a total of approximately \$40,000 in assistance funds provided. Because of its success, SD1 will continue to offer the program through FY 2011.

2.1.3 Alternate Sources of Funding

Although SD1 receives adequate funding from its operating revenue sources to fund its O&M commitments, these sources do not provide sufficient funding to also support the CIP. SD1 is therefore required to borrow money from other sources. During FY 2010, user rates and fees made up approximately 32% of the total funding sources, while borrowed money accounted for the remaining 68% of necessary funding sources to support the fiscal year budget.

American Recovery and Reinvestment Act (Stimulus) Projects

The American Recovery and Reinvestment Act of 2009 provided \$4 billion in Clean Water State Revolving Funds nationwide and approximately \$50 million to Kentucky. During FY 2010, the following projects were approved for financing through the Kentucky Infrastructure Authority's Economic Recovery Fund (ERF):

- Banklick Creek Sanitary Sewer Line Stabilization . \$395,000 with 52.1% principle forgiveness at 2.2% interest over 20 years
- Banklick Creek Wetlands Project . \$1,371,545 with 52.1% principle forgiveness at 2.2% interest over 20 years
- Regional Bioretention Facility . \$1,578,539 with 52.1% principle forgiveness at 2.2% interest over 20 years
- Terraced Reforestation of Interstate Right-of-Way . \$834,241 with 52.1% principle forgiveness at 2.2% interest over 20 years

Revenue Bonds

In April 2010, SD1 sold \$75 million in revenue bonds at a true interest cost of 3.6%, which is the lowest rate SD1 has received for its bonds. Prior to the bond sale SD1 received a credit rating of Aa2 from Moody's and AA/stable rating from Standard & Poor's. Because of this favorable credit rating, SD1 was able to keep additional basis points from being added to its true interest cost. If SD1 would have been rated at a Single A rating it is likely that an additional 50-100 basis points would have been added, which equates to over \$7.8 million in additional interest over the life of the bonds.

2.2 Capacity Assessment & Assurance

The purpose of SD1's Capacity Assessment & Assurance Program is to determine the overall capacity of the collection, transmission, and treatment components of our system, identify areas that are lacking adequate capacity, and develop programs and solutions to provide sufficient capacity in these areas. This program provides staff with a holistic understanding of SD1's systems' capacity, which allows for better management, design, and control of the system.

2.2.1 Field Inspections and Flow Monitoring

During FY 2010, SD1's wet weather investigation group's SSO and CSO investigation crews continued to perform routine inspections before, during and after rain events at prioritized recurring, inactive and suspected SSO locations to understand and verify overflow activity and the need for sewer overflow response cleanup. This is part of SD1's ongoing effort to characterize and verify overflows throughout the collection systems and ensure they are categorized accurately and cleaned up after rain events. Proper characterization of overflows ensures that the hydraulic model that SD1 utilizes maintains and improves upon its accuracy and helps identify the most appropriate and effective solutions for eliminating the SSOs.

In addition, 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 collect pre and post construction monitoring data in improvement projects areas. The map provided in Appendix B highlights the 58 monitoring locations crews monitored during the reporting period, which includes:

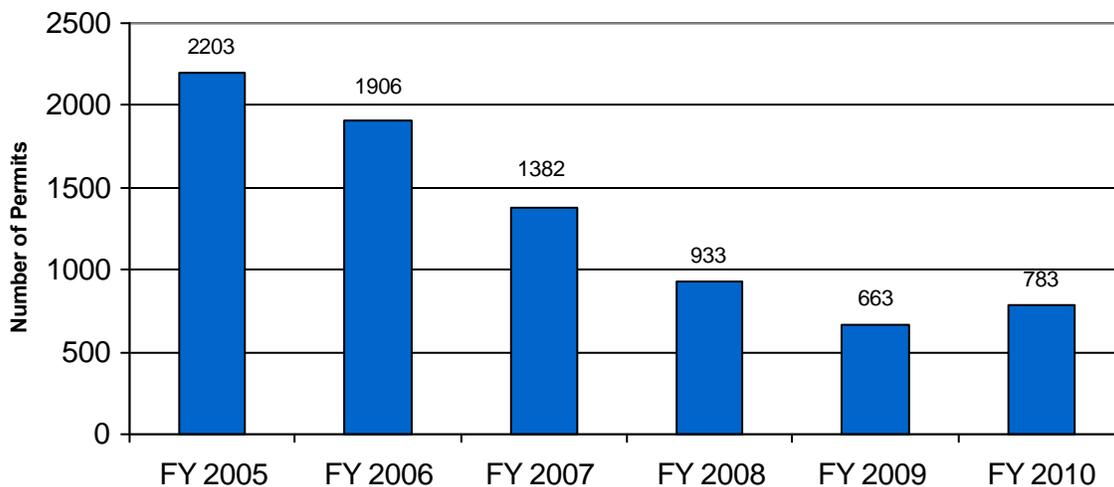
- 3 pre-construction only monitoring sites
- 6 post-construction only monitoring sites
- 7 pre and post-construction monitoring sites
- 20 sanitary sewer evaluation survey (SSES) monitoring sites
- 22 capacity monitoring sites

2.2.2 Reservation of Capacity

Capacity Connection Permits

SD1 issued 783 capacity connection permits during FY 2010. As depicted in Figure 2.2, the number of permits issued has declined throughout the past five years but increased slightly during FY 2010.

**Figure 2.2 Capacity Connection Permits Issued
(FY 2005 through FY 2010)**



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2.3 Communication & Customer Service

The purpose of SD1's Communication & Customer Service Program is to inform and educate staff, external customers, and community groups about the services SD1 offers, including:

- Wastewater collection and treatment
- Storm water collection and management
- Flood protection and drainage
- Industrial monitoring
- Water quality monitoring
- Environmental education

Several internal and external communication initiatives took place during the current reporting period, the highlights of which are included throughout the remainder of this section.

Communication/Customer Service Direction

SD1 performed an organizational assessment and determined that there was a need to focus more on the internal and external communication efforts throughout SD1. To focus on the internal communication efforts, the communication department conducted meetings throughout the organization to assess where communication needed to improve. As a result of the meetings, roles were redefined to place emphasis on communication for the following areas: strategic planning, employee communication, customer communication, governmental affairs, regulatory compliance and community outreach.

Since April 2010, SD1 has put great effort towards focusing on external communication efforts, and has established goals to improve SD1's brand, establish consistent messages and use unique ways of reaching target audiences. To reach these goals, the communication department engaged in department networking, by attending other department meetings, in order to stay connected with the communication needs across SD1. Department networking also allows the communication department to identify needs that overlap and to avoid duplicate efforts in communicating with the community.

2.3.1 Conference & Community Group Presentations

Public Education Presentations

As an ongoing educational initiative and a means to share industry information, SD1 staff and consultants make many presentations throughout the year regarding CMOM and other Consent Decree-related information. The target audiences of these presentations include stakeholders at both the local and national level.

Table 2.2 highlights the name and venue of some of the presentations that took place during FY 2010.

Table 2.2 FY 2010 Conference & Community Group Presentations

Date	Forum	Presentation Title
7/7/2009	City of Covington Caucus Meeting	Storm Water Asset Transfer
7/13/2009	Boone County Water District Commissioners Meeting	SD1's Watershed Approach
7/18/2009	Kenton County Cities Meeting	SD1 Update
7/20/2009	Northern Kentucky Area Planning Commission Meeting	SD1's Watershed Approach
7/27/2009	Congressional Leadership Program	Northern Kentucky - How Do We Compete?
7/28/2009	Campbell County Fiscal Court Meeting	Storm Water Asset Transfer
9/23/2009	Historic Licking Riverside Civic Association	SD1's Watershed Approach
9/24/2009	Boone County Businessman's Association	SD1's Watershed Approach
10/10/2009	Water Environment Federation's 2008 Annual Technical Exhibition and Conference	WEF/WERF Stormwater and Wet Weather: Approaches and Tools for Achieving Compliance
10/13/2009	Water Environment Federation's 2008 Annual Technical Exhibition and Conference	Integration of Field Inspection Data and Automated Analysis Streamlines Sewer System O&M and Rehabilitation Work for SD1
10/13/2009	Water Environment Federation's 2008 Annual Technical Exhibition and Conference	Asset Management Made Easy - SD1's Continuous Sewer Assessment Program Implements Practical Asset Management
10/13/2009	Water Environment Federation's 2009 Annual Technical Program	An Innovative Approach to Identifying Opportunities for Non-Point Source Pollution Control Across Multiple Watersheds
11/4/2009	Boone County Planning Commission Meeting	SD1's Watershed Approach
12/9/2009	Kentucky Stormwater Management Seminar	Implementing a Holistic Wet Weather Program %Adaptive Watershed Management+
1/25/2010	City of Lakeside Park Residents and Council Public Meeting	Lakeside Park Arcadia Public & Private Source I/I Removal Project
6/7/2010	City of Ft. Thomas City Council	Vernon Lane Public & Private Source I/I Removal Project

Date	Forum	Presentation Title
6/14/2010	WEF 2010 Collection Systems Conference	Backing Them Up - Staging Inline Storage and Green Infrastructure as Low Cost Steps Towards Controlling a Big CSO - Willow Run CSO
6/15/2010	WEF 2010 Collection Systems Conference	Cleaning Large Diameter Interceptors: Everybody Knows They Need to Do It, But Doesn't Want to Admit It
6/15/2010	WEF 2010 Collection Systems Conference	Do Not Forget the Force Mains!!!! SD1's Asset Management Program for PSs and Force Mains
6/15/2010	WEF 2010 Collection Systems Conference	What if Industrial Flows Don't Make It to the Plant? Determining and Addressing Potential Water Quality Impacts of Non-Domestic Dischargers in a Combined Sewer System
6/15/2010	WEF 2010 Collection Systems Conference	Knowing Your Pump Station's Stress Level
6/16/2010	WEF 2010 Collection Systems Conference	Don't Let Your Model Sit on a Shelf: Are You Getting the Most Out of Your Model?
05/10/2010	American Academy of Environmental Engineers Workshop - Clean Water Act and the Role of Environmental Engineers; Time for a change?	Expert Panel - Sector Perspectives

2.3.2 General Public Education Efforts

In addition to the conference and community group presentations, SD1 has taken numerous other approaches, as described below, to engage and inform the general public on issues relating to SD1's services.

Publications

As a routine part of SD1's communication efforts, educational information is published in *What's Happening*, a county-specific publication that is mailed to every resident in Boone, Campbell and Kenton counties. During FY 2010, SD1 had educational information published in eleven different issues of *What's Happening* throughout the three counties. Appendix C highlights a few examples of these educational publications.

In addition to the "What's Happening" articles, other SD1 initiatives have been featured in the following publications and newspaper articles during the current reporting period:

- Sewer Service: What SD1 is Building (8/4/2009) . *The Campbell County Recorder*
- Help Prevent Fats, Oils, and Greases from Damaging the Environment (Volume 14 . Issue 4 12/2009) . *Ft. Mitchell Focus*
- Keeping Kentucky Clean (12/2009 Issue 4) . *World Tunneling*

Green Infrastructure Publication

In May 2010, SD1 published "Implementing A Green Infrastructure Plan" to educate stakeholders about SD1's green infrastructure projects underway in Northern Kentucky and to highlight the environmental, economic and social benefits of each project. This publication was designed to provide an in-depth look at the innovative solutions SD1 is using to meet today's challenges of managing a regional storm water and wastewater utility. Approximately 300 copies of this publication were distributed to various community stakeholders, including groups such as the Watershed Community Council, EPA and KDOW. The publication is also available on SD1's website.

Television

In September 2009, SD1 joined forces with Boone, Campbell, and Kenton County Solid Waste Coordinators to produce a 3 minute segment for WCPO's, the local ABC affiliate, "Living Green" primetime special series. The segment discussed household hazardous waste and how it should be properly disposed in order to protect the environment, as well as water quality. The segment aired on September 15, 2009. As a part of this educational initiative, during the 5:00 p.m. and 6:00 p.m. newscasts, SD1 personnel and county employees staffed a phone bank to answer calls and questions from the public on household hazardous waste.

2.3.3 New Website

In August of 2009, SD1's website was compromised and temporarily taken out of service. Although no customer data was affected, SD1 decided it would be in the best interest of the organization and its ratepayers to upgrade the site to protect against a similar issue in the future.

SD1's new website was launched in May of 2010. The site was designed to be more user-friendly and easier to navigate. To accomplish this, a menu was developed and is located on the left side of every page. This menu allows customers to have immediate access to features such as upcoming events, recent news, current contracts out for bid and online bill pay. A new document library was also added to the site. This feature allows users to search by category or use the search feature to enter key words and search every document on SD1's site.

2.3.4 Customer Service Surveys

In an effort to better serve our customers, SD1 developed surveys that help rate the level of service customers receive when they either have a project going on in their area or they call us with an issue. To ensure a high response rate from the customers who receive a survey to complete, the surveys were designed as door hangers with return address information and pre-paid postage on the backside. During FY 2010, 158 surveys were returned. Of those 158 surveys, 129 were surveys regarding trouble calls, and the other 29 surveys were in regards to projects going on in the customer's area. Table 2.3 depicts the results of the surveys that were returned in FY 2010.

Table 2.3 Customer Service Survey Results

Trouble Calls Survey						
	Possible Answers					
Questions	Yes	No	Blank			
Do you feel that SD1 employees responded to your issue in a timely manner?	127	0	2			
	Excellent	Very Good	Good	Fair	Poor	Blank
The level of satisfaction achieved with the resolution offered by SD1 was:	80	31	13	2	1	2
The friendliness and availability of SD1 staff to answer questions was:	99	27	2	0	0	1
Capital Improvement Projects Survey						
	Possible Answers					
Questions	Yes	No	Blank			
Did you receive notification prior to the beginning of construction explaining/describing the project and what to expect?	26	3	0			
	Excellent	Very Good	Good	Fair	Poor	Blank
The accuracy of the information received regarding what to expect throughout the construction process was:	9	8	5	4	3	0
The efforts made by SD1 to ensure that both their employees and contractors were easily identifiable were:	11	8	6	2	1	1
The friendliness and availability of SD1 staff to answer questions:	13	6	5	4	0	1

2.3.5 Watershed Community Council

In November 2007, SD1 formed a Watershed Community Council to share information and help facilitate open, thoughtful discussion on the watershed planning process. The Council is comprised of 53 members from a diverse group of stakeholders, including environmental organizations, home builders, the development community, local government and citizens. The council met one time during FY 2010 to discuss the following agenda items: Western Regional Tunnel and Water Reclamation Facility project updates, green and stimulus project updates, asset management and budget summary/rate scenarios.

2.4 Compliance

The purpose of SD1's Compliance Program is to satisfy The Clean Water Act pretreatment regulations and comply with the National Pollution Discharge Elimination System permit by identifying and controlling residential, commercial, and industrial sources of flow that could adversely affect the collection system. This program encompasses both the Industrial Pretreatment Program and Grease Control Program (see Section 3 for an update on SD1's Grease Control Program).

2.4.1 Permitting

The Compliance Program provides the authoritative measures necessary to permit and monitor discharges from commercial and industrial users that may cause corrosion or blockages in the collection system. SD1 currently has a total of 54 permitted Significant Industrial Users in its collection system. US Playing Card in Erlanger was newly permitted during FY 2010.

SD1 approved the following five short-term specialty discharges during the current reporting period:

- Turfway Office Park . Unusual Discharge (glycol and water)
- Northern Kentucky University . Unusual Discharge (floor cleaning)
- Walmart . Two Unusual Discharges (floor cleaning)
- Hahn Automation . Unusual Discharge (floor cleaning)
- Duke Realty . Unusual Discharge (floor cleaning)

2.4.2 Monitoring & Enforcement

The purpose of the Industrial Pretreatment Monitoring Program is to monitor discharges from industrial users throughout the service area to ensure compliance with Article 5 of SD1's Sanitary Rules and Regulations and to protect SD1's sanitary sewer system, treatment plants, employees, and the receiving waters. All permitted industries are inspected annually and monitored semi-annually, with additional inspection and sampling performed as needed. During FY 2010, SD1 issued 45 Notices of Violation and \$4,500 in administrative fines. Refer to Appendix D for a summary report describing these violations in more detail. SD1 has an Enforcement Response Plan in

place to address each violation appropriately. Typically, the first Notice of Violation issued is verbal (and documented in a computerized program management system), the second violation is written, and then each subsequent violation is attached with a fine. Fines can range anywhere from \$500 to \$1000 depending upon the violation. Most issues are resolved before fines escalate. If the problem persists, an industry is put on a compliance schedule.

2.5 Continuous Sewer Assessment

The purpose of the Continuous Sewer Assessment program (CSAP) is to utilize a proactive and coordinated asset management-based approach to assessing the condition and life cycle of SD1's infrastructure and managing a cost-effective rehabilitation/replacement of the system. Implementation of this program has enabled SD1 to more effectively and proactively prioritize and implement system inspection, cleaning, and rehabilitation/replacement of its assets.

The CSAP is a high-level program comprised of the following six specific O&M activities that work in conjunction to assess and maintain the collection system:

- Interceptor Program – targets the maintenance and condition assessment of main trunk and interceptor sewers
- Large Diameter Sewer Assessment Program . focuses on the maintenance and condition assessment of sewers in the combined sewer system with pipes typically 15-inches and larger in diameter and high consequence of failure
- Manhole Inspection Program . assesses manholes throughout the collection system to determine the extent of structural defects, signs of sewer surcharge, and risk of I/I
- Preventive O&M Program . prioritizes the condition assessment, maintenance and repair/rehabilitation of the collection system to proactively prevent system failure that can cause overflows
- SSES Program . identifies and assesses the sources of I/I throughout the collection system
- Trouble Call Program . provides response to calls from customers who suspect problems related to the sanitary sewer service

Appropriate inspection technologies such as flow monitoring, closed circuit television (CCTV), smoke & dye testing, sonar, and visual inspection are used in the assessment phase of the O&M programs. CSAP classifies pipes by using the Sewer Condition Risk Evaluation Analysis Model¹ (SCREAM) to generate structural and maintenance scores for each pipe inspected. The structural and maintenance scores then identify appropriate schedules for recommended next actions such as re-inspecting, cleaning, repair, or complete rehabilitation or replacement.

Together, the activities of each O&M program ensure that SD1 is meeting the overall objectives of the CSAP as demonstrated by the program process diagram in Appendix E. The remaining portions of this section highlight the collective progress of the six O&M programs in meeting the assigned performance goals and targets of the overall

CSAP. The data provided for previous years has been updated based on improvements in gbaMS recordkeeping over the past FY.

2.5.1 Collection System Condition Assessment

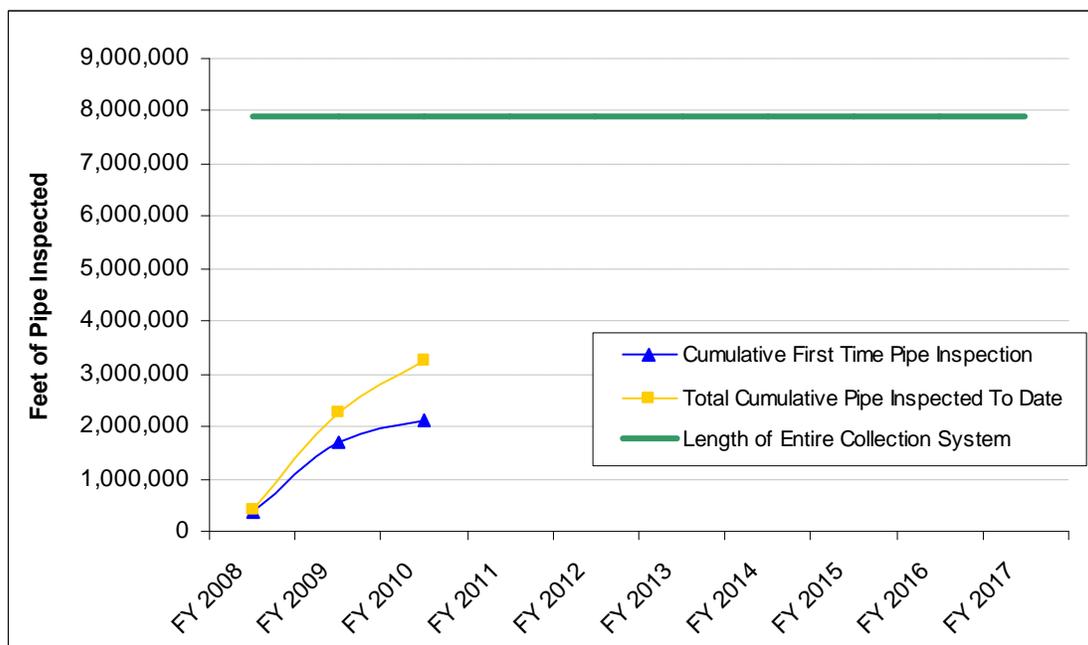
Sewer Inspections

Table 2.4 outlines the amount of pipe inspected since the onset of the CSAP through the end of the current reporting period. Figure 2.3 shows SD1's progress of inspecting its entire collection system in 10 years.

Table 2.4 Sewer Inspection Footage

	Initial Inspection Footage	Follow-Up Inspection Footage	Total Cumulative Footage
FY 2008 (Jan-June)	374,068	46,898	420,966
FY 2009	1,340,874	498,113	1,838,987
FY 2010	421,130	589,519	1,010,649
Total To Date	2,136,072 (27% of system)	1,134,530	3,270,602

Figure 2.3 Sewer Inspection Progress



Catch Basin and Manhole Inspections

SD1 inspects upstream and downstream manholes during all sewer inspections, unless the manholes have had an inspection within the last 12 months. Also, SD1-owned catch basins are inspected at least once per year. Table 2.5 summarizes the number of catch basin and manholes inspected since the onset of the CSAP through the end of the current reporting period.

Table 2.5 Catch Basin & Manhole Inspections

Period	Number of Catch Basin Inspections	Number of Manhole Inspections
FY 2008 (January . June)	986	2,050
FY 2009	1,774	7,238
FY 2010	4,168	1,933
Total Inspected	6,928	11,221

2.5.2 Collection System Maintenance

Sewer Cleaning

Cleaning is critical in maintaining the capacity of the sewer system and preventing overflows. SD1's prioritization process ensures that cleaning activities are done in a cost-effective manner and only on pipes in need of cleaning. The program's logic can be found in the CSAP process diagram in Appendix E. The cleaning program classifies pipes by using SCREAM Model's maintenance scores and identifies appropriate schedules for re-inspections, re-cleaning, and when the pipe should be reviewed for a permanent solution in lieu of continued cleaning.

Table 2.6 provides an overview of the length of pipe cleaned in accordance with the cleaning program logic since the onset of the CSAP through the end of the current reporting period.

Table 2.6 Sewer Cleaning Footage

Period	Footage of Pipe Cleaned
FY 2008 (January . June)	113,695
FY 2009	439,191
FY 2010	737,613
Total Feet Cleaned	1,290,499

Pipes with high re-occurring maintenance scores enter the Permanent Solution Phase of the cleaning program and undergo further evaluation. Taking into consideration the pipe's structural and maintenance condition, a life-cycle cost analysis is performed to determine if it is more cost-effective to continue to inspect and clean the pipe on a regular preventive maintenance (PM) schedule or to permanently repair or replace the pipe. To date, SD1 has 5,045 feet of pipe on its permanent PM cleaning list. The

cleaning and re-inspection frequencies vary depending on the condition of the pipe, the rate of return of the blockage, and other factors such as number of backups, trouble calls and overflows. SD1's permanent PM cleaning list will continue to evolve as additional inspection data is collected, as solutions for the remaining pipes are identified, and as other new pipes are identified as needing corrective actions.

Catch Basin and Grit Pit Cleaning

In January 2009 SD1 began tracking the amount of debris removed during catch basin and grit pit cleaning. During FY 2010, SD1 removed approximately 433 yards of debris from catch basins and 362 yards of debris from grit pits.

Rehabilitation and Replacement

SD1 Collection System construction crews and SD1's approved maintenance contractors perform repair, replacement and rehabilitation work. The work schedule is determined by various criticality factors and the proximity of these pipes to priority watershed areas. Pipes requiring emergency work because of the potential for immediate failure are scheduled for an immediate repair upon discovery. Additional considerations that may determine if the schedule should be accelerated for a solution are factors such as proximity to overflows, lack of hydraulic capacity, and proximity to other pipes being fixed.

Table 2.7 describes the rehabilitation and replacement activities performed by SD1's internal construction crews and outside contractors since the onset of the CSAP through the end of the current reporting period.

Table 2.7 Rehabilitation & Replacement Activities

Activity	FY 2008 Total	FY 2009 Total	FY 2010 Total	Combined Total
Feet of Sewer Lines Replaced	8,459	15,421	25,529	49,409
Feet of Sewer Lines Rehabilitated (cured-in-place piping)	1,081	3,204	12,872	17,157
Feet of Sewer Line Repaired	3,149	2,523	3,710	9,382
Number of Misc. Sewer Repairs	33	41	5	79
Number of Manhole Repairs	548	370	317	1,235
Number of Manhole Replacements	35	63	80	178
Number of New Manhole Installations	16	53	40	109
Number of Catch Basin Repairs	68	115	71	254
Number of Catch Basin Replacements	81	209	203	493
Number of New Catch Basin Installations	0	4	2	6

2.6 Emergency Preparedness & Response

SD1's Sewer Overflow Response Plan (SORP) is an operational document that emphasizes emergency response activities to contain, mitigate, and clean residuals from overflows. The long-range objective of the SORP is to provide a framework whereby proper documentation of each event will help establish permanent overflow abatement programs to be incorporated into SD1's Watershed Plans. SD1's SORP as amended July 10, 2009 received regulatory approval on November 10, 2009.

2.6.1 SORP Training

SD1 held annual SORP training during February, March and April 2010, at which time all employees received his or her appropriate level of training. SD1's training program is organized into two levels of education . an Awareness Level and an Operations Level. Employees involved at the Awareness Level, which includes slightly more than half of the workforce, receive SORP-related information through sources such as the organization's website and Intranet site and various other informational pieces distributed to employees throughout the year.

Personnel in collection systems construction and customer service, and plant operations receive training at the Operations Level, and are required to attend an initial seven-hour course and annual refresher courses. Operations Level trainees also receive continuous hands-on training in the field during actual overflow response events.

2.6.2 SORP Annual Review

Under the Consent Decree, SD1 is required to perform annual reviews of the SORP and make adjustments as necessary. Specifically, Section 36(c) states that:

36. (c) Specific CMOM Program Development – Sewer Overflow Response Plan (“SORP”). By no later than each anniversary date of the approval of the SORP, the District shall annually review the SORP and propose changes as appropriate subject to Cabinet/EPA review and approval.

SD1 conducted meetings in February, April, June, July, and October 2010 to review the SORP and there are no proposed material modifications to the SORP that resulted from this review process. Several minor updates were made to Section 5 to reflect changes in the training program, and the following appendices were updated to provide the most current information:

- Appendix E . Wet Weather Investigation Routes
- Appendix G . Routine CSO Inspection Routes
- Appendix L . SORP Trainer's Guide

During the review process SD1 identified the need to create a standard operating procedures handbook for Operations Level employees. This handbook is currently being developed.

2.7 Information Management Systems (IMS)

SD1 has continued its efforts to automate the CSAP to eliminate the need for manual data entry and work order generation. The programming for the automation of the CSAP process diagram logic is fully functional and has replaced the use of the interim database. The final CSAP database development and automation communicates directly with gbaMS through a work order generation tool that is currently being used to generate automatic next action work orders for cleaning, re-inspection, work scheduling, and permanent solution determinations.

The CSAP automation also encompasses a feature for determining the rehabilitation and replacement options for asset renewal. This feature is known as the Corrective Action Logic. This feature uses costing tables and life-cycle costing analysis to produce a comparison for each pipe in order to determine whether it is more cost-effective to continue to clean, repair, rehabilitate or replace each pipe. The programming for this feature is complete and is currently being used to aid in maintenance and rehabilitation decision options. Over the next year, SD1 will continue to refine these tools to enhance their functionality and increase the efficiency of SD1's decision-making and rehabilitation capabilities.

2.8 Legal Authority

The purpose of SD1's Legal Authority Program is to:

- Implement and enforce SD1's Rules and Regulations
- Assist in the development of policies and guidance
- Implement SD1's existing policies and guidance
- Comply with applicable state and federal laws
- Keep informed of relevant legal issues and state and federal policies and guidance
- Reduce legal liability and manage risk
- Provide staff with legal support and advice
- Effectively manage litigation
- Continuously review and revise legal authority as needed to further the mission of SD1
- Provide legal counsel for timely, effective, and cost-efficient implementation of the Consent Decree, including coordination with regulators and legal review of all plans submitted pursuant to the Consent Decree

2.8.1 Customer Bill of Rights

During FY 2010, SD1 worked to create a Customer Bill of Rights that details the customer service policies and commitments of the organization. The final document, shown in Appendix F, was published in July 2010. The purpose of this document is to communicate SD1's commitment to quality customer service, improve customer understanding, and to help SD1 focus and develop core customer service policies. This information is posted in SD1's main office lobby and on its website.

2.8.2 Private Sewer Laterals

Sewer Lateral Repair and Illegal Connection Inspection and Enforcement Policy

Of the 453 trouble calls related to building backups during FY 2010, 34 were determined to be SD1's responsibility and 419 were the responsibility of private owners. The backups determined to be the responsibility of private owners were due to causes such as breaks and blockages in private service laterals. SD1's Board of Directors has adopted several amendments to the Sewer Lateral Repair and Illegal Connection Inspection and Enforcement Policy in order to more efficiently address private lateral issues and remove private source I/I. The most recent version of this policy can be found in its entirety in Appendix G. SD1 will continue to assess its role in addressing and funding private source lateral and I/I removal issues and make future amendments and/or implement new policies and programs as deemed necessary.

Financing and Grant Program for Defective Private Lateral Repairs and Removal of Illegal Connections Outside Public Roadways

SD1 established a program during FY 2008 to provide financing and/or funds to eligible property owners faced with the obligation to perform excavation and repair work of private laterals outside public roadways.

Through this program, SD1 may advance funds for payment of a licensed plumber to conduct the necessary improvements, and offer a finance option to allow the property owner to repay SD1 with interest. The interest is set at a rate of two basis points above prime rate at the time that financing is initiated over a term not to exceed 15 years. To date, SD1 has provided approximately \$66,500 in financing to 20 property owners (approximately \$6,000 will be repaid through the grant funds described below).

As part of a Supplemental Environmental Project under the Consent Decree, SD1 may also reimburse qualified residential property owners for a portion of the costs of certain sanitary sewer improvement projects. Candidate projects include the repair or replacement of failing sanitary service laterals and the installation of new sanitary service connections to SD1 sewer mains. Approved residential property owners may be eligible to receive grants of up to \$5,000 towards such projects, depending on their income level. To date, SD1 has provided approximately \$192,000 in grant funding to help 72 qualified property owners make sanitary sewer improvements.

2.8.3 Records Management

SD1's records management program is managed by an in-house Records Coordinator who works in cooperation with staff of the Kentucky Department for Libraries and Archives. The Records Coordinator also works with various records liaisons appointed throughout the organization to control SD1's records according to the adopted retention schedule, and to ensure that permanently valuable records are preserved, protected, and available for use. SD1's Board of Directors has adopted several amendments to its Records Management Policy, and the most recent version updated of this policy can be found in its entirety in Appendix H.

Document Management System

In March 2009, SD1 began its implementation of Laserfiche, a document management system, to further enhance its records management efforts. The implementation process began in the accounting and human resource departments and has moved to other work groups throughout FY 2010. SD1 will continue its phased-in implementation of this system during FY 2011. Once implemented, this system offers SD1 the following benefits:

- Records can be easily accessed, shared, and tracked via an audit trail
- Records can be protected from being altered (tiff image vs. pdf), making them admissible in a court of law
- Provides customized document retention, which is maintained and monitored by the system
- Reduces the need for paper file storage space
- Encourages consistent and proper filing procedures
- Reduces discovery time for litigation and open records requests
- Helps eliminate duplication of documents
- Improves the efficiency of work flow
- Ensures recovery of documents in case of disaster

E-mail Transition

As an additional effort to properly manage records, SD1 has invested in a Google E-mail and archiving system that automatically archives all E-mails. Individual users no longer have the ability to determine which E-mails should be retained. Only the E-mail administrators have access to the system-wide archive in order to eliminate records in accordance with the applicable records retention schedule and procedures.

During the early spring of 2010, SD1 IT staff evaluated several messaging, scheduling, archiving, and collaboration platforms as possible alternatives to SD1's current email system. The key features that were needed for a successful solution included:

- Proven archiving solution with administrative searching capabilities.
- Quality tool (possibly third party) to allow an automated migration of user messages and calendar entries.
- Integration with mobile platforms including Blackberry and Android.
- If hosted, at least 5GB/user storage capabilities.
- Proven anti-spam / anti-malware integration.

The selected system, Google Apps, provides a familiar web-based user environment for email management and allows each user 25GB storage space. In addition to core Google Apps services, SD1 subscribed to the proven Postini email security and archiving service to ensure that email passes through rigorous security testing and is placed in the company email archive prior to being delivered to the user. The Google Apps service is easily available on Android devices and is available to company Blackberry Enterprise Server users (BES/Exchange Edition) through the %Google Apps Connector for BlackBerry Enterprise Server+. As of December 2010, SD1 has approximately 35 Blackberry and 20 Android based phones connected to its Google Apps environment.

The decision to migrate SD1's electronic messaging and scheduling from Novell Groupwise to Google Apps occurred in May 2010 with guidance from senior management, with the actual migration occurring in August 2010. The migration was a coordinated effort between SD1's IT and Communications Departments and included several user training classes prior to the actual migration date. During the final months of 2010, the focus was to encourage users to work with the various products to increase basic familiarity with Google Apps and to submit any usability questions or concerns to be included in additional training efforts conducted in 2011.

The transition to an entirely new messaging and calendaring system was successful. As of December 2010, the IT Department continues to address user concerns and answer usability questions as they arise. The IT Department will continue working with all departments as needed to ensure continuing current success and future adoption of Google Apps products as SD1's platform of choice for messaging, calendaring, and collaboration efforts.

2.8.4 Sanitary Rules and Regulations

To meet the Consent Decree requirements associated with the development and enforcement of a Grease Control Program, SD1 updated its Sanitary Rules and Regulations to establish the appropriate legal authority to control the discharge of grease into the sanitary sewer. SD1 received regulatory approval of its proposed revisions to Articles 1 and 5 from the KDOW on October 12, 2010. (See Section 3 for a more detailed description.)

Comprehensive Review

SD1 began a comprehensive review of its Sanitary Rules and Regulations during FY 2009 with the following goals in mind:

- Ensure consistency in format and terms
- Update rules and regulations where appropriate to support necessary legal authority and operational changes
- Evaluate and revise the document's organization to improve readability
- Ensure requirements are clearly communicated

During FY 2010, SD1 met with various departments to review preliminary revisions that were identified during FY 2009. SD1 will continue to work on this initiative during FY 2011 and additional progress will be reported in future annual reports.

2.9 New Connection Tap-In

The purpose of SD1's New Connection Tap-in Program is to ensure standard policies and procedures are in place to approve and perform connections to the sewer system. The objectives of this program are to:

- Accommodate economic development throughout the Northern Kentucky region.
- Eliminate the number of illegal and improper taps made throughout the collection system.
- Ensure all connection fees are paid and all new connections are put on billing.
- Maintain the integrity of the sewer system by reducing the amount of I/I that can enter the system through bad taps or improper abandonment of service laterals.
- Protect the integrity of our system by enforcing the use of proper materials.
- Provide an avenue for SD1 to keep certified tappers informed about changes to the Rules and Regulations or specifications for tapping the system.

2.9.1 Certified Tapper Program

SD1's formal Certified Tapper Program ensures that connections to the sewer system are approved by SD1 personnel and are performed accurately based upon written specifications and procedures. Plumbers interested in becoming certified are required to attend training and pass a written exam. In addition, Certified Tappers must attend a recertification class offered by SD1 every three years. SD1 currently has 159 Certified Tappers representing 99 plumbing companies. Of these 159 Certified Tappers, 15 became newly certified during FY 2010 and 144 attended SD1's recertification class.

2.9.2 Violations and Fines

During FY 2010, SD1 issued eight violations and \$5,250 in fines to seven companies for connecting to SD1's sewer system without obtaining the proper Capacity Permit or Sanitary Sewer Connection Application Permit.

2.10 Organizational Structure

The purpose of SD1's Organizational Structure Program is to provide delineated job responsibilities, outline opportunities for advancement, ensure effective employee supervisor ratios, and guarantee adequate staff is in place to accomplish the mission and vision of SD1. This program also works in conjunction with the annual budget process to determine staffing needs and allocate operational expenses appropriately.

In January 2010, SD1 contracted with a third party to evaluate the O&M activities and business services that take place throughout the organization as part of a continual planning effort aimed at maintaining and improving a high level of reliability and low

cost. Through the assessment, we were able to determine how SD1's performance compares to industry best practices utilized by industry-leading public sector agencies and private contract operations firms. The main objective of the assessment was to provide a high-level action plan for gaining increased performance and efficiencies.

The following areas of our business are just a few examples of what was reviewed during this assessment:

- Organizational structure
- Lines of authority
- Staffing levels and workload demands
- Strategic plans
- Work flow
- Use of technology
- Scheduling and location assignments
- Job knowledge

The recommendations that resulted from the assessment were categorized into three focus areas: people, practices, and technology. Organizational structure was one aspect of our business that was impacted by the insight gained from the evaluation. Changes were made to the organizational structure in order to achieve some of the following goals:

- Gain efficiencies by grouping people according to function
- Enhance communication / information exchange (both internally and externally)
- Reduce number of direct reports at the executive level to enable more strategic input from the Deputy Directors and to engage senior level management in the oversight of the day-to-day activities
- Provide opportunities for cross training and leadership development
- Move to more proactive operations
- Update position titles to match industry peers

SD1's current organizational charts can be found in Appendix I. Below is a description of the current organizational structure based on some of the recommendations from the assessment. Every function, except for those that are a direct report to the Executive Director, now falls under one of three divisions:

1. Operations: Collection Systems, Treatment & Pump Station Operations, Capital Improvements, and Facilities & Fleet Management

Description: The Operations Division encompasses all employees that are the majority of the organization. The large majority of our staff resides in this division. Whether its operations and maintenance work being done out in the community, at one of our plants, at our administrative office building, or with our fleet, it is mainly performed and managed by the employees in this division.

2. **Engineering:** Water Resources and Planning & Design

Description: The Engineering Division encompasses the large majority of the planning, assessment, and regulatory compliance aspects of our business. Activities such as water quality and biological sampling; green infrastructure; Storm Water Permit and Consent Decree compliance; wet weather investigations; the planning, designing, bidding, and inspections of capital improvement projects; and the review of plans for future development all fall under the various groups in this division.

3. **Administration:** Finance, Purchasing, Accounting, Account Services, Communication, Organizational Development, and Employee Benefits & Payroll

Description: The Administration Division encompasses all business support functions that SD1 needs to operate efficiently and effectively as an organization. Whether it's meeting the financial needs of our business, the communication needs of both our internal and external customers, or the development and support needs of our employees, all main functions now housed within this division provide the organization with the overall support it needs to thrive.

In addition to these three main divisions, there are two other functions that are a direct report to the Executive Director that do not fall within the realm of any of the three divisions:

- **Government Affairs:** Advises the Executive Director on local and national policy issues.
- **Office of the General Counsel:** Advises the Executive Director on the legal matters of the organization, as well as performs documentation and records retention activities.

2.11 **Pump Station Force Mains Preventive Maintenance**

The purpose of this program mirrors the CSAP, in that it utilizes a proactive and coordinated asset management-based approach to assess the condition of its pump stations, force mains, and air release valves and subsequent improvements based upon a combination of risk of failure analysis and consequence of failure analysis (criticality). Through implementation of this program, SD1 can more effectively and proactively prioritize and implement the necessary predictive, preventive, and corrective maintenance required to sustain the reliability of its force mains and air release valves. These proactive measures cost-effectively ensure that all force mains, air release valves, and the associated pump stations throughout the service area are operating at maximum efficiency, thereby reducing the risk of sewage discharges.

For the past two years, SD1 has worked to develop a formal Pump Station Force Main and Air Release Valve PM Program by completing the major tasks identified in Table 2.8. During FY 2010, SD1 completed remaining tasks 4 and 5.

SD1 is currently performing regularly scheduled inspections of its force mains and air release valves, as well as completing the necessary preventive maintenance and corrective repair work identified by the results of these inspections. To sufficiently support the implementation of this program, SD1 has allocated one full-time position and one part-time position to perform the required force main and air release valve inspection work and has dedicated an in-house work area equipped with tools, machinery, and an inventory of spare parts and components for pump stations and air release valves to perform the needed repairs. In addition, all of the high priority force mains and pump stations have been assigned repair priorities and are being addressed through various improvement or repair projects.

Table 2.8 Pump Station Force Main PM Program Development Tasks

Task	Scope of Work	Status
1	Identify all drawings and records available on SD1's force mains and pump stations.	Task complete.
2	Identify the field location and alignment of all SD1 pump stations, force mains and air release valves, and map these locations in GIS and gbaMS.	Task complete.
3	Perform CCTV inspection on all manholes and sewers 1 mile downstream of a force main discharge to assess damage that may be present from corrosive force main effluent and provide recommended improvements.	Task complete.
4	Perform a condition assessment for each pump station and force main on SD1's list of high priority force mains that are in need of immediate attention.	Task complete.
5	Work with SD1 to develop a PM program for all of the force mains and air release valves.	Task complete.

2.12 Safety

The purpose of SD1's Safety Program is to ensure that appropriate measures are taken to eliminate or control the exposure of SD1 employees and the general public to hazards that may cause physical harm, and to comply with local, state, and federal safety codes and legislation. Performing daily operations in a safe manner not only protects our workforce and the community, but also demonstrates fiscal prudence, high employee morale, and results in financial savings for our ratepayers.

2.12.1 Safety Training

SD1 has continued to produce and distribute a Safety Training Calendar that identifies class offerings, instructors, times, and dates of training throughout the year. A copy of the FY 2010 Safety Training Calendar is included in Appendix J. The calendar is posted to the Intranet site, and monthly email notifications are sent to SD1 employees to notify them of upcoming trainings and attendance requirements. Attendance at safety training classes is tracked with Training Tracker software to ensure that each employee meets his or her annual safety training requirements.

2.12.2 Performance Indicators

Table 2.9 outlines the indicators used to measure the success of the Safety Program and SD1's performance in each area during FY 2008 through FY 2010.

Table 2.9 Safety Program Performance

Performance Metric	FY 2008	FY 2009	FY 2010
OSHA Recordables	10	15	19
Worker Compensation Claims	10	9	10
Friendly Reminders Issued	18	1	8
Safety Violations Issued	3	0	4
First Aids	17	17	21

2.13 Smoke & Dye Testing

The purpose of SD1's Smoke & Dye Testing Program is to identify specific sources of rainfall derived I/I into the sanitary sewer system. Smoke & dye testing along with sewer and manhole inspections and flow monitoring comprises SD1's SSES program elements. Smoke testing helps to identify significant sources of storm water I/I, including private service laterals and illegal connections such as downspouts and area drains. Smoke testing can also be used to determine the location of sewer main defects likely contributing to an I/I problem. Dye testing is performed for comprehensive identification of both public and private source I/I connections in areas found to have excessive I/I.

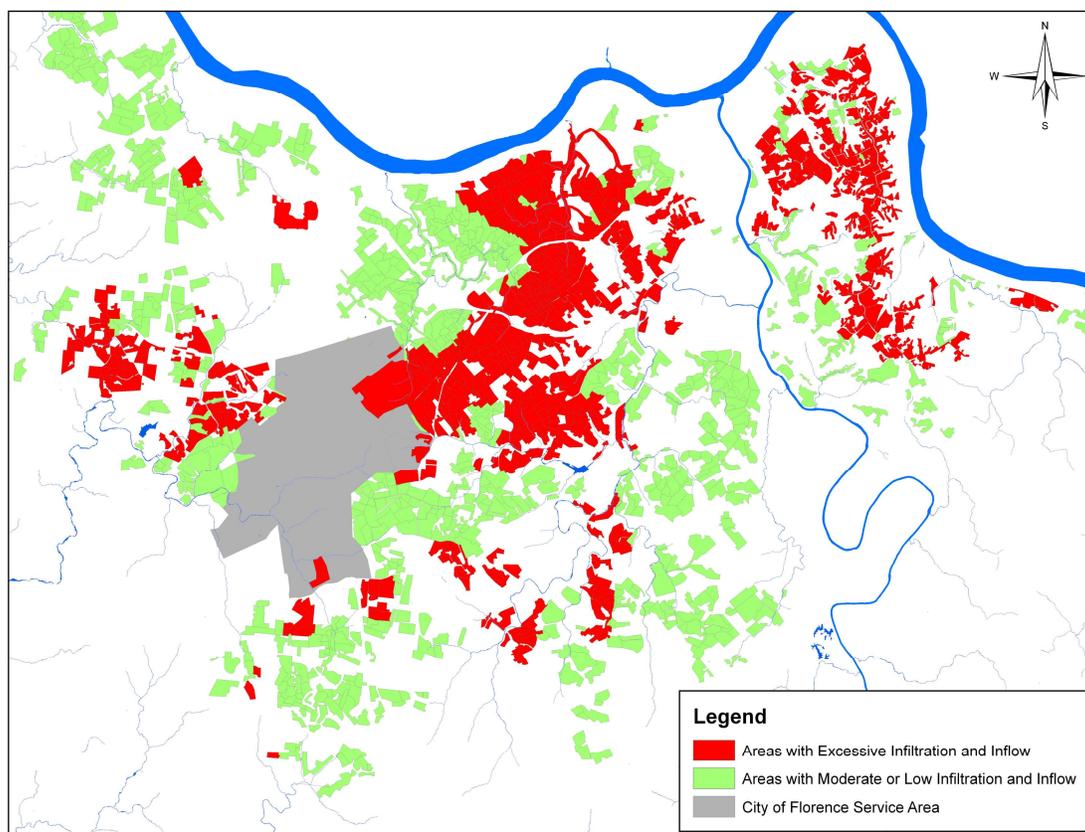
Priority I/I Source Identification & Removal Program

As part of the SSES program, SD1 has budgeted funds as part of its Watershed Plans to implement a Priority Inflow and Infiltration Source Identification & Removal Program designed to reduce and eliminate SSOs through public and private source I/I removal projects. Smoke and dye testing plays a critical role in identifying the sources of I/I as part of this program. The priority watershed areas SD1's smoke and dye crews will initially evaluate as part of this program are known to have extensive I/I and include the Banklick Creek (Lakeview Pump Station) watershed, Taylor Creek watershed, and the watershed area tributary to the Licking River Siphon. The timing and extent of implementation in each area is discussed in SD1's Watershed Plans.

2.13.1 SSES – I/I Assessment Projects

The goal of the SSES program is to identify and remove both public and private sources of rain water derived I/I that is entering the sanitary sewer system to reduce and eliminate sanitary sewer overflows. SD1 has expended significant effort over the last several years, as part of its watershed planning efforts, to identify and quantify the sources of I/I using detailed flow monitoring and smoke and dye testing. The map in Figure 2.4 provides an overview of the areas in SD1's collection system experiencing excessive I/I. Figure 2.4 shows that all areas in red are characterized as having excessive I/I, which represents 45% of SD1's separate sewer collection system. Excessive I/I is defined as 2% or more of the area served by sewers which generates storm water runoff that ends up in the sanitary sewer.

Figure 2.4 Areas of Excessive I/I Across SD1's Collection System



The following information provides a description of the current smoke and dye investigations that occurred during FY 2010 as part of the I/I assessments.

City of Lakeside Park . Arcadia Neighborhood

This project area consists of approximately 190 homes in the city of Lakeside Park and is located in the Dry Creek Watershed. The project area is considered to contribute to a significant public health risk as a result of local SSOs. Because of the high priority of

this area and the known high peak flows during wet weather, SD1 conducted detailed public and private smoke and dye testing during FY 2010 in order to determine both public and private storm water derived I/I source connections to the sanitary sewer. The testing confirmed a significant number of public and private sources of I/I, and SD1 will conduct public and private I/I removal activities in this area during FY 2011. Those activities will generally include:

- Removal of direct storm water connections from approximately 190 homes
- Rehabilitation of 2.8 miles of sanitary sewer and associated manholes
- Rehabilitation or replacement of 4,800 linear feet of storm sewer and associated structures
- Installation of up to 5 regional-type green infrastructure installations to reduce storm water quantity and enhance water quality locally and downstream

By eliminating 50% of the I/I in Lakeside Park, SD1 can eliminate 4 recurring high public health risk SSO locations and the corresponding 0.33 million gallons of overflow volume in the typical year. By removing I/I at the source, downstream overflows in the Dry Creek watershed can also be reduced by 0.28 million gallons in the typical year. The project is estimated to cost approximately \$5.8 million, which saves nearly \$1 million when compared to a traditional conveyance and treatment option. Work is scheduled to begin in the fall of 2011 and be completed in phases by the fall of 2014. Both water quality and quantity will be monitored after construction is complete.

City of Ft. Mitchell . Pleasant Ridge

This project area is located in the Pleasant Run Creek watershed and consists of approximately 140 homes in the city of Ft. Mitchell, which was not initially considered one of SD1's priority watershed areas for I/I investigation. This project area was initially identified through a request by the City of Ft. Mitchell to coordinate during a major street reconstruction project. Because of the known high peak flows during wet weather and the potential cost savings and other project-related benefits associated with coordinating work of this nature, SD1 decided to conduct an evaluation of the collection system in the area during FY 2010. The evaluation included detailed public and private smoke and dye testing to identify storm water derived I/I source connections to the sanitary sewer. Not only did the assessment confirm a significant number of public and private sources of I/I, it also revealed storm and sewer structures in poor condition, numerous homes with illicit connections (sanitary sewage entering the storm sewer system), common manholes for sewer and storm water lines, storm water lines that have constructed bypasses into the sanitary sewer, and sewage was found at storm water outfalls.

Because of these findings, SD1 is currently working in partnership with the City's road reconstruction project to develop an improvement plan for this area that will holistically address the condition of the sanitary and storm sewer assets, existing area storm water flooding, the removal of public and private source I/I and illicit connections, and storm water quantity and quality issues. Opportunities for green infrastructure are also being evaluated to address reductions in storm water peak flows to critical in-stream flow levels to reduce erosion and hydromodification (see section 2.15 for more details) and

improvements in storm water runoff water quality. The project is estimated to cost approximately \$5.0 million, which saves approximately \$2.5 million when compared to a traditional conveyance and treatment option. Work is scheduled to begin in the spring of 2011 and be completed in two phases by the fall of 2012. Both water quality and quantity will be monitored after construction is complete.

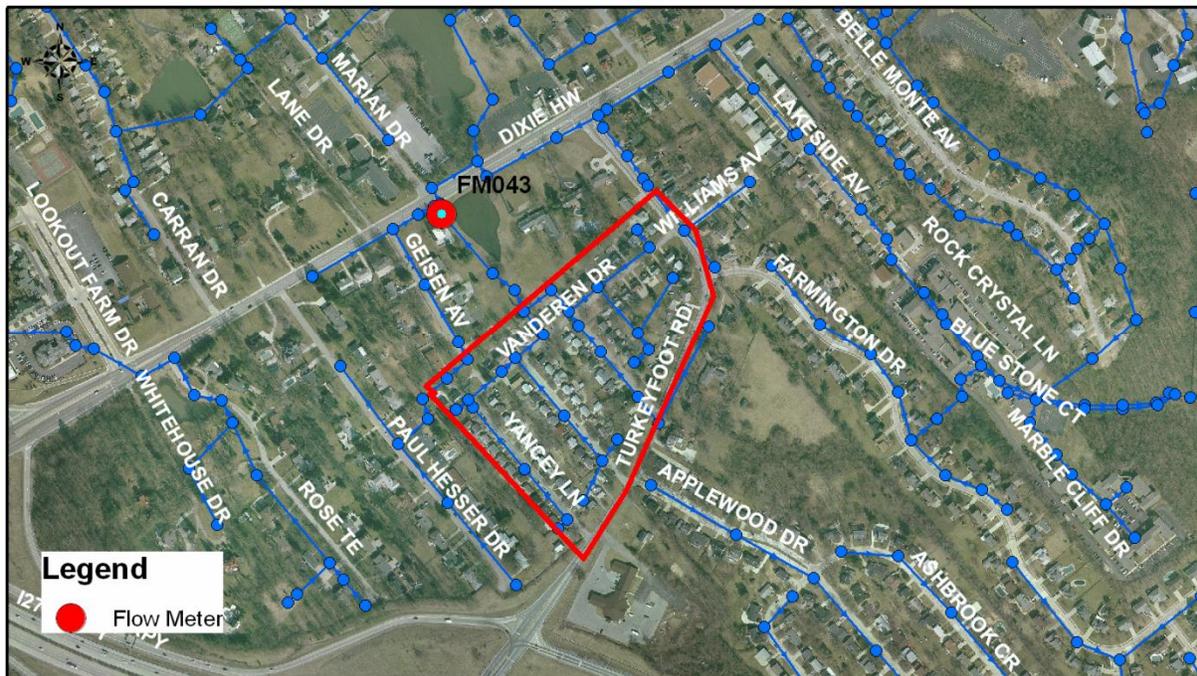
2.13.2 SSES – I/I Removal Projects

The following information provides an update on the current I/I removal projects that developed from the I/I assessments conducted since FY 2009. These projects focus on fixing current assets in a manner that not only addresses the assets maintenance and structural deficiencies but also removes I/I as compared to building new larger assets at considerably higher costs to convey and treat wet weather flows. This approach allows the removal of I/I over time so that expenses associated with future conveyance, operation and maintenance, and treatment are reduced.

City of Lakeside Park - Van Deren Neighborhood

The Van Deren neighborhood is located within the City of Lakeside Park. The Van Deren area is a neighborhood that includes approximately 100 residential parcels and is served with parallel sanitary and storm sewer systems that have 15 common manholes. The project area is shown in Figure 2.5.

Figure 2.5 Van Deren Project Area



This project was initiated when SD1's illicit detection crew found sewage present in the storm sewers within this neighborhood. SD1 also identified significant I/I entering the sanitary sewer system during rain events. SD1 worked with the City of Lakeside Park

since they were the owner of the storm sewers at that time to develop a joint project to eliminate the illicit discharges and sources of I/I. SD1 conducted comprehensive dye testing of all interior and exterior drains in all 100 residences. The testing revealed approximately 20 residences with illicit connections into the storm system and significant sources of public and private I/I. The owners of the 20 residences were required to remove the illicit connections. In many cases, the owner had to replace the failing sanitary lateral on the property in order to eliminate the illicit connection. SD1's 50/50 cost share program for private lateral repairs and I/I removal was provided to the residents to help offset the cost since SD1 benefitted from the I/I removal.

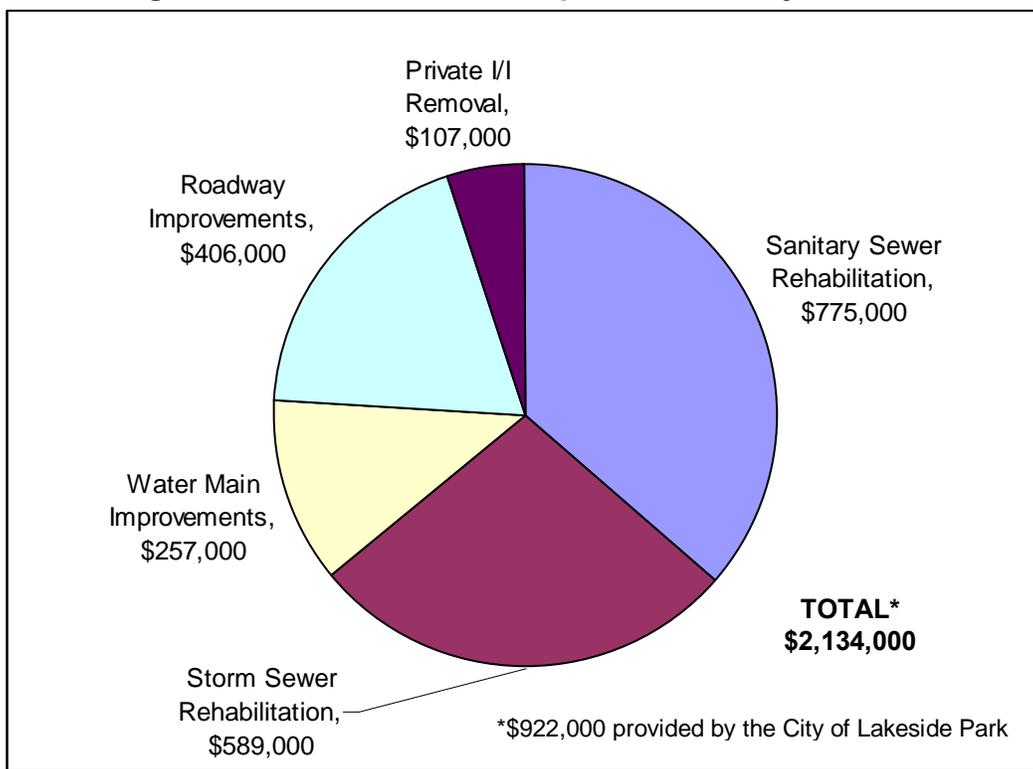
The construction phase of this project was completed in January 2010 and achieved the following goals:

- Reduced storm water flows entering the sanitary system (I/I)
- Eliminated illicit connections from the sanitary system into the storm water collection system, which included replacing 16 common manholes, rehabilitating and replacing the existing storm and sanitary sewers, and eliminating 20 illicit lateral connections
- Coordinated all improvement projects with the City of Lakeside Park in this area, which included street replacement, water line replacement and storm water improvements.

The total construction costs for this project are provided in Figure 2.6. SD1 spent over \$1.2 million in construction costs to address the issues associated with these 100 residents. Of the 100 residents, 65 elected to replace their sanitary laterals and took advantage of the newly established 50/50 cost sharing program described in Section 2.13.3.

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Figure 2.6 Van Deren Area Improvement Project Costs



SD1 installed a flow meter (FM043 as shown in Figure 2.5) downstream of the project area throughout 2009 and 2010 in order to obtain pre-construction and post-construction data. To assess the benefits of the project, the meter data was used to calibrate the model to both pre-construction (pre January 2010) and post construction (post January 2010) conditions. The model was calibrated to multiple events under both pre and post construction conditions. To assess the overall reduction in inflow and infiltration into the sanitary sewer, the rainfall from the 1970 typical year was simulated under both conditions. The volume of I/I predicted under the post-construction condition was found to be significantly less than under the pre-construction condition. In addition, predicted peak flows from this area were also found to be less. Table 2.10 shows the results of the two conditions. The improvements achieved approximately 50% reductions for both peak flow and volume.

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**Table 2.10 Impact of Van Deren Improvements on
Wet Weather Peak Flow & Volume**

Meter	2009 Calibration (Pre Rehab)		2010 Calibration (Post Rehab)		Results	
	Peak Flow (MGD)	Inflow and Infiltration Volume (MG)	Peak Flow (MGD)	Inflow and Infiltration Volume (MG)	Peak Flow Reduction (%)	Inflow and Infiltration Volume Reduction (%)
FM043	0.79	2.08	0.45	1.04	43%	50%

In addition to reducing the total treated volume of water directed to the Dry Creek Wastewater Treatment Plant by over a million gallons, this local impact on volume reduction is predicted to also reduce downstream SSO volume by approximately 20,000 gallons in the typical year at recurring SSOs 1600050 and 1600029.

City of Ft. Thomas - Vernon Lane

The Vernon Lane project area consists of approximately 270 homes in Ft. Thomas and is located in the Licking River Siphon drainage area. The project area is considered to contribute to a significant public health risk as a result of local SSOs. Because of the high priority of this area and the known high peak flows during wet weather, SD1 conducted detailed public and private smoke and dye testing in order to identify storm water derived I/I source connections to the sanitary sewer. The testing revealed a significant number of public and private sources of I/I, as shown in Figure 2.7.

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Figure 2.7 Vernon Lane SSES Findings

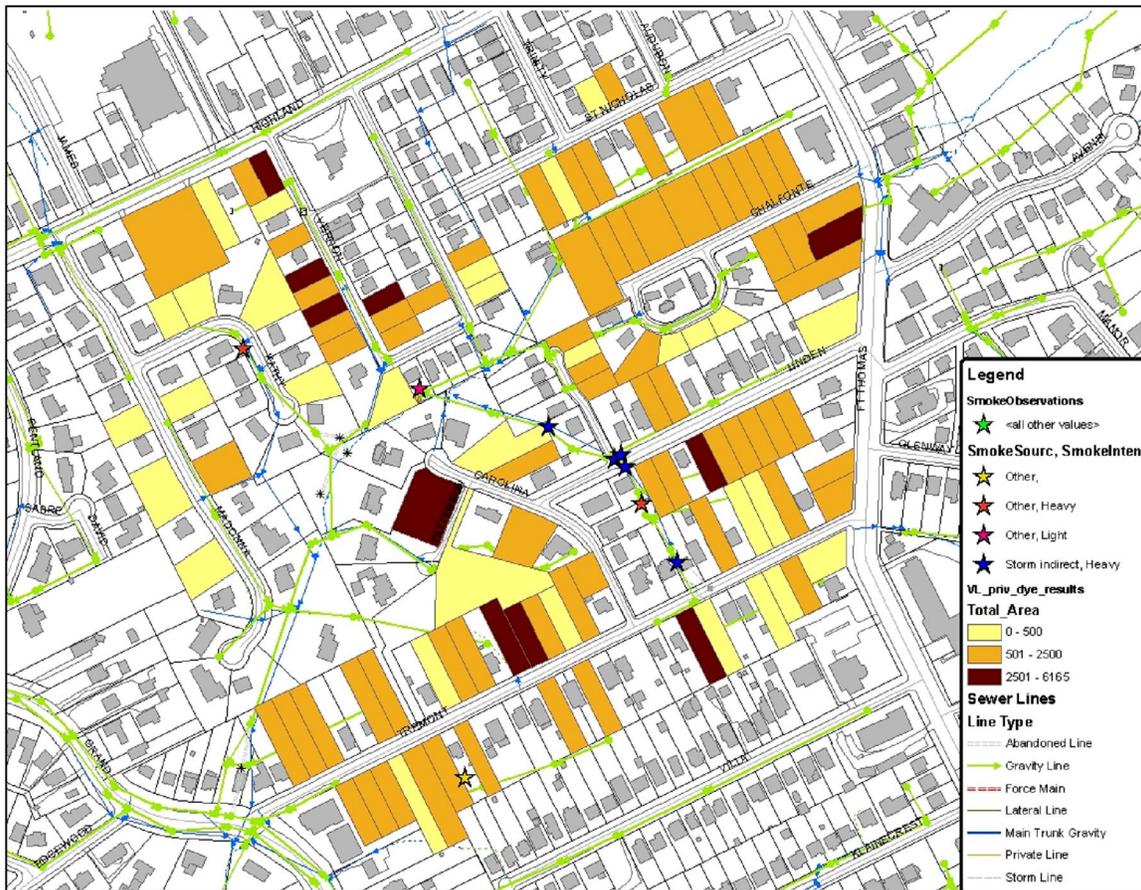


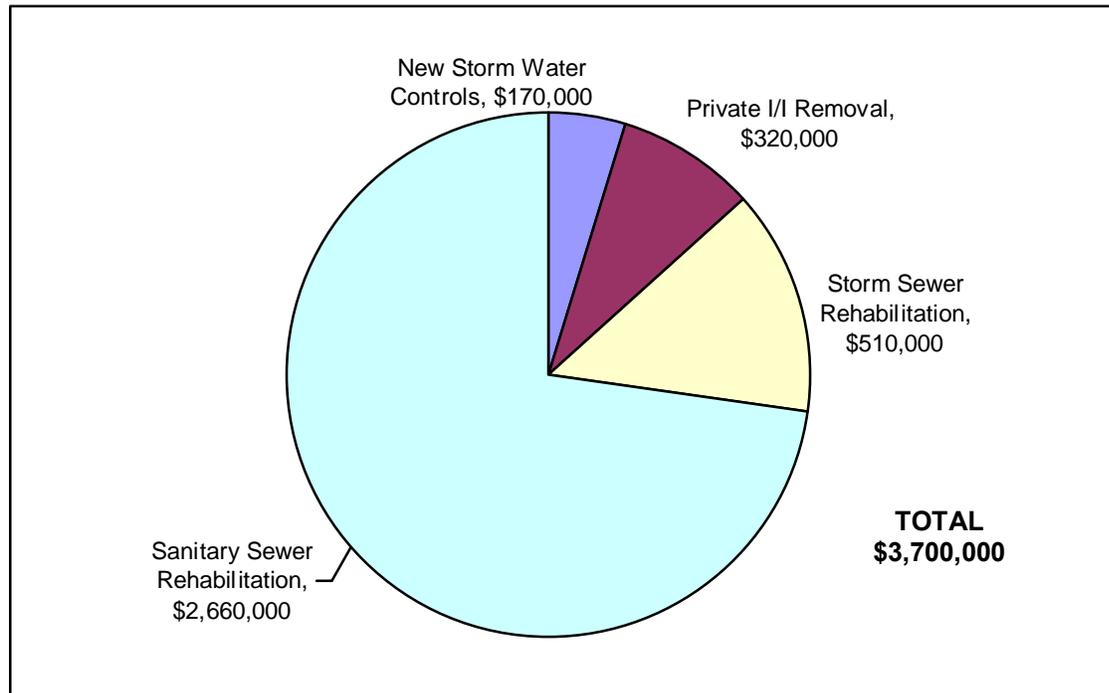
Figure 2.7 indicates properties color coded by the amount of tributary area (square feet) tied to the sanitary sewer when it rains - the darker the shade of color, the greater the amount of area that contributes storm water runoff to the sanitary sewers. The stars represent locations where indirect cross-connections between the storm and sanitary sewers were identified.

During FY 2010, SD1 finalized the improvement plan for this area. The final project design holistically addresses all sources of storm water entering the sewers and streams at the local level. The project focuses on the removal of direct storm water connections from 115 homes, rehabilitation or replacement of 3,500 linear feet of storm sewer and associated structures, and up to 5 regional-type green infrastructure installations to mitigate flooding, reduce storm water peak flows to critical in-stream flow levels to reduce erosion and hydromodification (see section 2.15 for more details), and improve storm water runoff water quality.

By eliminating 50% of the I/I in the Vernon Lane area, SD1 can eliminate 2 recurring high public health risk SSO locations and the corresponding 0.26 MG of overflow volume in a typical year. By removing I/I at the source, downstream overflows in the Three Mile Creek watershed can also be reduced by 3.3 MG in the typical year. The

project is estimated to cost \$3.7M, which saves over \$1M when compared to a traditional conveyance and treatment option. The costs of this project are provided in Figure 2.8. Work is scheduled to begin in the spring of 2011 and be complete in phases by the fall of 2014. Both pre and post-construction water quality and quantity will be monitored.

Figure 2.8 Vernon Lane Improvement Project Costs



2.13.3 Private Source I/I Removal Policy

These project locations have been identified as optimal locations for SD1 to test the effectiveness of source control through I/I removal versus conveyance and treatment to eliminate SSOs. However, in order to truly implement successful pilot projects that will assist SD1 in making future decisions about this type of source control, SD1 understands that property owners will need to participate in correcting private source I/I problems.

To encourage property owners to voluntarily repair the private systems that were determined to have high levels of I/I, SD1's Board of Directors approved the implementation of a Pilot Private Source I/I Removal Policy beginning in FY 2010. This policy allows SD1 to reimburse property owners 50% of the costs to remove the I/I, with a maximum contribution of \$2,500 per property. The property owners in the Van Deren area were the first to utilize this program during FY 2010. Because of its success, the program will continue to be offered to residents in the other project areas identified.

2.14 Training

The purpose of SD1's Training Program is to build an elite, professional, and proactive workforce capable of executing the mission and vision of SD1 in a safe, timely, and cost-effective manner. This comprehensive Training Program results in several benefits for the organization, including:

- Ensuring the safety of our employees and the community we serve
- Increasing job satisfaction, employee morale, and workforce engagement by providing opportunities for personal and professional growth
- Keeping staff up-to-date on industry trends, as well as certification and license requirements
- Maintaining the efficiency and consistency of job performance, which consequently upholds the quality of our work and yields a greater return on investment
- Meeting and exceeding the expectations of our ratepayers and governing bodies by ensuring fiscally responsible, efficient, and well-informed operations

SD1 employees are provided with a wide array of training opportunities throughout the year, including safety training, technical skills training, and soft skills training in areas such as communication and leadership. SD1 personnel received approximately 8,000 total hours of training during FY 2010. Employees may receive professional development through external courses or through SD1's formal in-house training program that is managed by Human Resources.

2.14.1 In-House Training Program

SD1's 2010 Training Calendar provided in Appendix K outlines the in-house trainings available to SD1 staff. All of the classroom instruction for the courses identified in the catalog is provided by highly qualified and trained SD1 personnel, and instruction material is made available through the training program's in-house library. The training calendar and library is updated each FY to provide revised or new training information.

In FY 2011, SD1's in-house training program will offer basic computer skills training in both typing and the use of Microsoft programs. This training is geared towards SD1's field personnel and was created to ensure the continued advancement of technology in SD1's field operations.

(Refer to Section 2.6.1 for a description of SORP training and Section 2.12.1 for a description of safety training that took place during the current reporting period.)

2.14.2 External Training

Kentucky WINS Program

SD1 continued its participation in the Kentucky WINS program that provides grant funding for customized employee training through the Kentucky Community & Technical College System. During FY 2010, SD1 was able to secure grant funds to provide pump

station maintenance personnel additional specialized job training. Personnel attended Gateway Community College and completed two courses in Motor Controls.

Many of the employees that have taken classes through this program over the last several years are close to meeting the requirements needed to obtain specialized certifications. In FY 2011, SD1 is seeking additional grant funds for those employees to take the technical classes needed to fulfill the certification requirements of their respective programs. In addition, SD1 is seeking WINS grant funds for employee course training in the following areas: project management, supervisory, leadership, customer service, and people skills.

Professional Certifications

The following employees received professional certifications during the current reporting period:

- Water Resources Project Engineer . Engineer-in-Training
- Planning & Design Project Engineer . Professional Engineering (P.E.) License and Erosion and Sediment Control Certification
- HVAC Technician - Master HVAC License and Kentucky Contractors License
- Small Plants Senior Crew Leader . Wastewater Treatment Class 2 Operator License
- Pump Station Crew Leader . Wastewater Treatment Class 3 Operator License
- Director of Treatment and Pump Operations . Wastewater Treatment Class 4 Operator License
- Pump Station Maintenance Manager . Wastewater Treatment Class 4 Operator License
- Fleet Manager . Department of Agriculture Applicators License and Certified Supervisor for Class C and Class D Inmates

2.15 Water Quality Monitoring

The purpose of the Watershed Monitoring Program is to collect and assess instream water quality, macroinvertebrate, fish and habitat data throughout the study area. This program includes dry weather baseflow monitoring in all watersheds (approximately 75 locations), and wet weather event-based and biological monitoring in major watersheds (approximately 60 locations).

During FY 2010, SD1 included a hydromodification component in its monitoring efforts. This component focuses on measuring the physical stream channel responses that are primarily attributable to land-use conversion from undeveloped to developed. The altered flow regime associated with conventional urban development (i.e. hydromodification) leads to flashier and larger flows, excessive stream erosion, and overall channel instability that can cause water quality impairments (e.g. high TSS and sedimentation/siltation) and have adverse effects on aquatic biota such as fish and macroinvertebrates. Accelerated bank erosion, channel widening, and enlargement also pose risks to adjacent public infrastructure (e.g. sewers, roads, and bridges) and private property.

This data is being used to calculate critical flow values ($Q_{critical}$) for Northern Kentucky streams. $Q_{critical}$ is the amount of flow that begins to induce impairments such as stream bank erosion and hydromodification. This factor is viewed as the link between water quality and water quantity management because the calculation of $Q_{critical}$ allows for the design of storm water runoff controls that address both issues.

Performance Monitoring

Instream water quality and overflow data collected to help characterize watersheds in SD1's service area plays an integral role in prioritizing, designing, and implementing cost-effective solutions that will reduce overflow occurrences and improve water quality in rivers and streams within SD1's service area. These data were used to create the hydraulic and water quality models that served as essential planning tools in developing SD1's Watershed Plans submitted June 30, 2009. As a second phase of the monitoring program, SD1 is currently developing performance criteria in order to measure its progress in improving water quality in relation to the base-line water quality models.

Stream Condition Index

Data collected through SD1's watershed monitoring program continues to support and refine the Stream Condition Index (SCI). During FY 2010 SD1 continued to make refinements to the index, which included stream flow and hydromodification metrics.

Source Identification Program

SD1 developed a Source Identification Program during FY 2009 to identify potential dry and wet weather sources and develop recommendations and remedies that correct the sources and reduce the impact to the waterways. SD1 chose to pilot the program in the Banklick Creek watershed in order to gain insight about its application before applying it to another watershed. SD1 conducted follow-up sampling during FY 2010 to confirm the sources identified in the field reconnaissance activities conducted in 2009 and 2010.

SECTION 3. GREASE CONTROL PROGRAM

The purpose of SD1's Grease Control Program is to prevent the introduction of fats, oils, and grease (FOG) into the sanitary sewer system thereby reducing sewer overflows, maximizing sewer capacity and decreasing sewer maintenance costs. In addition, this program is intended to increase awareness of operators of local food service establishments (FSE) and home owners about measures they can take to limit or prevent the introduction of FOG into the drains and sanitary sewer system.

For the past three years, SD1 has worked to develop and implement a formal Grease Control Program. SD1 received regulatory approval of its Grease Control Program: Proposed Phased Implementation Plan on January 8, 2008. Once complete, the newly revised Grease Control Program will include components such as ordinances, design

standards, and expanded permitting, inspection and enforcement protocols. The enhancements made under the new Grease Control Program will aid in maximizing sewer capacity and reducing sewer overflows within the collection systems.

The program is constructed through the implementation of four phases, each lasting 12 months. For a description of the tasks to be completed during each phase, refer to Appendix L. Phase 1 and Phase 2 of this newly revised program are complete, and Phase 3 is currently being implemented and tracked as part of SD1's regulatory compliance measures. The deadline for completion of all Phase 3 tasks is January 8, 2011. A description of SD1's current implementation of its program, which incorporates the tasks in Phases 1, 2 and 3, is more fully described in the following sections.

3.1 Program Management

3.1.1 Responsibility

SD1's Industrial Monitoring Group is responsible for the implementation of the Grease Control Program. To sufficiently support the implementation of this program, SD1 has allocated a full-time position to perform the required work. During FY 2010, SD1 hired a full-time employee to fulfill the staffing requirements needed to effectively implement the program.

3.1.2 Legal Authority

Sanitary Rules & Regulations

The Sanitary Rules and Regulations provide SD1 the legal authority necessary to control the sewer system and monitor the wastewaters discharged to the public wastewater treatment system under its management. This control, along with other controls affected by these Rules and Regulations, is necessary not only to conform to federal and state Environmental Protection Agency laws and regulations, but also to provide for the consistent, reliable, and efficient functioning of the SD1's wastewater collection and treatment systems.

During FY 2010, SD1 updated Articles 1 and 5 of its Sanitary Rules and Regulations to establish the appropriate legal authority and requirements needed to control the discharge of grease into the sanitary sewer and to institute a permit program. A thirty day public comment period was advertised to allow the public an opportunity to comment on the revisions. Copies of the draft revisions, along with supplemental program information, were available for review at SD1's main office, online at www.sd1.org, and at a library in each of the three counties served by SD1 from June 1, 2010 to June 30, 2010. The revisions were also read publicly on two separate occasions at SD1's June 15, 2010 and July 27, 2010 Board of Directors meetings. SD1 also sent a notice of the opportunity to provide comments to the following community groups:

- Boone, Campbell and Kenton County Schools
- Northern Kentucky Area Planning Commission
- Northern Kentucky Chamber of Commerce
- Northern Kentucky Chapter of the Kentucky Restaurant Association
- Northern Kentucky Home Builders Association
- Tri-Ed

After no public comments were received, the proposed modifications to SD1's rules and regulations were approved by SD1 Board of Directors at their July 27, 2010 meeting. Thereafter, SD1 received regulatory approval of these revisions from the Cabinet on October 12, 2010.

Enforcement Response Plan

SD1's Enforcement Response Plan (ERP) is used to determine the appropriate enforcement response to a specific violation of pretreatment requirements. The purpose of plan is to define the range of appropriate enforcement actions based on the nature and the severity of the violation and the overall degree of noncompliance. It also promotes consistent and timely use of the enforcement remedies available to SD1 by eliminating uncertainty and confusion concerning enforcement options.

SD1 updated its ERP during FY 2010 to include provisions necessary to enforce the requirements of the grease control program. These updates were approved by the Cabinet on July 19, 2010.

FOG Management Policy

During FY 2010, SD1 created a FOG Management Policy (Appendix M) to describe in greater detail the implementation of its permitting program. The policy is intended to establish clear design standards, procedures, and guidelines to regulate FSE operations, as well as the disposition of FOG wastes pumped from FSE Grease Control Equipment (GCE) during routine maintenance. The authority for this policy is contained in SD1 Rules and Regulations. Enforcement actions taken under this policy will be in accordance with SD1 ERP. FSEs shall provide facilities and institute procedures in accordance with the SD1 FOG Management Policy and/or procedures and/or guidelines as are reasonably necessary to prevent or minimize the potential for accidental discharge of FOG into the sewage collection system. This includes implementation of Best Management Practices protocols.

3.2 Permitting

Currently, all FSEs within the boundaries of SD1 must, upon request, complete a Restaurant/Food Service Grease Handling Questionnaire. SD1 then determines the need to issue a Food Service Discharge Permit along with any applicable fees. Effective January 1, 2012, SD1 will require that all new food service establishments obtain a Food Service Discharge Permit.

3.2.1 Record Keeping

SD1 Food Service Discharge Permit requires that FSE maintain a FOG Folder at the FSE facility address that must be available for periodic inspections. The folder must contain the following records at all times:

- Food Discharge Permit
- Completed interior GCE cleaning logs and cleaning schedule (including receipts from cleanings performed by outside companies)
- Copies of all receipts and hauling manifests for exterior GCE cleanings. The FSE must obtain the final disposal copy of the hauling manifest showing where the final disposal occurred.
- Copy of the contract/agreement with the GCE cleaning company/hauler.
- Specifications on all GCE being used at the facility.
- Any correspondence including past Notices of Violation from SD1.

All records shall be retained for a minimum of three years. Failure to meet any of the record keeping requirements is a violation of the Food Service Discharge Permit and SD1 Rules and Regulations.

3.2.2 Grease Control Equipment (GCE)

SD1's permit also requires that all discharges containing grease & oil pass through Grease Control Equipment (GCE) before entering the sanitary sewer. GCE refers to any equipment that removes fats, oils, and grease from wastewater such as a grease trap which is installed inside the building usually under a counter/sink or built into the floor of the kitchen area; or a grease interceptor which is usually installed outside in the ground and is much larger in size. GCE must be well-maintained and in proper operating condition at all times.

The design criteria for approved devices are defined in the FOG Management Policy and will be enforced with deadlines for installation through the revisions made to the Sanitary Rules and Regulations. The design criteria were established during FY 2010 with input from the Kentucky Division of Plumbing, Kentucky Health Department and the Cabinet. These criteria were also made available for public review during the Sanitary Rules and Regulations public comment period.

All new FSEs will be required to submit plumbing plans to SD1 to ensure that the grease control device specified for installation meets SD1's design criteria. Once installed, the grease control device must be inspected by SD1 to verify that an appropriate grease control device was installed and is operating properly. SD1 will use any and all legal remedies to enforce the use of such devices, including the Administrative and Judicial remedies set forth in SD1's Sanitary Rules and Regulation. Commonly used remedies include: notices of violation, cease and desist orders, and administrative fines.

3.2.3 Reporting Requirements

SD1 requires permitted FSEs to report proof of service or cleaning of its GCE. All documentation must be submitted to SD1 within 30 days of the actual cleaning/service.

3.3 Inspections

3.3.1 Permitting Inspections

SD1's Industrial Monitoring Department performs inspections of local FSE that may be contributing to the buildup of FOG in the collection system. During this inspection, the FSE is provided a Restaurant/Food Service Grease Handling Questionnaire that must be completed and returned to SD1 within two weeks. SD1 revised and updated this questionnaire during FY 2010. The questionnaire is used to help gain insight into the potential of FOG to enter the collection system through that particular FSE. If the potential is established, the FSE is issued a Food Service Discharge Permit. Random inspections are conducted to ensure compliance with the permit and with SD1's Rules and Regulations.

FSEs are initially inspected in known FOG problem areas where maintenance and inspection data reveal that the condition of the lines and pump stations are significantly stressed due to the buildup of FOG. In addition, FSEs are inspected when contributing wastewater to a line that is found overflowing due to a blockage caused by FOG. By looking at the collection systems in this manner, SD1 can prioritize which areas to focus on and target inspections to FSEs that have the greatest potential impact of reducing FOG.

Sewer Inspection Data

SD1 conducts FSE inspections based on current sewer inspection data, which provides specific locations of grease blockages. CCTV inspection data in gbaMS indicating a blockage of 30% or greater due to grease is integrated into a GIS data layer to visually represent the FOG problem areas across SD1's service area. Maps are created from the data layer to display the sewer lines, sewer structures, and buildings connected to the collection system in relation to the grease blockages. The maps are updated monthly with new inspection data and are reviewed to determine if new problem areas exist. If new problem areas are indicated, the FSEs in those areas are inspected. Over time, the maps will also be reviewed to ensure that pipe conditions are improving and the FOG issues are being resolved.

3.3.2 Compliance Inspections

At the end of FY 2010, SD1 had 43 permitted FSEs throughout the service area. Within one year of a permit's issue date, at least one follow-up inspection is conducted at each permitted FSE. As a result of these inspections, SD1 issued 38 Notices of Violation in response to non-compliance with the Food Service Discharge Permit. The three main areas of FSE non-compliance during FY 2010 were: (1) not properly maintaining the

required FOG folder, (2) not cleaning grease traps as often as the permit requires, and (3) failing to return the Permit Application/Questionnaire and associated fees.

3.4 Grease Trap Waste Disposal

All individuals or companies that haul waste to the Dry Creek Wastewater Treatment Plant must apply for and obtain a Domestic Holding Tank Waste Hauler Discharge Permit. Permits are issued on an annual basis and provisions of the permit must be adhered to at all times. Mobile waste haulers disposing grease trap waste at the plant are required to submit a Domestic Holding Tank Waste Hauler Manifest, which provides a detailed description of each load on their truck. During FY 2010, SD1 created a new hauled waste manifest to ensure that all new tracking and documentation requirements are fulfilled. To supplement the new manifest a new hauled waste questionnaire was created that will be issued annually to the waste haulers. All FSEs in SD1 jurisdiction shall have a SD1 certified grease waste hauler complete a grease interceptor certification annually.

SD1 monitors the method and location of disposal of grease removed from accepted grease control devices through the grease hauler manifest. The information is stored in LINKO FOG software. The amount of grease hauled to and disposed of at the Dry Creek Wastewater Treatment plant since FY 2008 is provided in Table 3.1.

**Table 3.1 Grease Disposed at Dry Creek Wastewater Treatment Plant
(FY 2008 through FY 2010)**

Fiscal Year	Gallons of Grease
2008	555,833
2009	43,649
2010	108,300

There has been a significant reduction in the amount of grease since FY 2008 because SD1 is no longer receiving grease from Schwan's Global Supply Chain; however, SD1 anticipates that this number will increase as additional FSEs become permitted.

3.5 FOG Education

3.5.1 FSE Compliance Workshop

SD1 has created appropriate training materials to educate grease generators and their employees on best management practices, permit requirements, and applicable rules and regulations. A representative from all permitted FSEs is required to attend a training workshop.

SD1's current FSE compliance training workshop is being coordinated through the Northern Kentucky Health Department's monthly Food Service Managers Workshop, which is a required program for all FSEs in Boone, Campbell and Kenton counties. This

coordination provides a cost-effective and efficient way for SD1 to ensure that all FSEs, even those not currently permitted, are being trained.

SD1 is provided a monthly summary of the attendees who attended the training and the number of educational pamphlets and brochures that were distributed to each attendee. Between February 2010 and October 2010, approximately 747 food service managers (including representatives from FSEs that are not currently permitted) attended the workshop and received over 800 brochures and pamphlets.

3.5.2 General Education

SD1 uses various communication pieces throughout the year to inform and educate private residences on the harmful effects of FOG in sewer lines and the proper grease handling techniques that can be used to minimize the release of FOG into the collection system. This information is distributed through various channels such as: direct mailings, bill inserts, SD1's website, promotional product giveaways, and community newsletters and newspapers. Using the data provided by sewer inspections, SD1 will focus its public education efforts primarily in areas that are showing signs of grease problems and will apply an appropriate communication strategy to best fit the situation.

Residential Communication

During FY 2010, SD1 mailed approximately 2,600 letters to residents in areas that have experienced an overflow or building backup caused by a build-up of grease. The letter alerts residents that an overflow or building backup occurred, educates the residents about the effects of fats, oils, and grease (FOG) on the collection system, and provides proper disposal methods.

In addition, 700 letters were distributed to residents in areas where sewer inspection data revealed a 70% blockage due to grease. This letter specifically warns residents of the potential of a sewer overflow or building backup, as well as other risks associated with the improper disposal of FOG. It also educates the residents about what they can do to reduce the amount of FOG entering the collection system and provides the proper disposal methods.

Website

SD1's website has been working to expand the grease control section of its website to include additional information for the public, FSEs, and sludge haulers. The web page material has been compiled and is currently being loaded onto the website. SD1 anticipates that this will be complete by the end of December 2010.

3.6 Performance Indicators

Table 3.2 provides a summary of the performance indicators that SD1 is tracking in relation to its implementation of a formal Grease Control Program. Now that there are three full years of data for this program SD1 can begin analyzing the performance information. Specifically, SD1 is determining if there is any correlation between the

reduction in the feet of lines on the permanent PM cleaning list and the increase in the number of SSOs and building backups, or if there are other influences/factors that have lead to these results.

Table 3.2 Grease Control Program Performance Indicators

Performance Indicator	FY 2008	FY 2009	FY 2010
Feet of Line on Current PM Cleaning List due to Grease ¹	82,000	4,326	4,326
Number of SSOs due to Grease	4	17	10
Number of Building Backups due to Grease (Reported through Trouble Calls)	2	5	7

SECTION 4. PUMP STATION BACKUP POWER UPDATES

SD1 received regulatory approval of the Pump Station Operation Plan for Backup Power on May 14, 2008 and has made significant progress assessing and implementing backup power solutions throughout the service area. For a detailed update on the current progress of this program, refer to Appendix N.

SECTION 5. SELF-ASSESSMENT PROGRAM UPDATES

SD1 performed an extensive self-assessment of each CMOM program in mid-2007, involving approximately 75 employees in a series of interviews and team planning workshops. During this process, SD1 employees identified nearly 100 improvements to collection system activities that would aid in more effectively achieving regulatory compliance and reducing SSO and CSO occurrences throughout the service area. SD1's progress in completing six remaining tasks during FY 2010 is provided in Table 5.1.

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Table 5.1 Status of Remaining CMOM Recommended Improvements

CMOM Program	I.D.	Task	Current Status
Acquisition Considerations	N/A	Assess the use of gbaMS for inputting new construction inspection reports and applicable photos.	Photos are being saved in gbaMS; however, the best place for storing inspections reports is still being determined.
IMS	IMS-6	<ol style="list-style-type: none"> 1. Assess the use of the Inspection module in gbaMS for new construction inspections. 2. Begin utilizing the Pump Station Inspection module in gbaMS for pump station inspections. 	<ol style="list-style-type: none"> 1. See Acquisition Considerations task update. 2. Task Complete.
System Mapping	SM-2	Develop an SOP to be submitted to developers and contractors for obtaining proposed digital files for new construction and capital improvement projects and updated as-builts once construction is complete.	Task Complete.
Engineering	EN-2	Upload technical specifications to SD1's website.	SD1 is currently updating its sanitary sewer specifications. The update will be completed in FY 2011 and the specs will then be uploaded to the website. Persons interested in obtaining the current specifications can receive them electronically upon request.
Pump Station Operations	PSO-4	Begin using the Pump Station Inspection module in gbaMS to record and track pump station inspections.	Task Complete.

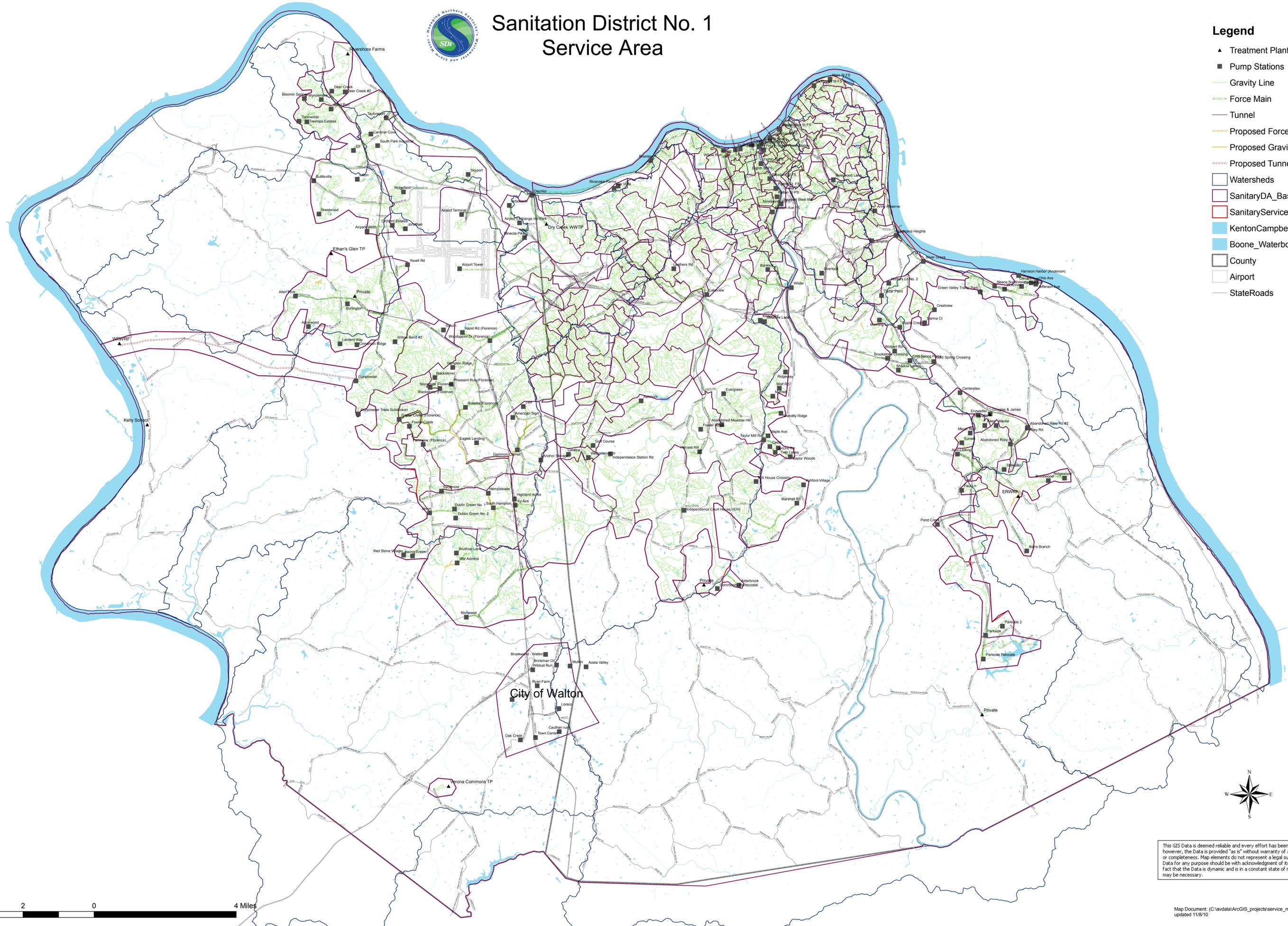
APPENDIX A:
Map of Service Area



Sanitation District No. 1 Service Area

Legend

- ▲ Treatment Plants
- Pump Stations
- Gravity Line
- Force Main
- Tunnel
- Proposed Force Main
- Proposed Gravity Line
- Proposed Tunnel
- Watersheds
- SanitaryDA_Basin
- SanitaryServiceArea
- KentonCampbell_Waterbodies
- Boone_Waterbodies
- County
- Airport
- StateRoads



This GIS Data is deemed reliable and every effort has been made to ensure accuracy; however, the Data is provided "as is" without warranty of accuracy, timeliness, reliability or completeness. Map elements do not represent a legal survey of the land. Use of this Data for any purpose should be with acknowledgment of its limitations, including the fact that the Data is dynamic and is in a constant state of maintenance. Field investigation may be necessary.



APPENDIX B:
Flow Monitoring Locations

C-MOM Meter Classification Fiscal Year 2010

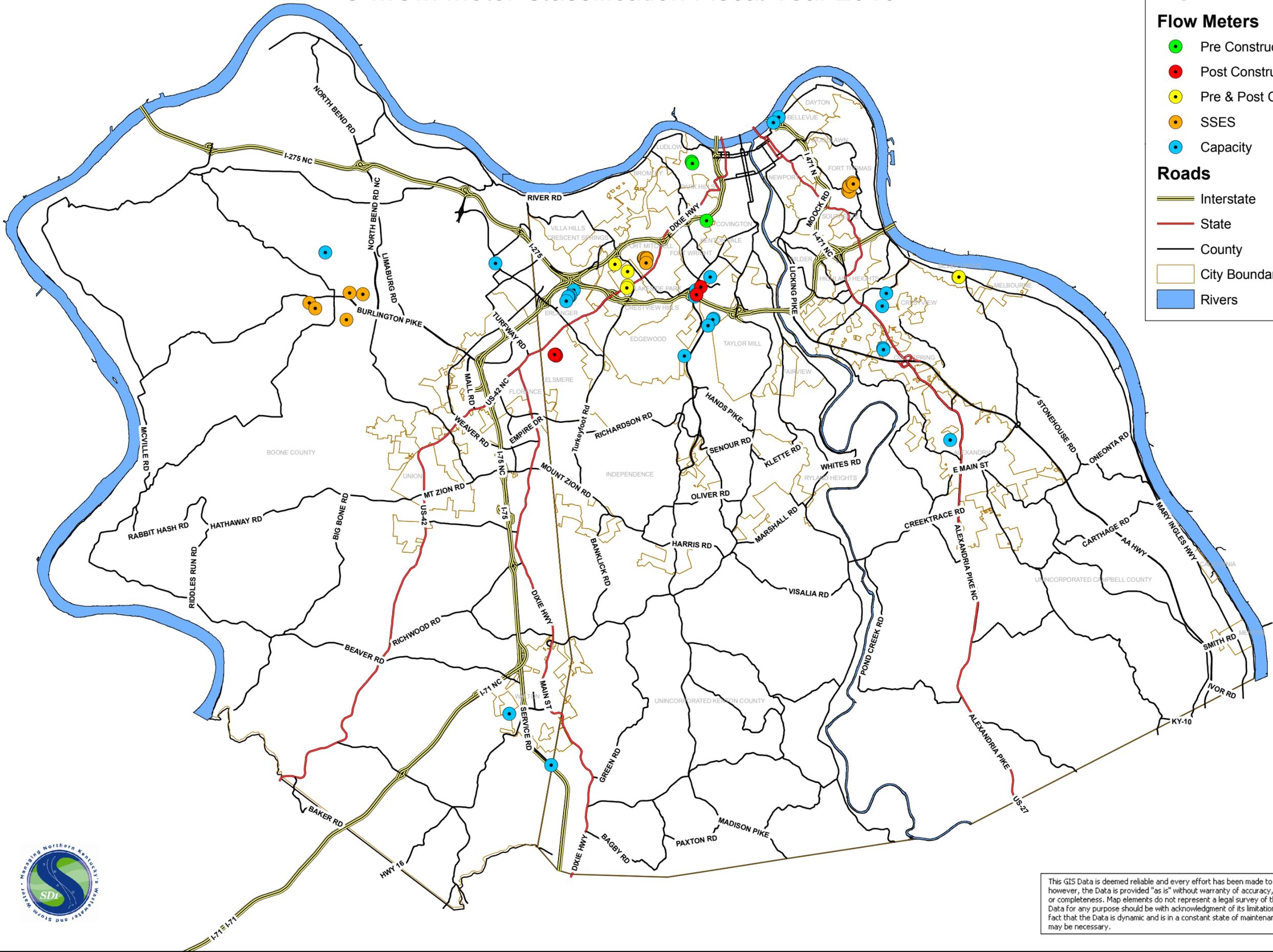
Legend

Flow Meters

- Pre Construction
- Post Construction
- Pre & Post Construction
- SSES
- Capacity

Roads

- Interstate
- State
- County
- City Boundary
- Rivers



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APPENDIX C:

FY 2010 Example Educational Publications

SD1 Offers Grant Program

As part of its federal court order with the U.S. EPA and the Commonwealth of Kentucky, SD1 has developed a program to reimburse qualified homeowners for a portion of the cost of certain sanitary sewer improvement projects. Qualifying projects include the repair or replacement of failing sanitary service laterals and the installation of new sanitary service connections to SD1 sewer mains. Routine operation and maintenance projects such as root-cutting or cleaning are not included in this program.

Eligibility is determined by household income which is defined as the gross income of all household

members, except income earned by dependent minors younger than 18 years of age. Households with incomes at or below the low income level as established by the U.S. Department of Housing and Urban Development (HUD) are eligible to apply for funding through this program. Proof of income documentation must be included with the project application. Approved homeowners may be eligible to receive grants from \$3,000 to \$5,000 towards such projects, depending on their income level.

For more information regarding this program or to download an application, please visit us on the web at www.sd1.org.



Private sewer lateral repairs can be costly. Contact SD1 to find out if you qualify for assistance.

Consider Basement Back-Up Insurance



Basement back-ups can cause property damage as well as health risks.

Sewer service laterals are sewer pipes that connect a building's plumbing to the public sewer system. Homeowners are responsible for maintaining the sewer service lateral(s) on their property. Broken laterals can allow tree roots or debris into the pipe, which may cause blockages, building backups or overflows in the environment.

When a backup occurs, clean-up costs can range anywhere from \$100

to \$20,000. Back-up insurance is available, but is not typically included in a standard homeowner's policy. The average homeowner can get \$10,000 worth of sewer backup insurance for as low as \$50 per year. This amount will typically cover a backup whether it is caused by a private lateral or a main sewer line. Check with your insurance provider and consider adding basement back-up insurance to your policy today!

Pick Up Your SD1 "Live a Little Greener" Calendar

Are you interested in learning about the little things you can do to protect the environment? As part of our educational initiatives, SD1 is offering a 12-month desk calendar. Each month provides information on a different environmental topic as well as a tip for something you can do at home to help make Northern Kentucky a little greener.

January's tip reminds us that excess salts used for deicing can build up in the soil, preventing plants from absorbing moisture and nutrients.

They can also leach heavy metals, which eventually make their way into water supplies.

When treating your pavement after the next snow or ice storm, physically remove as much of the snow and ice as possible. If you have to apply salt, look for environmentally friendly brands and remember that a little goes a long way!

For more information and tips, pick up a calendar at SD1's main office while supplies last.

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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Billing Changes

In an effort to better serve our customers, SD1 is switching our residential customers from quarterly to monthly billing. We believe this change will make budgeting more manageable and may help alleviate some of the financial burden placed on our customers.

Residential wastewater bills are now being based on water consumed during the winter months (October 1 through April 30). Basing customers' bills on their winter water usage allows SD1 to more accurately bill for the water that actually enters the sanitary sewer system.

Northern Kentucky's sewer system is aging and deteriorating. Over the next five years, SD1 anticipates investing more than \$400 million to rehabilitate the existing wastewater and storm water collection systems, reduce sewage overflows and meet the requirements set forth in SD1's legal settlement with the U.S. Environmental Protection Agency.

Due to these increasing infrastructure needs and the lack of available federal funding, 15% rate



The switch from quarterly to monthly billing should help alleviate some of the financial burden placed on SD1 customers.

adjustments have been approved for the next two years. It is anticipated that additional rate adjustments will also be necessary in the future; however, SD1 will continue to look for ways to minimize costs and will be persistent in seeking state and federal funding to help minimize the impact on our customers.

Green City Award Winners Announced

In conjunction with the rain barrel program started by SD1 in 2009, a competition was launched between the cities in SD1's storm water service area. The city that purchased the most rain barrels would be awarded the 2009 "Green City Award."

In April, the cities of Union and Independence were announced as the winners. The residents in these cities tied in purchasing more rain barrels than

any of the other cities in SD1's storm water service area.

SD1 customers will still be able to purchase "Raintainers" while supplies last. For more information visit www.sd1.org/rainbarrels or call SD1's Storm Water Hotline at 859/578-6745.

For more information visit www.sd1.org/rainbarrels or call SD1's Storm Water Hotline at 859-578-6745.

Meet the Board

SD1 is governed by an eight member citizen Board of Directors. These public servants are dedicated to protecting our water resources, safeguarding public health and enhancing the quality of life we enjoy in Northern Kentucky. Their diverse set of talents, skills, experiences and interests provide SD1 with steadfast leadership and guidance.

Board members are appointed by the Judges Executive of each county within SD1's service area. Representation on the Board is based on county population. Therefore, Kenton County holds four seats and Boone and Campbell Counties hold two seats each. The Board is responsible for adopting rules and regulations, providing fiscal oversight through the approval of financial statements, budgets and contracts, and ensuring that our customers' needs and interests are represented. Current Board members include: Robert N. Elliston, President and John A. Hill, Jr., Secretary, representing Boone County; Frances Reitman, Vice President and David K. Noran representing Campbell County; and Robert Rothert, Treasurer, Jan Steinman, Charles "Chip" Tappan, and Justin "Jay" Weber representing Kenton County.



Frances "Fran" Reitman has served on the Board since January 2009 and was appointed to the position of Vice President in July 2009. She, along with her husband Randy, currently owns and operates Reitman Auto Parts & Sales in Melbourne, KY.



David K. Noran has served on the Board since January 2003 and has served as both President and Treasurer. He is the president and principal engineer of Cardinal Engineering Corporation.

The Board of Directors meets regularly on the third Tuesday of every month at SD1's main office and all meetings are open to the public. To see the Board's full meeting schedule, visit the calendar of events page on SD1's website at <http://www.sd1.org/events/events.asp>.

SD1



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Hours of Operation:
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Governor Beshear Signs Affordability Legislation



Kentucky legislators and community representatives witness the signing of House Bill 504. (Photo Credit: Kentucky's Creative Services - Tourism, Arts and Heritage Cabinet)

On April 14, Kentucky Governor Steve Beshear signed House Bill 504 (HB 504) into law. This landmark legislation requires regulators to consider affordability in Clean Water Act compliance efforts for Kentucky communities and their residents.

While this law does not negate the need for future rate increases, it does require the Kentucky Division of Water (KDOW) to consider the costs of infrastructure improvement projects and the maximization of environmental benefits when negotiating and implementing

improvement plans with local communities and U.S. EPA Region 4.

One way that HB 504 addresses the affordability issue is requiring KDOW to consider extending the time required for a sewer utility to make infrastructure improvements, which also would help make compliance with the Clean Water Act more affordable. In addition, the bill supports the use of innovative approaches such as "green" technology to improve water quality, similar to the approach that SD1 is taking in Northern Kentucky, as another way to make these improvements more affordable.



Catch Some Rain

In February 2009, SD1 launched its pilot rain barrel program. Rain barrels collect and store rainwater from rooftops

for use in dry weather to give thirsty gardens, flowers and trees a drink. They help keep excess storm water out of the sewer system and help prevent rain from picking up pollution and carrying it to the nearest body of water.

SD1 customers will still be able to purchase "Raintainers" while supplies last. The "Raintainer" is a 55-gallon rain barrel that has an aesthetically pleasing appearance and includes a connection for a hose, making it possible to draw water from the barrel. The lid of the "Raintainer" can be used as a self-watering planter, and can also be easily removed, making cleaning the inside of the barrel simple.

For more information visit www.sd1.org/rainbarrels or call SD1's Storm Water Hotline at 859/578-6745.

SD1 Honors "Protecting the Environment Award" Recipients

The 2010 Protecting the Environment Award ceremony was held on June 29 at Twenhofel Middle School. The award ceremony recognized three scout troops, six teachers and three individual students who have gone above and beyond to protect the environment and water resources in Northern Kentucky.

For the second year in a row, the \$2,500 in cash prizes was sponsored by Walmart (Ft. Wright, KY). Additional event needs and prizes were donated by the following partners: John R. Green Company (Covington, KY), the Kenton County School District (Ft. Wright, KY), Kroger (Erlanger, KY), Meijer (Florence, KY), Natorp's Garden Stores (Florence, KY), Panera Bread (Crestview Hills, KY) and the WAVE

Foundation at the Newport Aquarium (Newport, KY).

The three scout troops were awarded between \$300 and \$500 each to complete projects with an emphasis on education and environmental service during the 2010-2011 school year. Additionally, six teachers were each awarded \$200 mini-grants to purchase supplies for teaching water-related topics to their classes next school year and three individual students were recognized for completing a spring-time pond and shoreline clean-up in Hebron, KY.

SD1 has hosted the Protecting the Environment Award program since 2003. The purpose of the program is to reward local individuals and groups involved in protecting the environment and Northern Kentucky's water resources.



(From left to right) Christopher Sanders, Kevin Sanders and William Sanders, all students at Sanders Home School, pose for a photo with SD1's mascot Splash McClean after being honored with the "Protecting the Environment Award."

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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APPENDIX D:

Compliance Program FY 2010 Violations Summary Report

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Accidental Discharge of Un-pretreated wastewater - On 9-30-09 approximately 580 gallons of un-treated wastewater was accidentally discharged to the sanitary sewer system. This discharge occurred because a valve was left in the open position.	NC-O	09/30/09	W	10/06/09	Written Notice of Violation (NOV)	\$0.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
pH spike below 5.	NC-P	03/09/10	V	04/05/10	Verbal Warning	\$0.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Oil and Grease(Hydrocarbons) =1900 mg/L	NC-P	09/21/09	W	09/21/09	Written Notice of Violation (NOV)	\$0.00

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
pH Violation	NC-P	09/21/09	W	09/21/09	Written Notice of Violation (NOV)	\$0.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
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Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
High copper value was detected on 4/28/10. The averaged result of two screens of this sample is 57.3 mg/L.	NC-P	04/28/10	WF	07/20/10	Written Notice of Violation (NOV) and fine.	\$500.00
<p>Elevated copper levels were also detected in samples collected on 5/12/10 and 5/14/10. Due to a lab error, results could not be obtained for these samples, however, an initial screen exceeded the calibration limits of our instrument. Detection limits at will typically show results below 25 mg/L, so we can we reasonably sure that copper levels for these two samples were well above the allowable limit of 5 mg/L.</p> <p>Because we did not obtain a specific result, this violation will not pertain to samples collected on 5/12/10 or 5/14/10. This violation is being issued for the sample collected 4/28/10.</p>						

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
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Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
The pH at your facility had numerous spikes below the SD1 limit of 5.0. See attached graph and also refer to SD1 Rules and Regulations on pH for the Dry Creek Wastewater Treatment Plant.	NC-P	10/06/09	W	11/11/09	Written Notice of Violation (NOV)	\$0.00
Non-Compliance Reporting Violation - Late response to NOV. A NOV response was required to be received, by the District, by 12/18/2009. To date no response has been received.	NC-R	12/29/09	WF	12/29/09	Written Notice of Violation (NOV) and fine.	\$500.00
The pH at your facility had numerous spikes below the SD1 limit of 5.0. See attached graph and also refer to SD1 Rules and Regulations on pH for the Dry Creek Wastewater Treatment Plant.	NC-P	06/03/10	W	06/03/10	Written Notice of Violation (NOV)	\$0.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
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Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
pH excursion: pH fell below 6.0 for 5 hrs.	NC-P	12/03/09	V	12/16/09	Verbal Warning	\$0.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
pH excursion- pH in mixing tank fell below 6.0 for 2.5 hrs. at one point reaching 5.3.	NC-P	11/04/09	V	11/04/09	Verbal Warning	\$0.00

Ford explained that a new employee had dumped excessive amounts of chocolate(~200lbs) down the drain. He said that chocolate is normally cleaned out from line and removed in bins. This material collected on the pH probe. NaOH was flowing, but due to the probe being covered in chocolate it was rendered virtually non-functional until it was cleaned and recalibrated.

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Oil & Grease, Hydrocarbons TRC Daily Limit was exceeded. The Result was 99.8 mg/L while the Daily Limit was 50 mg/L. The Violation occurred for Sample 'Self Monitoring' on the Sample Date of '1/25/2010' and for Monitoring Point	NC-P	01/25/10	W	03/01/10	Written Notice of Violation (NOV)	\$0.00
Oil & Grease, Hydrocarbons Daily Limit was exceeded. The Result was 57.7 mg/L while the Daily Limit was 50 mg/L. The Violation occurred for Sample 'Self Monitoring' on the Sample Date of '1/27/2010' and for Monitoring Point 'End of Pretreatment'.	NC-P	01/27/10	W	03/01/10	Written Notice of Violation (NOV)	\$0.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
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Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
The pH fell outside the Districts limits of 6.0 to 10.0. The pH violations were recorded below 5.0, as well as, periods of greater than one hour between 5 and 6, which are a violation of SD1 Rules and Regulations. (Refer to SD1 Rules and Regulations on pH for the Dry Creek Wastewater Treatment Plant).	NC-P	11/12/09	W	11/12/09	Written Notice of Violation (NOV)	\$0.00
The pH fell outside the Districts limits of 6.0 to 10.0. The pH violations were recorded below 5.0, as well as, periods of greater than one hour between 5 and 6, which are a violation of SD1 Rules and Regulations. (Refer to SD1 Rules and Regulations on pH for the Dry Creek Wastewater Treatment Plant).	NC-P	04/02/10	W	04/27/10	Written Notice of Violation (NOV)	\$0.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
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Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Self monitoring on 5/3/10 showed a discharge concentration of 2.90 mg/L, the daily maximum limit for zinc is 2.61	NC-P	05/03/10	W	06/03/10	Written Notice of Violation for 2 zinc daily max. limit violations found during 2 separate self monitoring samplings in May 2010.	\$0.00
Self monitoring on 5/19/10 showed a discharge concentration of 3.46 mg/L, the daily maximum limit for Zinc is 2.61 mg/L.	NC-P	05/19/10	W	06/03/10	Written Notice of Violation for 2 zinc daily max. limit violations found during 2 separate self monitoring samplings in May 2010.	\$0.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
pH violation - The pH fell below the SD1 limit of 5.0 SU (see attached graph and also refer to the SD1 Rules and Regulations on pH for the Dry Creek Wastewater Treatment Plant).	NC-P	05/20/10	W	05/20/10	Written Notice of Violation (NOV)	\$0.00

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
1 pH spike below 5.0.	NC-P	08/27/09	V	09/29/09	Verbal Warning	\$0.00
					Told Steve that he needs to find the problem of the quick spike and make sure it is fixed because if the next sampling event shows any type of pH violations then they will get a written NOV. This is due to them having a verbal NOV for pH (on the high end) the first half of 2009 and now another verbal NOV for pH (now on the low end) the second half of 2009.	

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Non-compliance parameter violation	NC-P	07/23/09	W	08/04/09	Written Notice of Violation (NOV)	\$0.00
ph Spike below 5	NC-P	03/11/10	V	04/05/10	Verbal Warning	\$0.00

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
An employee of Sara Lee turned off SD1 sampler during a sampling event occurring on October 4, 2009.	NC-O	10/04/09	W	10/15/09	Written Notice of Violation (NOV). SD1 sampler was turned off by an employee.	\$0.00
Oil & Grease, Total TRC Non-Compliance. Daily Limit was exceeded. The Concentration Result was 160 mg/L while the Concentration Daily Limit was 100 mg/L. The Violation occurred for Sample 'AB38948' on the Sample Date of '10/6/2009 10:30:00 AM' and for Monitoring Point 'Sampling Shack'.	NC-P	10/06/09	W	11/11/09	Written Notice of Violation (NOV)	\$0.00
The composite sample AB38947 had a chloride concentration of 2060 mg/L and the daily maximum chloride limit is 2000 mg/L.	NC-P	10/06/09	W	10/15/09	Written Notice of Violation (NOV) The composite sample AB38947 had a chloride concentration of 2060 mg/L and the daily maximum chloride limit is 2000 mg/L.	\$0.00

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

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Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Oil & Grease, Total Non-Compliance. Daily Limit was exceeded. The Concentration Result was 122 mg/L while the Concentration Daily Limit was 100 mg/L. The Violation occurred for Sample 'AB39017' on the Sample Date of '10/7/2009 11:00:00 AM' and for Monitoring Point 'Sampling Shack'.	NC-P	10/07/09	W	11/11/09	Written Notice of Violation (NOV)	\$0.00
			W	11/11/09	Written Notice of Violation (NOV)	\$0.00
Oil & Grease, Total TRC Non-Compliance. Daily Limit was exceeded. The Concentration Result was 153 mg/L while the Concentration Daily Limit was 100 mg/L. The Violation occurred for Sample 'AB39085' on the Sample Date of '10/8/2009 10:00:00 AM' and for Monitoring Point 'Sampling Shack'.	NC-P	10/08/09	W	11/11/09	Written Notice of Violation (NOV)	\$0.00
			W	11/11/09	Written Notice of Violation (NOV)	\$0.00
Chlorides TRC Daily Limit was exceeded. The Result was 2500 mg/L while the Daily Limit was 2000 mg/L. The Violation occurred for Sample 'Self Monitoring' on the Sample Date of '10/27/2009' and for Monitoring Point 'Sampling Shack'.	NC-P	10/27/09	W	11/04/09	Written Notice of Violation (NOV). Sara Lee called to report a high chloride of 2500 for 10/27/09 from there self monitoring.	\$0.00

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Chlorides Non-Compliance. Daily Limit was exceeded. The Concentration Result was 2335 mg/L while the Concentration Daily Limit was 2000 mg/L. The Violation occurred for Sample 'AB42467' on the Sample Date of '11/24/2009 8:30:00 AM' sampled at the manhole.	NC-P	11/24/09	WF	12/22/09	Written Notice of Violation (NOV) and fine. Written Notice of Violation (NOV) High chloride concentration on 11/24/09 of 2335 mg/L AB42467.	\$500.00
High pH between 10.0 and 11.0 for a 2 hour period (3AM-5AM). They called it into SD1 on the same day. First pH excursion in a long time so gave Verbal NOV.	NC-P	01/06/10	V	01/06/10	Verbal Warning for pH violation between 10.0 and 11.0 for 2 hours (3AM -5AM). Called Jonathan Zimmerman	\$0.00
Oil & Grease, Total Daily Limit was exceeded. The Result was 104.5 mg/L while the Daily Limit was 100 mg/L. The Violation occurred for Sample 'Self Monitoring' on the Sample Date of '1/20/2010' and for Monitoring Point 'Sampling Shack'.	NC-P	01/20/10	W	02/18/10	Written Notice of Violation (NOV)	\$0.00

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Oil & Grease, Total TRC Daily Limit was exceeded. The Result was 165 mg/L while the Daily Limit was 100 mg/L. The Violation occurred for Sample 'Self Monitoring' on the Sample Date of '2/10/2010' and for Monitoring Point 'Sampling Shack'.	NC-P	02/10/10	WF	02/25/10	Written Notice of Violation (NOV) and fine.	\$500.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
The pH of your wastewater was recorded below 5.0, which is a violation of the District's Rules and Regulations and your Industrial Wastewater Discharge Permit. (see the attached graph and also refer to the Sanitation District No. 1 Rules and Regulations on pH for the Dry Creek Wastewater Treatment Plant).	NC-P	08/19/09	W	08/24/09	Written Notice of Violation (NOV)	\$0.00

Sanitation District # 1
 Industrial Pretreatment Program
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All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Recent sampling showed multiple pH excursions.	NC-P	10/05/09	W	11/02/09	Written Notice of Violation (NOV)	\$0.00
The wastewater pH pretreatment system was being bypassed for repairs without notification to Sanitation District No. 1 per your wastewater discharge permit as stated on page 6 under Reporting Requirements, C. Notice Of Pretreatment Bypassing.	NC-O	10/05/09	W	11/02/09	Written Notice of Violation (NOV). The wastewater pH pretreatment system was being bypassed for repairs without notification to Sanitation District No. 1 per your wastewater discharge permit as stated on page 6 under Reporting Requirements, C. Notice Of Pretreatment Bypassing.	\$0.00
A plastic bag of lettuce and other plastic debris and seals were found wrapped around monitoring equipment that SD1 had installed in the sanitary sewer line that services Club Chef. These materials found in the sanitary sewer system are considered a nuisance and not permissible to be discharged to the sanitary sewer. Refer to SD1 Rules & Regulations, Article5, Section 501(1)(B)((17)).	NC-O	11/12/09	W	11/18/09	Written Notice of Violation (NOV)	\$0.00
Effluent pH exceeded permitted limits on multiple occasions during sampling conducted from 5/10/10 to 5/21/10.	NC-P	06/01/10	WF	06/01/10	Written Notice of Violation (NOV) and fine.	\$500.00

Sanitation District # 1
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 Violations Summary Report

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 Event Category that Contain Violation
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Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Failure to Monitor pH- On 5/28/10 SD1 was made aware that Club Chef has not been monitoring pH levels of it's effluent discharged to the sanitary sewer system.	NC-O	06/01/10	WF	06/01/10	Written Notice of Violation (NOV) and fine.	\$500.00
Monitoring equipment was not maintained/calibrated to ensure effective pretreatment as required in your industrial wastewater permit.	NC-O	06/29/10	WF	08/03/10	Written Notice of Violation (NOV) and fine.	\$1,000.00

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Event not completed on time Non-Compliance	SNC-R	07/15/09	P W	08/11/09 07/15/09	Publish in local newspaper Written Notice of Violation (NOV)	\$0.00 \$0.00
Hold Time exceeded for Cyanide sample. Sample date was 8/4/09. Lab received sample on 8/21/09(17 days). Cyanide hold time is 14 days.	NC-R	09/09/09	W	09/09/09	Written Notice of Violation (NOV)	\$0.00

Sanitation District # 1
 Industrial Pretreatment Program
 Violations Summary Report

All Permits **Filter Criteria:**
 Event Category that Contain Violation
 Dates: 07-01-2009 - 06-30-2010 11:59:59 PM

Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
Non-Compliance Reporting Violation – Sampling late/not performed for 1st Quarter Self Monitoring.	NC-E	04/20/10	WF	04/30/10	Written Notice of Violation (NOV) and fine.	\$500.00

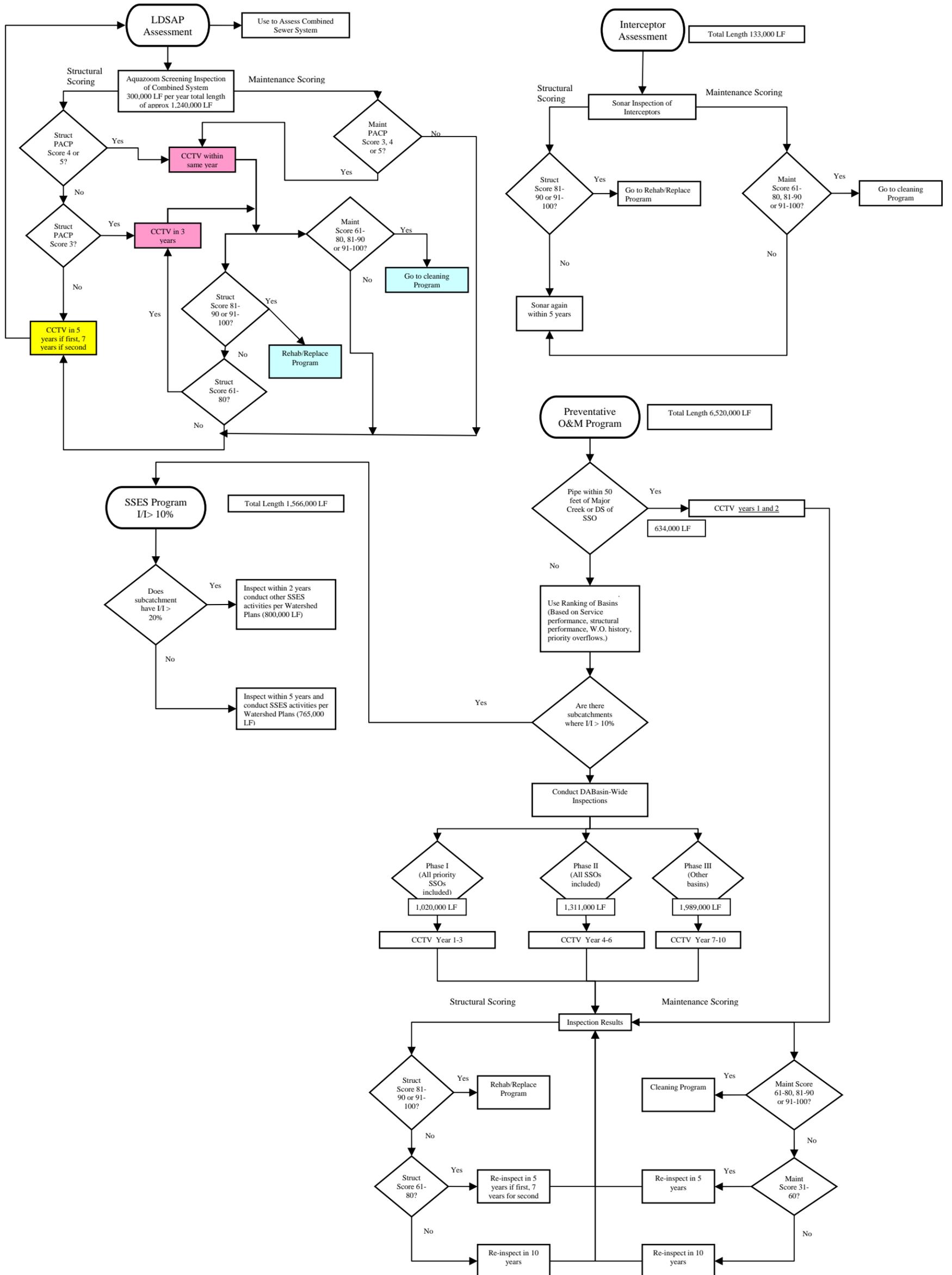
Permit:

Violation Description	Violation Type	Date of NC	Enforcement Type	Date of Enforcement	Enforcement	Penalty
The 3rd Qtr Self Monitoring report was late. Was due by 10/20/09 but rec'd 12/4/09. Issued a verbal NOV since they still have not started up discharging from the production process.	NC-R	10/21/09	V	12/23/09	Verbal Warning The 3rd Qtr Self Monitoring report was late. Was due by 10/20/09 but rec'd 12/4/09. Issued a verbal NOV since they still have not started up discharging from the production process.	\$0.00
1st Quarter 2010 Self Monitoring Report sent late.	NC-R	04/21/10	W	06/29/10	Written Notice of Violation (NOV)	\$0.00

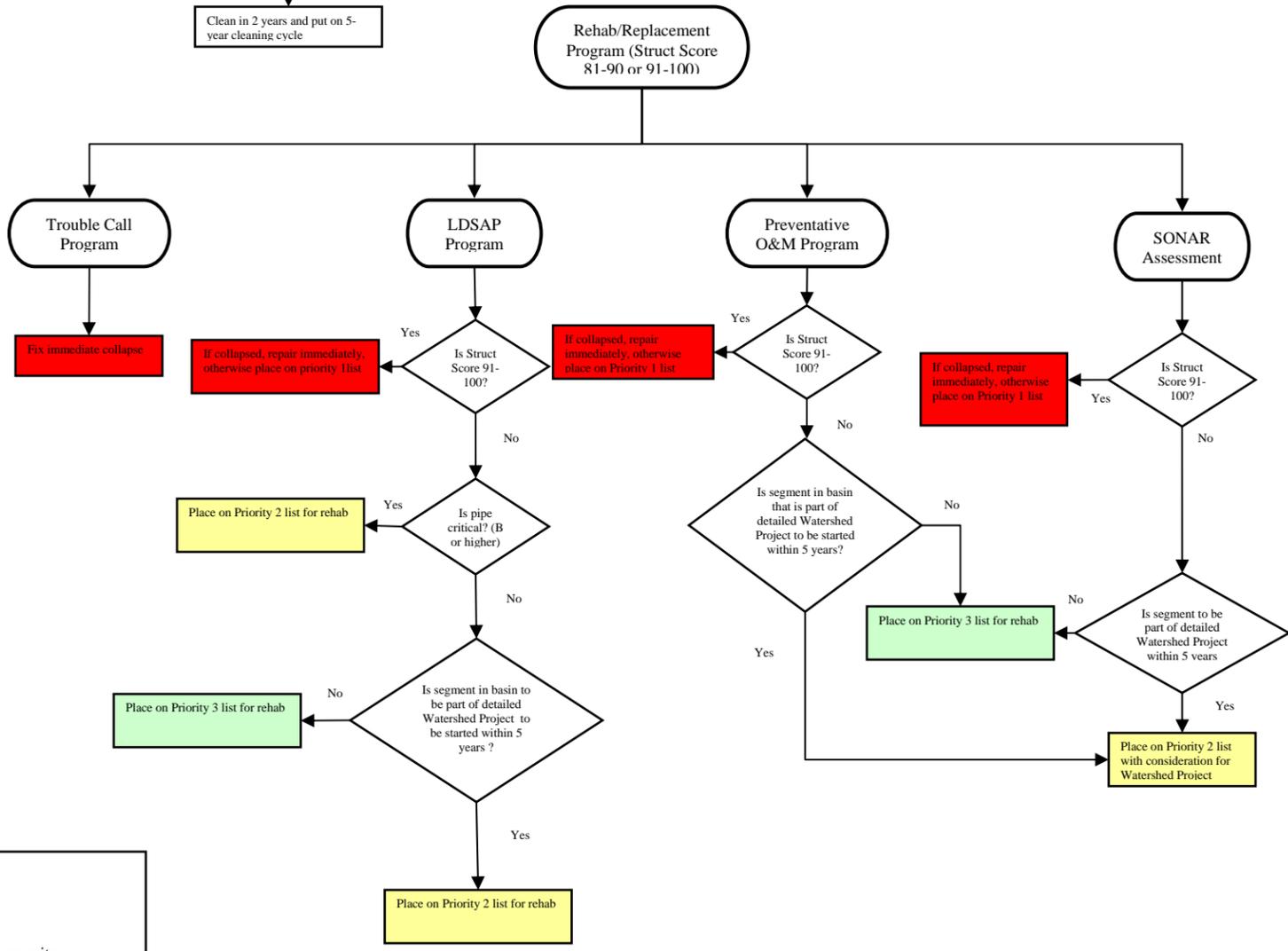
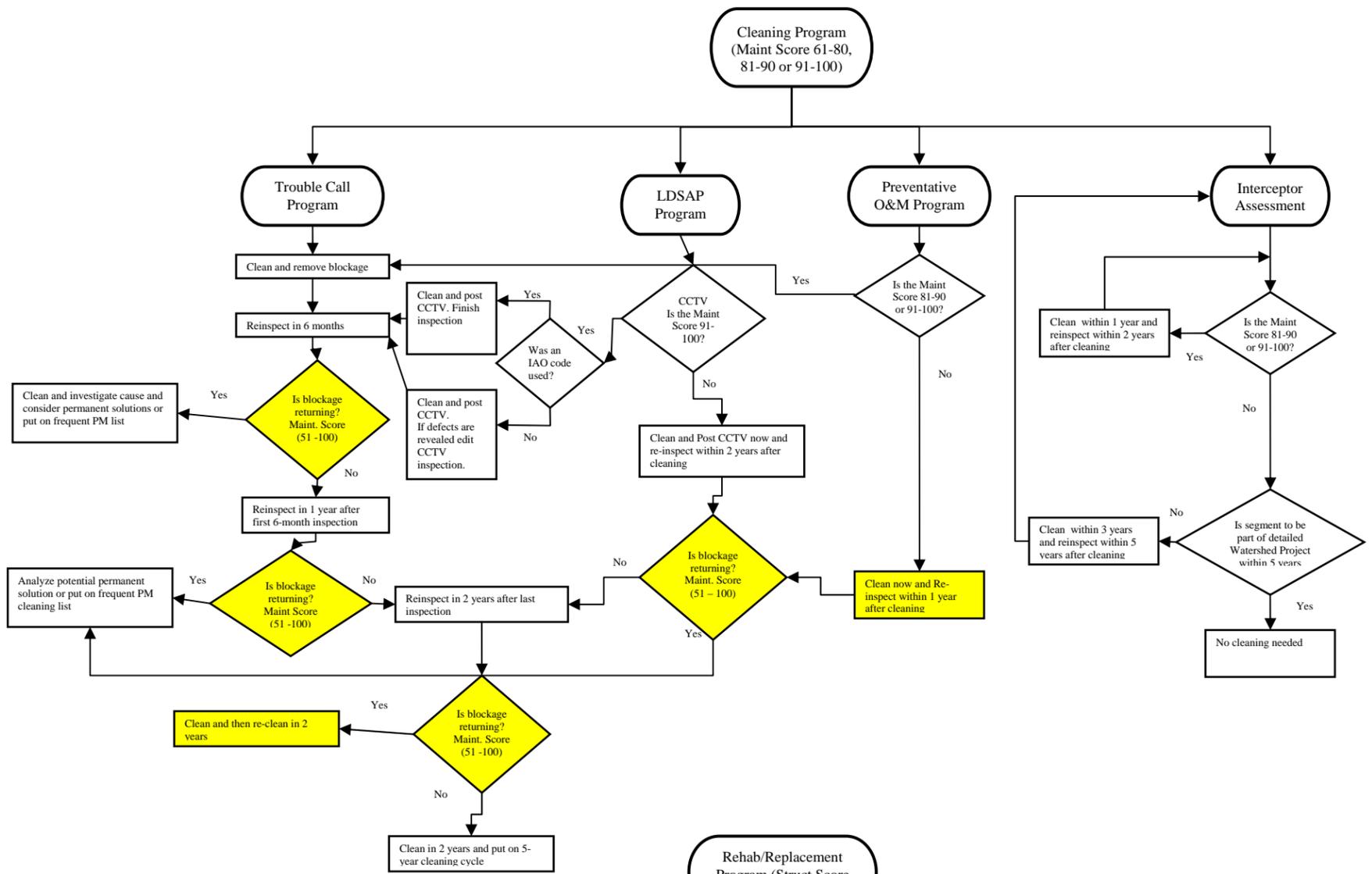
APPENDIX E:

Continuous Sewer Assessment Program Process Diagram

CONFIDENTIAL PRELIMINARY WORKING DRAFT WATERSHED CONSENT DECREE



CONFIDENTIAL PRELIMINARY WORKING DRAFT WATERSHED CONSENT DECREE



- Priority
- Current hydraulic capacity
- Proximity to other pipes (basin basis)
- Watershed Planning
- Extent of defects
- Constructability

APPENDIX F:
Customer Bill of Rights



Customer Bill of Rights

As a customer of SD1, you are guaranteed the following rights:

- You have the right to inspect and review SD1's rates and fee schedule during SD1's normal business days and hours.
- You have the right to service. However, SD1 has the authority to disconnect water service for non-payment pursuant to KRS 220.510.
- You must be provided a separate, distinct disconnect notice alerting you to a possible disconnection of your water service if payment is not received by the applicable due date.
- You have the right to dispute the reasons for any announced termination of your water service.
- You have the right to negotiate a partial payment plan when your water service is threatened by disconnection for non-payment.
- You have the right to maintain your water service for up to thirty (30) days upon presentation of a medical certificate issued by a health official with an agreeable negotiated payment plan.
- You have the right to prompt restoration of your water service when the cause for discontinuance of the service has been corrected. SD1 will promptly contact your water district to have your service restored.
- You have the right as a Residential Customer, to dispute your usage factor. You must submit your request in writing to the address identified below, clearly indicating the reason for the adjustment.
- You have the right as a Non-Residential Customer, to dispute your consumption. You must submit your request in writing to the address identified below, clearly explaining and justifying why the water does not reach the sewer system. Address: 1045 Eaton Dr. Ft. Wright, KY 41017.
- You have the right to be given public notice and attend a public hearing on proposed rate and fee adjustments.
- You have the right to comment on proposed rate and fee adjustments.
- You have the right to submit a petition to SD1's Executive Director regarding any dispute that you have been unable to resolve with SD1. SD1 shall consider the information presented by the customer and other information available to SD1 and shall determine whether the petition shall be granted. SD1 will notify the customer in writing with its decision. Any further appeal of SD1's final decision on a petition must be made to the Kentucky Circuit Court where the property that is the subject of the petition is located within thirty (30) days of the petitioning party receiving notice of the final decision.

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APPENDIX G:

Sewer Lateral Repair and Illegal Connection Inspection and Enforcement Policy

SANITATION DISTRICT NO. 1 SEWER LATERAL REPAIR AND ILLEGAL CONNECTION INSPECTION AND ENFORCEMENT POLICY

BACKGROUND

Since the consolidation of the sanitary sewer system in 1995, the Sanitation District No. 1 (SD1) policy relating to ownership and maintenance of building sewers (also known as sewer laterals) was stated in Article 7, Section 701.1.G, of SD1's Rules and Regulations:

The owner of the premises, served by a sewer shall be responsible for all maintenance, operation, cleaning, repair and reconstruction of the building sewer from the building to the point of connection with the public sewer.

This regulation fully complies with Kentucky law. Nevertheless, the result of this regulation was that in certain instances, property owners were being required to perform excavation and repair work beneath public roadways. Accordingly, SD1 provided some assistance to property owners faced with this difficult and costly situation with subsequent revisions to Article 7, Section 701.1.G, of SD1's Rules and Regulations and sewer lateral Policy amendments made between 1995 and 2004. Article 7, Section 701.1.G, of the Rules and Regulations currently states:

The owner of the premises, served by a sewer shall be responsible for all maintenance, operation, cleaning, repair and reconstruction of the building sewer from the building to the point of connection with the public sewer unless the building sewer is located under a public roadway. If the building sewer is damaged under the paved roadway, SD1 will share in the cost repair as determined by the Board of Directors.

At the November 21, 2006 Board Meeting, the Board of Directors adopted, as an interpretation of Section 701.1.G, the following Sewer Lateral Policy:

The owner of the premises, served by a sewer shall be responsible for all maintenance, operation, cleaning, repair and reconstruction of the building sewer from the building to the point of connection with the public sewer. However, if a property owner conclusively demonstrates, in accordance with the guidelines set out in the Sewer Lateral Repair Policy, that the private sewer lateral is not functioning as a result of a structural problem occurring at a section of the private lateral located beneath the public roadway, the Sanitation District will repair the structural problem of the private lateral from the public sewer to the edge of the public roadway at no cost to the property owner.

At the March 25, 2008 and August 19, 2008 Board Meetings, the Board of Directors revised the Policy to more comprehensively address the repair and maintenance of laterals to help protect waterways by addressing illegal storm water connections into the

sanitary sewer system that can overload sanitary sewers and contribute to sanitary sewer overflows. The revised Policy applies to lateral defects and illegal connections identified by property owners and/or SD1.

On August 19, 2008, the Board of Directors adopted, as a revised interpretation of Section 701.1.G, the following Sewer Lateral Policy:

The owner of the premises served by a sewer shall be responsible for all maintenance, operation, cleaning, repair and reconstruction of the building sewer from the building to the point of connection with the public sewer. However, if a property owner conclusively demonstrates, in accordance with the guidelines set out in the Sewer Lateral Repair Policy, that the private sewer lateral is not functioning as a result of a problem occurring at a section of the private lateral located beneath the public roadway that cannot be corrected through routine sewer cleaning or similar maintenance activities, the Sanitation District will repair the problem of the private lateral from the public sewer to the edge of the public roadway at no cost to the property owner.

I. Definitions

- A. Illegal Connections:** Defined by Article 3, Sections 302.1 and 302.2, of SD1's Rules and Regulations as the direct or indirect discharge of surface water, groundwater, roof runoff, subsoil drains or subsurface drainage to the sanitary sewer system.
- B. Inflow and Infiltration (I/I):** Refers to rainwater and groundwater that enters the sanitary sewer system from a variety of sources such as defective private sewer laterals, roof downspouts, yard drains, foundation drains, stairwell drains, and sump pumps.
- C. Private Sewer Lateral:** This policy shall only apply to private laterals 6 inches in diameter and smaller.
- D. Property Owner:** Refers to both commercial and residential property owners.
- E. Public Roadway:** Defined as the public road from edge of pavement to edge of pavement, including the abutting street curb or the abutting sidewalk, if present, and excluding segments of driveways within the right-of-way.

II. Lateral Problem Within Public Roadway Identified by Property Owner

- A. Purpose:** To provide some assistance to property owners faced with the obligation to perform excavation and repair work of private laterals beneath public roadways.

B. Applicability: This section of the Policy only applies when SD1 has been notified by the property owner that the sewer lateral is not functioning properly and when it is conclusively demonstrated to SD1, in accordance with the provisions of this Policy, that the malfunction is a result of a problem with the private sewer lateral at a point beneath the public roadway that cannot be corrected through routine sewer cleaning or similar maintenance activities. Ownership and maintenance responsibilities shall remain with the individual property owner from the building to the public sewer, including the length of sewer lateral beneath the public roadway. SD1 may, in its sole discretion, approve projects that do not meet the above-mentioned criteria.

C. Problem Identification: The property owner is responsible for hiring a licensed plumber to identify the location of the lateral line and, specifically, the location of the problem. Locating the problem should be accomplished through the use of a "locating device." Measuring distances to the problem is not considered an adequate method to locate the problem. Once the location of the problem has been identified, the plumber should clearly mark the location on the surface of the ground with spray paint or by other appropriate means.

If requested, the plumber will provide SD1 with a videotape of the sewer lateral, which clearly shows the problem causing the sewer lateral malfunction.

SD1 may, in its sole discretion, waive the problem identification requirements on a case-by-case basis.

ote In all cases, the property owner is responsible for 100 of the costs associated with locating the private sewer lateral problem.

D. SD1 Review: SD1 will review the available information, and determine if the information provided is in accordance with the requirements of this Policy. If the information is sufficient, SD1 will approve the project for repair. If additional information is required, SD1 representatives will notify the property owner of the additional requirements.

E. Performance of Repair Work: SD1 will perform the necessary repair work within the public roadway. As part of the repair work SD1 may televise the lateral and perform all necessary smoke and/or dye testing to assess the condition of the lateral and the presence of any illegal connections.

If the work necessary to repair the problem extends beyond the public roadway, SD1 will notify the property owner that he/she must hire a licensed plumber to perform the work outside the roadway at the owner's expense. If SD1 discovers any illegal connections during its assessment of the lateral, SD1 may notify owner that these connections must be removed in accordance with SD1's Sanitary Rules and Regulations and Section III of this Policy.

ote In all cases, D1 reserves the right to require the installation of a vertical cleanout riser near the edge of pavement.

- F. **Indemnity:** The property owner must agree to indemnify and hold SD1 harmless from any causes of action, claims, liability, judgment or expenses, including attorneys' fees and the costs of investigation and litigation, arising out of the project.

III. SD1 Illegal Connection Inspection and Enforcement Program

- A. **Purpose:** The elimination of inflow and infiltration (I/I) into the separate sanitary sewer system from surface water, groundwater, roof runoff, subsoil drains, and subsurface drainage is essential to the efficient operation of SD1's collection, transmission, and treatment systems. SD1's Illegal Connection Inspection and Enforcement Program is intended to proactively and aggressively control and eliminate I/I through system testing, repair and replacement of defective private laterals and removal of illegal connections. The health, safety, welfare and best interests of SD1's ratepayers requires that such sources of I/I be eliminated as expeditiously as possible to aid in eliminating sanitary sewer overflows and water quality degradation. Only those property owners that cooperate in the timely repair of the lateral or elimination of the illegal connections shall be eligible for financial assistance in the form of financing and/or grant money (See Section IV of this Policy).
- B. **Applicability:** This Section of the Policy applies to all illegal connections such as defective private laterals, roof downspouts, yard drains, foundation drains, stairwell drains and sump pumps. This Section applies only to the separate sanitary sewer system. While inflow and infiltration (I/I) is a serious issue for SD1, it is generally not an area of concern in the combined sewer system because there is typically not a separate storm sewer system to receive flow from disconnected I/I sources (downspouts, driveway drains, etc.).
- C. **Authority:** SD1 has authority to implement and enforce this program pursuant to KRS 220.320, KRS 220.322, KRS 220.510 and Articles 3, 7, 9 and 10 of SD1's Sanitary Rules and Regulations.¹
- D. **Inspection:** In conjunction with SD1's normal operation and maintenance practices or construction activities, SD1 may notify property owners that the private lateral must be inspected. SD1 shall attempt to obtain written permission to inspect the private lateral via smoke/dye testing and/or Closed Circuit Television Inspection (CCTV).

If property owner refuses to grant permission, he/she becomes ineligible for financial assistance. SD1 will either attempt to obtain evidence of the violation using an unobtrusive method such as smoke testing, visual observation of the flow in the lateral during a rain event, etc. or shall document the property owner's

refusal to grant permission. The property owner shall then be informed that should SD1 discover an illegal connection and/or should the property owner experience a structural failure in the future, the property owner shall be responsible for all costs of maintenance, operation, cleaning, repair and reconstruction of the private lateral from the building to the point of connection with the public sewer, including that portion located within the public roadway.

E. Notification and Enforcement:

1. After identification of a defect(s) and/or illegal connection(s), SD1 may give written notice to the property owner of the property where such source is located or to the occupant thereof by first class mail or hand delivery, in accordance with Section 701.2.B of the Rules and Regulations. It shall be sufficient if the notice is addressed to and mailed or delivered to the person or persons in whose name application was made for water service for that location.
2. If the defect(s) in the private lateral is located beneath the public roadway, Section II of this Policy may apply.
3. If the defect(s) and/or illegal connection(s) to the private lateral are located outside the public roadway, the person or persons so notified shall within thirty (30) calendar days of the date of mailing or delivery of such notice deliver to SD1, 1045 Eaton Drive, Ft Wright, Kentucky 41017, a plan, prepared by a licensed plumber, to address the defect(s) and/or remove the illegal connection(s). The plan shall include a detailed description of the work to be performed, a drawing showing the defect(s) and/or illegal connection(s) and the method of its elimination if feasible and a cost estimate for the work. If elimination is deemed not possible or practicable, the plan shall provide a written demonstration of infeasibility (repair costs alone are insufficient to demonstrate infeasibility of elimination).
4. SD1 staff shall review each plan and approve or deny same within thirty (30) calendar days after receipt. Notice of this action shall be promptly communicated to the person submitting the plan. If the submitted plan is denied by SD1 staff, the notified person or persons shall submit a revised plan acceptable to SD1 within thirty (30) calendar days for review and approval.
5. After receipt of notification of plan approval, the person submitting same shall have sixty (60) calendar days in which to complete the work outlined in the approved plan and notify SD1 of such completion. Upon receipt of notice of completion, SD1 shall inspect the work and retest the lateral and system.
6. Failure to comply: If the property owner fails to comply within the time frames indicated above and fails to request and receive an extension of time pursuant to section 7 below, SD1 may utilize any of the following enforcement actions:
 - a. In accordance with Section 302.3 of the Rules and Regulations, "Should the owner of such an illegally connected premises fail to remove the illegal connection within 90 days of being notified by the General Manager to do so, the General Manager may cause the connection to be removed and the cost thereof to be billed to the owner of the premises."
 - b. Assess administrative fines of up to \$1,000 per day pursuant to KRS 220.320 and Section 1001.2.A of the Rules and Regulations.

- c. Institute an action in court pursuant to KRS 220.320 and Section 1001.2.B of the Rules and Regulations. The available remedies shall include:
 1. Injunctive relief;
 2. Cost recovery to recover the cost associated with noncompliant acts of a user;
 3. Civil penalties of up to \$1,000 per day per violation; and
 4. Termination of wastewater treatment service.
 - d. If SD1 incurs costs for services rendered, it may, by notice in writing, shut off water service to said premises in accordance with KRS 220.510. Furthermore, KRS 220.322(4) states that “Charges [for disconnections, reconnections, or relocations of sewers] not paid when due may cause the board of directors to compel payment in the manner authorized in this chapter and the rules and regulations of SD1.”
7. Extensions of time: The General Manager may, for good cause shown, grant an extension of any of the deadlines set out in this Policy, provided that the request for the extension is received prior to the expiration of the deadline. The extension shall be issued in writing and shall specify the date of its termination.

IV. FINANCING AND GRANT PROGRAM FOR DEFECTIVE PRIVATE LATERAL REPAIRS AND REMOVAL OF ILLEGAL CONNECTIONS OUTSIDE PUBLIC ROADWAY

- A. **Purpose:** To provide financing and/or funds to eligible property owners faced with the obligation to perform excavation and repair work of private laterals outside public roadways.
- B. **Financing:** For removal of illegal connections and/or repairs to damaged laterals outside the “public roadway” as defined above, the property owner will obtain the services of a licensed plumber. SD1 may at its discretion advance funds for payment of the plumber’s invoice and offer a finance option to allow the property owner to repay SD1 with interest at a rate of two basis points above prime rate at the time that financing is initiated with a minimum interest rate of six (6) percent and a maximum interest rate of ten (10) percent over a term not to exceed fifteen (15) years. Furthermore, the property owner shall grant a consensual lien to SD1 to be placed on the property in order to guarantee payment recovery.
- C. **SD1 Grant Program for Sanitary Service Improvement Projects:** As part of its Consent Decree with the U.S. EPA and Commonwealth of Kentucky, SD1 has developed a program to reimburse qualified residential property owners for a portion of the cost of certain sanitary sewer improvement projects. Candidate projects would include the repair or replacement of failing sanitary service laterals and the installation of new sanitary service connections to SD1 sewer mains. Approved residential property owners may be eligible to receive grants of up to \$5,000 towards such projects, depending on their income level. Routine operation and maintenance projects such as root-cutting or cleaning are not included in this program. Per the Consent Decree, this program will expire in April 2012.

D. Eligibility:

1. Financing - Property owners that cooperate in the timely repair of the lateral or elimination of the illegal connections are eligible for financing.
2. Grant Program – Residential property owners with incomes at or below the low income level as established by the U.S. Department of Housing and Urban Development (HUD) are eligible to apply for funding through this program. Proof of income documentation must be included with the project application.

V. Cost-Share Pilot Program for Defective Private Lateral Repairs and Removal of Illegal Connections Outside of Public Roadway

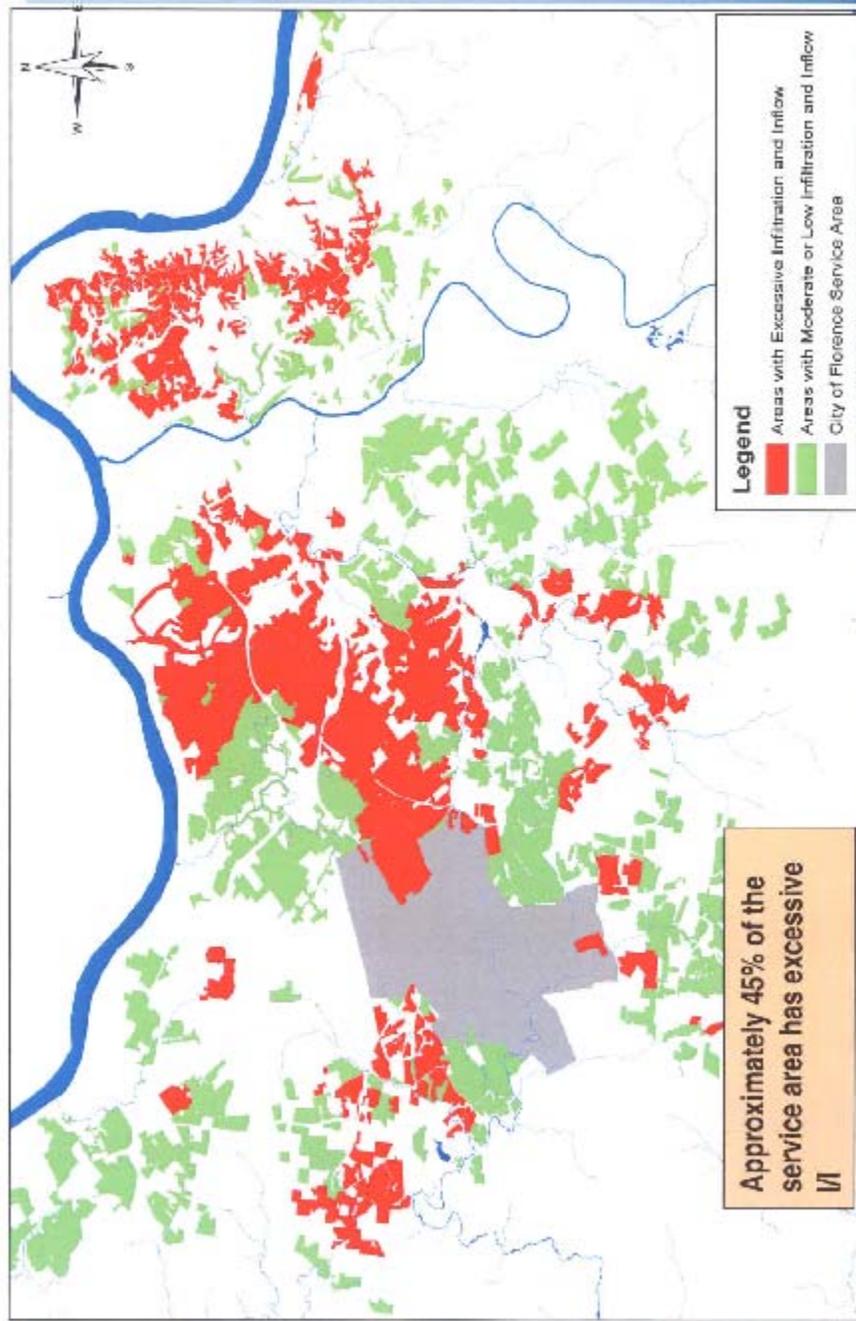
- A. **Purpose:** To encourage property owners to voluntarily repair private systems that are located in priority areas determined by SD1 to have excessive amounts of I/I. Section III of this policy shall govern how the repairs are properly performed.
- B. **Cost Share:** This policy allows SD1 to reimburse property owners 50% of the costs to properly remove the I/I, with a maximum contribution of \$2,500 per property.
- C. **Eligibility:** The property must be found to have excessive amounts of I/I as determined by SD1 and be located within one of the areas depicted in red on the attached map (attachment A). It must also be determined by SD1 that removal of I/I on the property will further compliance with SD1's Consent Decree.
- D. **Duration:** The pilot program began on July 1, 2009 and will continue through June 30, 2011, at which time SD1's Board of Directors will evaluate the outcomes and benefits of this pilot program and make a determination for its continuance.

VI. History/Revision Dates:

Board Approval: November 13, 2000
March 5, 2001
July 29, 2004
March 25, 2008
August 19, 2008
October 13, 2008
September 15, 2009
December 15, 2009
June 15, 2010

Attachment A

Areas with Excessive I/I



¹ PRIVATE SEWER LATERAL AND ILLEGAL CONNECTION ENFORCEMENT AUTHORITY

KRS 220.322(1)(a). The board may adopt rules requiring owners of property to disconnect storm water inflows to sanitary sewers maintained and operated by the district and not operated as a combined sewer, or to connections with these sewers.

KRS 220.322(2). Any inflow required to be disconnected under a rule adopted pursuant to this chapter shall constitute a nuisance subject to injunctive relief and abatement.

KRS 220.322(4). The board shall require in its rules regarding disconnections, reconnections, or relocations of sewers the reimbursement of moneys expended. This shall be done by the district assessing a charge to the property owner for immediate payment or payments in installment with interest as determined by the board not to exceed 10%.

KRS 220.322(4). Charges for disconnections, reconnections, or relocations of sewers not paid when due may cause the board of directors to compel payment in the manner authorized in this chapter and the rules and regulations of the district.

KRS 220.510. "In case of failure of any user to pay for services rendered, the board may compel payment and may enjoin further use until the payment is made, or it may institute an action in any court having jurisdiction ...or the board may, by notice in writing, signed by the chairman or any member of said board, notify the [entity] which furnishes water to the user's premises, to shut off the water service to said premises, until such time as all delinquent charges, plus a reasonable charge for turning off the water service, against said user, are paid in full."

The Sanitary Rules and Regulations outline SD1's procedures for inspection and rehabilitation of private sewer laterals and the appeals and enforcement processes.

Article 3, Section 302.1. "No person shall discharge or cause to be discharged, either directly or indirectly, to the sanitary sewer system, surface water, groundwater, roof runoff, subsoil drains or subsurface drainage."

Article 3, Section 302.2. "Any such connections made ... shall be considered illegal and shall be subject to immediate removal by the owner of the premises so connected and at such owner's expense."

Article 3, Section 302.3. "Should the owner of such an illegally connected premises fail to remove the illegal connection within 90 days of being notified by the General Manager to do so, the General Manager may cause the connection to be removed and the cost thereof to be billed to the owner of the premises."

Article 7, Section 701.2.B. "No person or public corporation shall make direct connection of roof downspouts, exterior or interior foundation drains, area drains or other sources of surface runoff or groundwater directly to a public sanitary sewer. Upon discovery of such improper sources, SD1 may notify the property owner to remove any improper connection within 30 days of notification and return the public sewer and associated appurtenances to a satisfactory condition."

General Enforcement Authority

KRS 220.320. Authorizes the board to recover by civil action from any person or public corporation violating the regulations a penalty of \$100 to \$1,000 for each offense, plus costs. The Board may enforce by mandamus or otherwise all necessary and authorized regulations made by them, and may remove any improper construction or close any connections made improperly or in violation of the regulations.

Article 9, Section 901.4. "The General Manager and other employees of SD1 shall have the authority to serve notices of violation of these Rules and Regulations. The General Manager shall be responsible for the enforcement of these Rules and Regulations and shall have authority to issue orders and impose penalties as authorized therein, ...and shall have any other powers or authority necessary and proper for the enforcement and the achievement of the goals of these Rules and Regulations."

Article 10, Section 1001.1.A. If any person or public corporation is found to be violating any provision of these Rules and Regulations, the General Manager may:

- (1) Enforce these regulations by mandamus or otherwise;
- (2) Remove any improper construction or close any connections made improperly or in violation of these regulations;
- (3) Revoke any permit issued pursuant to these regulations;
- (4) Recover by civil action from any person or public corporation violating any regulation, a sum of not less than \$100 nor more than \$5,000 for each offense, together with costs.

Administrative Enforcement Remedies

Pursuant to Article 10, Section 1001.2.A of the Rules and Regulations, SD1 may invoke the following remedies:

- (1) Notice of Violation (NOV)
- (2) Administrative Orders such as:
 - Cease and Desist Orders
 - Show Cause Orders
- (3) Administrative Fines
 - General Manager may assess a penalty of up to \$1,000 per day for each violation of SD1's Rules and Regulations

Judicial Enforcement Remedies

Judicial remedies may be sought pursuant to Article 10, Section 1001.2.B in the following situations: (1) when notices of violation and administrative orders have proven ineffective in returning the violating user to compliance; (2) when emergency situations require injunctive relief to halt or prevent discharges which threaten human health or the environment or interfere with the treatment system or (3) to impose civil penalties and recover losses incurred due to noncompliance. All judicial administrative remedies will be sought at the discretion of the General Manager. The available remedies include:

- (1) Injunctive Relief - where an administrative order does not achieve compliance;
 - (2) Cost Recovery - to recover the cost associated with noncompliant acts of a user;
 - (3) Civil Penalties - \$1,000 per violation for individuals and \$5,000 per violation for corporations; and
 - (4) Termination of Wastewater Treatment Service – the General Manager may terminate or cause to be terminated wastewater treatment system service to any premise if a violation is found to exist.
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APPENDIX H:
Records Management Policy

Sanitation District No. 1 Record Management Policy

I. Purpose

While working in conjunction with Kentucky Department for Libraries and Archives (KDLA), this policy is intended to:

- A. Define how Sanitation District No. 1 (SD1) will comply with Kentucky's public records management statutes KRS 171.410-171.748 and the rules and regulations of the KDLA for maintaining, storing, and disposing of public records. Public records are further defined below and include but are not limited to, books, papers, maps, photographs, cards, tapes, discs, diskettes, recordings, software, and other documentary materials, regardless of physical form or characteristics, which are prepared, owned, used, in the possession of or retained by the public agency. (KRS 171.410 and KRS 61.870(2))
- B. Keep records organized and maintained to ensure they are readily available upon request from either the public or within SD1, at the lowest possible cost.
- C. Efficiently, economically, and effectively maintain systematic control of recorded information regardless of format, from original creation to ultimate disposition.
- D. Ensure that SD1 is creating and maintaining an adequate documentary record of our functions, policies, decisions, procedures, and essential daily transactions of business.

II. Scope

This Record Management Policy ("Policy") applies to **ALL** employees of SD1 who are responsible for the records they create and maintain regardless of the format of the public record.

III. Policy

SD1 will follow the "Local Governments General Records Retention Schedule" ("Retention Schedule") (updated May 2010) as developed and approved by KDLA. Federal and State regulations require SD1 to adhere to numerous record retention mandates. (See SD1 Records Coordinator or the Admin tab on the Intranet for the complete Retention Schedule) The appropriate time periods for record retention are specific and subject to ongoing statutory and regulatory changes.

SD1 requires that its public records be maintained in a consistent and logical manner and be managed so that SD1:

- Meets legal standards for protection, storage and retrieval
- Protects the privacy of staff
- Optimizes the use of space
- Minimizes the cost of record retention

- Destroys outdated records in the appropriate manner

Departments, in cooperation with the Records Coordinator, are responsible for establishing appropriate records management procedures and practices. Each department is to have a department liaison assigned who will be responsible for maintaining the record content, safe storage, accessibility and its destruction per this policy, as well as:

- A. be familiar with SD1's Records Management Policy;
- B. educate staff within the department on sound record management practices;
- C. restrict access to confidential records and information if applicable;
- D. coordinate the destruction of records with the Records Coordinator;
- E. work with the Records Coordinator in identifying and retrieving records requested under the Open Records Act; and
- F. maintain an organized filing structures to aid in separating informational, temporary, and permanent records and to ensure that valuable records are not accidentally lost or misplaced.

All records should be inventoried and analyzed for administrative, legal, financial and historical values to ensure that:

- A. valuable records are adequately preserved; and
- B. non-public records and obsolete records are destroyed in accordance with authorized records retention schedules.

No person shall remove the originals of public records from the office of SD1.

IV. Definitions

Disposition: In records management, the term "disposition" refers to what is done with records when they are no longer needed for current business.

Electronic messages: Any message sent or received by an electronic messaging system. Electronic messages may be in the form of electronic mail (e-mail); text messages (such as on a Blackberry or other portable device); voicemail messages (in a voice mailbox on a phone, or as audio files in a unified messaging environment); or faxed messages

Electronic records: means a record created, generated, sent, communicated, received or stored by electronic means. .

Public Agency: "A public agency is defined in KRS 171.410 (4) as "every state or local office, state department, division, bureau, board, commission and authority; every legislative board, commission, committee, and officer; every county and city governing body, council, school district board, special district board, municipal corporations, and any board, department, commission, committee, subcommittee, ad hoc committee, council or agency thereof; and any other body which is created by state or local authority and which derives at least twenty-five percent (25%) of its funds from state or local authority."

Public Record or Records: Means “all books, papers, maps, photographs, cards, tapes, discs, diskettes, recordings and other documentary materials, regardless of physical form or characteristics, which are prepared, owned, used, in the possession of or retained by a public agency. “Public record” shall not include any records owned by a private person or corporation that are not related to functions, activities, programs or operations funded by state or local authority.” (KRS 171.410) Records can also mean electronic records such as “data or information created or received in the course of agency business; that has been fixed on some medium; that has content, context, and structure; and that is maintained as evidence of that activity” as defined in *Challenges in Managing Records in the 21st Century*.

Official Correspondence: Documentation of major activities, functions, events and programs of a local government and in addition helps in the establishment of an administrative history. It provides a record of policy evolution and formulation, how and why decisions are made, and how these decisions impact the local government and the public at large. Official correspondence is usually created by the chief administrative officer of the local government but may be supplemented by administrative heads of official departments, commissions, boards and agencies within the local government.

Permanent Record: Document which is retained permanently because of its administrative, historical, or legal value.

Records Retention Schedule: Retention schedules are inventories, or lists, of all records that agencies create, use or maintain, together with information indicating how long a record should be kept to meet business needs and what should happen to it when the business need has ended. Maintaining documentation of essential transactions and information on an agency over time requires that certain records be retained permanently, while efficient, effective business operations dictate that selected records be destroyed when there is no further use for them.

Record Series: Record series is a certain category of documents related to a particular subject or function, resulting from the same activity, having a common form. Example may include the accounts receivable file, it contains many different records such as claim books, vouchers, and receipts that are records in their own right but together they form a series.

Routine or General Correspondence: Documentation of a non-policy nature and deals only with the day-to-day, general operations of an agency. It is incoming and outgoing correspondence that may consist of: e-mail, letters, notes, postcards, memoranda, and announcements. They can be found at all levels of an organization and in any format. It documents business-related correspondence that is not crucial to the preservation of the administrative history of an agency. (Retention Schedule, series L4955) This series does not include: non-business related messages, spam, junk mail, or duplicate copies of general announcements. (See Retention Schedule, Informational and Reference Material (L4956) and Non-Business Related Correspondence (L5866)).

Vital Record: Document, file, or record in any form or format, containing information that is (1) essential to the operations and/or survival of the organization; (2) necessary

to recreate the organization's legal and financial position; and (3) necessary to preserve its claims and rights and those of its stakeholders.

V. Public Records Management Procedures

A. Record Retention Guidelines

The first step in determining the retention requirements for a public record is to ask, "is it related to SD1 business?"

If the answer is "**No**," it is considered a non-business-related record. Non-business related records (Retention Schedule, series L5866) have nothing to do with the actions of the agency and should be deleted or discarded immediately. Examples may include: personal notes; "to do" list; personal e-mails; spam and unsolicited e-mails.

If your answer is "**Yes**," the information is business-related, then the second step is that you must determine the category of the record and retain according to the Retention Schedule. Records that are business related may have one of three different values to SD1 depending on the information in and the function of the record. The following examples of categories of record series may be found on the Retention Schedule (see SD1 Records Coordinator or the Admin tab on the Intranet for the complete Retention Schedule):

- **Informational and Reference Material:** Delete when no longer needed. Examples are: Periodicals, books, brochures, tracking tools, logs, notes to co-workers, or general announcements received by all employees such as news of an upcoming fire drill or impending building repair.
 - **Informational and Reference Material series L4956**
 - Disposition: Destroy when no longer useful
- **Temporary Record:** Save to shared drive or the document management system, delete according to the Retention Schedule. These records have some documentary value to SD1, but do not need to be retained permanently. The time period may range from a few months to several years and must remain accessible for the entire retention period as specified in the Retention Schedule. Examples:
 - **Routine Correspondence series L4955**
Disposition: Retain for 2 years, destroy (retain longer if needed for administrative, fiscal, legal or historical requirements, upon approval of the SD1 Records Coordinator)
 - **Billing Payment Stubs series L0945**
Disposition: Retain for 3 years, destroy (retain longer if needed for administrative, fiscal, legal or historical requirements, upon approval of the SD1 Records Coordinator)
- **Permanent Record:** Print and file; and save to the document management system. These records document the function and duties of SD1. Examples:

- **Official Correspondence** series **L4954**
- **Meeting Minutes** series **L4958**
- **Annual Reports** series **L4951**
- **Capital Improvement Projects** series **L4774**
- Disposition: Retain permanently

B. Managing Electronic Mail

E-mail messages are electronic messages that are created, stored, and delivered in an electronic format. E-mail messages are a form of business communication and they may contain information about SD1's business activities which, like public records in other formats, are subject to audit, open records request, and for legal processes such as discovery and subpoena.

1. Applicability:

This Policy applies to any and all electronic mail ("e-mail") messages created, received, retained, used, or disposed of using SD1's electronic mail system regardless of how the system is accessed. Mobile computing devices (such as Blackberries and other Personal Digital Assistants (PDAs) or smart phones) allow for remote access to SD1's e-mail system and should be treated just like the system in your office or workstation. SD1 prohibits the use of business-related chats on Blackberries.

2. Retention Requirements:

The content and function of an e-mail message, including any attachments, determine its retention period. It is the responsibility of the user of the e-mail system to manage e-mail messages according to the Retention Schedule and the Record Retention Guidelines set forth in Section A above (i.e. Information and Reference Material, Temporary Record, or Permanent Record). All retained e-mails must be saved with a clear and concise subject line (i.e., include project code and/or project name when applicable) and filed in identified folders within the e-mail system. This will aid in search processes.

Most e-mail, but not all, is considered correspondence and may be part of one of several categories of correspondences (or record series), described in the Retention Schedule. Categories of Correspondence may include Routine Correspondence as defined above, or it may include, but is not limited to, the following:

- **Nonbusiness Related Correspondence** series **L5866** (NOTE: Nonbusiness Related Correspondence is a public record, as defined by the Open Records Act (KRS 61.870-61.884) and, if retained, can be subject to disclosure).
- **Informational and Reference Material** series **L4956**

Because e-mail messages (including attachments) can be forwarded and routed to multiple addresses, copies of the names of sender, recipient, date/time of the message, as well as any attachments must be retained with the message. Except for listserv mailing services, distribution lists must be able to identify the sender and recipient of the message.

3. Disposition of electronic mail:

An e-mail record, including attachments, can be retained for up to ten years within the e-mail system.

It is the official policy SD1 that all e-mail messages found to be classified as Routine Correspondence (Retention Schedule, series L4955) will be archived and backed-up for two years in accordance with the Retention Schedule. If no further hold is placed on routine correspondence e-mail during the two-year period, it will be deleted from the system at the end of the retention period.

Any e-mail and/or its attachment(s) that is considered a **permanent record** according to the Retention Schedule, should be archived into the Laserfiche Document Management System for permanent retention.

Records Destruction Certificate for E-mail: Due to the volume of e-mail and the frequency of deletion, completing a records destruction certificate for e-mail records is not practical, and therefore, is not required for e-mail destruction.

Please remember, your electronic messages are to be used to conduct SD1's business. SD1 may disclose electronic messages at any time and you should have no expectation of privacy or confidentiality in such messages.

C. Storage and Retrieval of Records

1. Active Records:

“Active records” are all records used daily for current projects and research. Active records will be maintained in the department where they are generated and used. Because of this, the records will not be considered “centrally located” or “archived” but will be maintained all the same. Maintaining records will consist of developing a logical filing system in conjunction with the department liaison and the SD1 Records Coordinator. In doing so, SD1 staff will need to:

- a) Organize files to locate a “record series” in one category of files.
- b) File all record series together that are to be destroyed together.
- c) Revise filing systems that mix series together unnecessarily.

- d) File documents together that have the same retention period for a particular series. All record series that are to be archived at the same time should be filed together.
 - e) Implement the use of "OUT" cards when removing files. This will help identify who has taken a file and when.
2. Inactive Records:

"Inactive records" are those that are no longer needed on a daily basis or have a low retrieval rate. These records will be maintained in the archive room until the scheduled date of destruction as been met. Consult the department liaison or the SD1 Records Coordinator if unsure of a record's status.

D. Archiving Records

1. "Weeding" Records:

When filing records or preparing records for transfer to Archives, please discard the categories of records listed below. The result is significant savings in storage space, and faster and more efficient retrieval of information for research purposes. Extensive weeding is necessary when there are voluminous records or contain duplicate copies of records. **Transfer only those public records that are original to your department.**

The records listed below will not be transferred to the Archives unless your department is the originating department:

- **Drafts:** Archives should receive only the final version of a record. Transfer draft copies only when significant comments or annotations appear (i.e., to show history or decision-making process).
- **Routine correspondence:** Including letters of transmittal or cover letters that merely forward an enclosure and add nothing to the content of the item transmitted; meeting announcements; invitations; acknowledgments; and routine request for general information, such as brochures and catalogs.
- **Memoranda:** Only those sent by your department bearing your responsibility should be transferred. Discard those concerning routine matters, such as holidays, vacation schedules, etc. Retain those concerning policies, procedures, and collections.
- **Routine administrative records:** Including purchase orders, travel vouchers, requests for building services and maintenance, time sheets, applications for leave, training files.
- **Research material:** Clippings, photocopies of published materials, and photocopies of archival materials collected as background, informational, or research material. Maintain research material until administrative or research need no longer exist.
- **Purge duplicates and non-public records:** Non-public records are duplicate copies of reports, obsolete equipment manuals and warranties, informational brochures, supply and vendor catalogs, drafts, blank forms, reference material. Any recorded information which is original and unique is a record, if these qualities are absent, it is probably a non-public record.

2. Request a supply of storage totes:

Requests for storage totes may be directed to the Records Coordinator. Storage totes will then be provided at a mutually agreeable date and time.

3. Record Storage Procedures:

- a) All files should be in labeled file folders.
- b) Remove file folders from hanging folders, 3-ring binders, and remove any rubber bands that have been used.
- c) Transfer the files in manila file folders that are clearly labeled, ensuring that the folder titles/labels are intact and visible.
- d) As you transfer files from file cabinets to totes, make sure to keep the files in their original filing order. (If filing by year or date, put current year/date first, older files in the back.)
- e) Pack the records loosely in the storage tote (you should be able to get your fist between the last of the folders and the tote).

4. Records Transmittal to Archive:

Complete the Records Transmittal to Archive form (see Appendix 2) for each record series and place inside the tote (form is also available in PDF format on the Admin tab of the Intranet.) If you need help, including but not limited to, determining the applicable record series, call the Records Coordinator at ext. 6742. Contact the Records Coordinator to request pick up of your totes.

Do not fill in the destroy date; this will be done with red permanent marker by the Records Coordinator.

Do not mark totes as "John Doe's Files," or "Misc." – neither naming process helps in retrieving information.

5. What happens to my records after they go to Archive?

The Records Coordinator will inspect the records and compare the transmittal list against the contents. *The Records Coordinator reserves the right to decline any transfers until such time as the above conditions are met.* After records have been approved for acceptance, the Records Coordinator will transfer information provided on the transmittal form into the archive log sheet, which will provide the numbered location where the tote will be stored.

6. How do I get into Archive?

Please e-mail or call the Records Coordinator for access to the archive room. In the event the Records Coordinator is not available, please contact the Office Manager, the Second Floor Administrative Assistant, or the Employee Benefits & Development Manager in Human Resources.

7. What do I need to do if a record needs to be retrieved from Archive?

After gaining access and the record is retrieved you will need to complete an "Outslip" (see Appendix 2). The form is also available from the Records Coordinator. You are responsible for completing all information on the Outslip except for the "Date of Return," which will be entered by the Records Coordinator.

E. Destruction of Records at the End of the Retention Period:

1. Procedures for Destruction of Records: Before records destruction can occur, the following must take place:

- a) Compare your records with the records listed on the Retention Schedule. Make sure the series is listed.
- b) Verify the records are not subject to any litigation hold, pending court case, or open records request.
- c) Verify the records are of no further administrative or business use to SD1.
- d) Complete a Records Destruction Certificate (see Appendix 2). Indicate the record series number, estimated volume, inclusive dates for each series to be destroyed.
- e) Notify the Records Coordinator via interoffice mail of pending destruction and await authorization to destroy records. The Records Coordinator will sign the Destruction Certificate and send signed copy back to you, authorizing the destruction.
- f) Following receipt of this approval, all records recorded on the Destruction Certificate may be legally destroyed.
- g) Place sensitive records in one of our three secured shred boxes for destruction. This will ensure that the records have been destroyed and the destruction form from the shredding contractor is received and on file.

2. Methods of Destruction:

- a) Shred - Records that have special security requirements or that bear sensitive, personal information (e.g., S.S. numbers, credit card numbers, names, addresses, phone numbers) should be placed in a locked shredding box. Record deposited records on clipboard provided. A KDLA Records Destruction Certificate will be completed by the Records Coordinator.
- b) Recycle - for all records not requiring shredding, place in the blue recycling bin.

3. My records are not listed on the Retention Schedule, what should I do?

Questions concerning retention periods for records not included in the Retention Schedule should be directed to the Records Coordinator. The Records Coordinator will then work in compliance with KDLA to determine the value of the record and the retention and/or destruction requirements.

VI. Litigation Hold

A “litigation hold” is a suspension of SD1’s document retention/destruction policies for those documents that may be relevant to a lawsuit that has been filed or is reasonably anticipated. It includes but is not limited to, civil actions; claims; audits; and government agency charges, investigations and/or enforcement actions. These records should be retained until final resolution of the above described actions. To ensure that relevant records and electronic data is not destroyed:

- A. SD1’s General Counsel will notify necessary departments and staff to identify and preserve any records (including electronic records) or other information that could be relevant to the dispute.
- B. If at any time SD1 has been notified of impending litigation, the Retention Schedule becomes moot and all records subject to the litigation hold should be maintained until further notice from SD1’s General Counsel.
- C. If the public records that are subject to the litigation hold become a part of the Litigation File (Retention Schedule, series L5373), then it must be retained for 10 years after all litigation has ceased.

VII. Open Records Act And Requests For Public Records

- A. The basic policy of the Open Records Act as stated by the Kentucky General Assembly “is that free and open examination of public records is in the public interest and the exceptions provided for by KRS 61.878 or otherwise provided by law shall be strictly construed, even though such examination may cause inconvenience or embarrassment to public officials or others.” (KRS 61.871)
- B. Please refer to SD1’s Open Records Policy in Appendix 3.
- C. If you receive an Open records request, it must be date stamped on the day it is received and delivered to the Records Coordinator and General Counsel **on that day. Do NOT send via interoffice mail.**
- D. The Records Coordinator will send an E-mail to all department liaisons and pertinent employees who likely have the requested records, seeking production of any public records described by the request. Public records must then be provided to the Records Coordinator and/or General Counsel **immediately for review. (IMPORTANT NOTE: SD1 has three (3) working days in which to respond to the request and make the public records available.)**

- E. The form for the inspection of the public records (see Appendix 3) is available on the Admin tab of the intranet or the website www.sd1.org or will be furnished upon request. Assistance in completing the Request to Inspect Public Records form will be provided by an employee upon request.
- F. **Electronic messages are public records, they are subject to the same open records requirements as any of SD1's other public records.** Electronic messages must be managed in such a way that SD1 can respond promptly to open records requests. Electronic messages that are available for public inspection must remain accessible throughout their *entire* retention period and should be maintained in a manner which permits efficient and timely retrieval (see Section VI, item 3 of this policy).
- G. Any questions about your obligations or the process to identify and retrieve requested public records, or any other comments should be directed to the Records Coordinator and/or the General Counsel.

IX. Available Assistance

Additional help is available through the Records Coordinator at extension 6742, or via e-mail. The Records Coordinator can provide assistance with the Retention Schedule, destruction certificate forms, and other records management questions that arise. In the absence of the Records Coordinator, please contact the Office Manager or General Counsel.

X. Enforcement

Failure to comply with the Retention Schedule and associated guidelines and procedures stated in this Policy can result in disciplinary action and/or penalties.

XI. History/Revision Dates

Origination Date: December 27, 2007
Board Approval: August 19, 2008
Revised/Board Approval: July 27, 2010

XII. Appendices

Appendix 1: Acceptable Use Policy
Appendix 2: Records Destruction Certificate
Volume Equivalent Chart
Records Transmittal to Archive
Outslip
Appendix 3: Open Records Policy
Request to Inspect Public Records

APPENDIX 1

Acceptable Use Policy

Acceptable Use Policy

Information Technology Department

I. Overview

SD1's intentions for publishing an Acceptable Use Policy are not to impose restrictions that are contrary to SD1's established culture of openness, trust, and integrity. SD1 is committed to protecting its employees, partners and the organization from illegal or damaging actions by individuals, either knowingly or unknowingly. Damages include the loss of sensitive or confidential business information, intellectual property infringement, damage to public image, damage to critical SD1 internal systems, etc.

Internet or Intranet-related systems, including but not limited to computer equipment, software, operating systems, storage media, network accounts providing services including but not limited to electronic mail, web browsing, and FTP, are the property of SD1. These systems are to be used for business purposes in serving the interests of the organization, and of our clients and customers in the course of normal operations.

Effective security is a team effort involving the participation and support of every SD1 employee and affiliate who deals with information and/or information systems. It is the responsibility of every computer user to know these guidelines, and to conduct their activities accordingly.

II. Purpose

The purpose of this policy is to outline the acceptable use of computer equipment and network resources (both local and remote) at SD1. These rules are in place to protect the employee and SD1. Inappropriate use exposes SD1 to risks including virus attacks, compromise of network systems and services, and legal issues.

III. Scope

This policy applies to all SD1 employees, contractors, vendors and agents connecting to the SD1 data network using any electronic device (computer, Smartphone, etc) that is connected to the SD1 network by any means (copper wire, wireless, VPN, Citrix Secure Gateway, etc).

IV. Policy

1. General Use and Ownership

- A. While SD1 desires to provide a reasonable level of privacy, users should be aware that the data they create on the organization's systems remains the property of SD1. This includes information stored on computers, laptops, servers, Blackberry devices and other similar devices. Because of the need to protect SD1's network, management cannot guarantee the confidentiality of information stored on any device belonging to SD1.

- B. Employees are responsible for exercising good judgment concerning the reasonableness of personal use in accordance with the Acceptable Use Policy. Individual departments may establish more stringent guidelines as long as they do not conflict with or contradict the Acceptable Use Policy. In the event of a conflict, this policy will take precedence over any departmental guidelines.
- C. It is the responsibility of SD1 employees, contractors, vendors and agents with remote access privileges to SD1's corporate network to ensure that their remote access connection is given the same consideration as the user's on-site connection to SD1.
- D. For security and network maintenance purposes, authorized individuals within SD1 may monitor equipment, systems and network traffic at any time.
- E. SD1 reserves the right to audit networks and systems on a periodic basis to ensure compliance with this policy.
- F. Computers and other electronic devices not owned by SD1 must not be connected to SD1's network without prior authorization from a senior manager and the IT Manager.
- G. Personal peripheral equipment such as keyboards, mice, and printers may not be attached to any SD1 equipment without prior authorization from a senior manager and the IT Manager.

2. Security and Proprietary Information

- A. Employees should take all necessary steps to prevent unauthorized access to confidential information. Examples of confidential information include but are not limited to: human resources data, customer account information and data associated with litigation.
- B. Authorized users are responsible for the security of their passwords and accounts. Keep passwords secure and do not share account information with anyone.
- C. All PCs, laptops and workstations should be secured with a password-protected screensaver with the automatic activation feature set at 10 minutes or less, or by logging-off or locking the desktop when the device will be unattended.
- D. Because information contained on portable computers is especially vulnerable, special care should be exercised. Do not leave laptops, PDAs or SD1 issued Smartphone (Blackberry, etc.) unattended (e.g. in your car).
- E. All hosts used by the employee that are connected to the SD1 network either locally or remotely, whether owned by the employee or SD1, shall be continually executing approved virus-scanning software with the most current virus database.
- F. Employees must use extreme caution when opening e-mail attachments received from unknown senders, which may contain malicious code including viruses,

spyware and trojan programs. Please contact the IT Department if you have any concerns about e-mail.

- G. To ensure that all information created in the course of SD1 business is secure and backed up, ALL data must be saved to servers designated for storing files (e.g. network shares, document management systems, etc.) **No information should be stored on local PCs or laptops.**

3. Social Media

Social media includes the various online technology tools that enable people to communicate easily via the internet to share information and resources. Social media can include text, audio, video, images, podcasts, and other multimedia communications. Examples include but are not limited to LinkedIn, Twitter, Facebook, YouTube and MySpace. Social media are powerful communications tools that have a significant impact on organizational and professional reputations. Because they blur the lines between personal voice and institutional voice, employees need to follow the same behavioral standards online as they would in real life. The same laws, professional expectations, and guidelines for interacting with other employees, family, friends and media apply online as in the real world.

- A. Protect confidential and proprietary information: Do not post confidential or proprietary information about SD1, its employees, management or Board of Directors. Adhere to all applicable SD1 privacy and confidentiality policies. Employees who share confidential information do so at the risk of disciplinary action or termination.
- B. Do not use SD1's logo for endorsements: Do not use SD1's logo on personal social media sites. Do not use SD1's name to promote a product, cause, or political party or candidate.
- C. Personal sites: Identify your views as your own. If you identify yourself as an SD1 employee online, it should be clear that the views expressed are not necessarily those of the organization.

4. E-mail and Records Management

E-mail messages are a form of business communication. They contain information about business activities which, like records in other formats, are subject to audit, open records requests, and legal processes such as discovery and subpoena. E-mail messages sent or received in the course of business transactions are public records and must be retained in accordance with the Retention Schedule or for longer if needed for administrative, fiscal, legal or historical requirements. Please refer to the SD1 Record Management Policy for further guidance on electronic messages.

5. Unacceptable Use

The following activities are prohibited. Employees may be exempted from these restrictions during the course of their legitimate job responsibilities.

Under no circumstances is an employee of SD1 authorized to engage in any activity that is illegal under local, state, federal or international law while utilizing SD1 owned or leased resources.

The lists below are by no means exhaustive, but attempt to provide a framework for activities which fall into the category of unacceptable use.

A. System and Network Activities

- i. Violations of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property, or similar laws or regulations. Examples include, but are not limited to: Using copyrighted material without consent of the copyright holder, digitization and distribution of photographs from magazines, books or other copyrighted sources, copyrighted music, and the installation of any copyrighted software for which SD1 does not have an active license.
- ii. Exporting software, technical information, encryption software or technology, in violation of international or regional export control laws, is illegal. The appropriate management should be consulted prior to export of any material that is in question.
- iii. Introduction of malicious programs into the network or any host (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.).
- iv. Revealing your account password to others or allowing use of your account by others. This includes other employees, family and other household members when work is being done at home.
- v. Using SD1 computing assets to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace laws in the user's local jurisdiction.
- vi. Making fraudulent offers of products, items, or services originating from any SD1 account.
- vii. Intentionally causing disruptions of network communication.
- viii. Port scanning or security scanning is expressly prohibited unless prior notification to the IT Department is made and permission is granted.
- ix. Executing any form of network monitoring which will intercept data not intended for the employee's host, unless this activity is a part of the employee's normal job/duty.

- x. Circumventing user authentication or security of any host, network or account.
- xi. Interfering with or denying service to any user other than the employee's host (for example, denial of service attack DOS attack).
- xii. Using any program/script/command, or sending messages of any kind, with the intent to interfere with, or disable, a user's terminal session, via any means, locally or via the Internet or Intranet.

B. E-mail and Communications Activities

- i. Sending unsolicited e-mail messages, including the sending of "junk mail" or other advertising material to individuals who did not specifically request such material (e-mail spam).
- ii. Any form of harassment via e-mail, telephone or paging, whether through language, frequency, or size of messages.
- iii. Forwarding SD1 information to a personal e-mail account.
- iv. Unauthorized use, or forging, of e-mail header information.
- v. Solicitation of e-mail for any other e-mail address, other than that of the poster's account, with the intent to harass or to collect replies.
- vi. Creating or forwarding "chain letters" and "pyramid" schemes of any type.

C. Software Usage

No software may be installed on SD1 computers that has not been purchased and/or licensed to SD1. In addition, no software may be installed on SD1 computers without prior knowledge of the SD1 IT department.

- It is illegal to use software for which we do not have a license.
- Installing software of unknown origin can cause a computer to become infected with malware, viruses, etc.
- Examples of unlicensed software include but are not limited to:
 - Any software installed on a local PC hard drive for which the user does not possess original manufacturer's documentation, license agreement, installation media or hardware lock. This includes programs that are legally licensed by SD1 for network usage (or stored there) but have been copied from the SD1 network to the PC hard drive by the user.
 - Commercial software purchased by the user for home use. These can include games, financial management packages, word processors, spreadsheets, graphics packages, utilities, etc.
 - "Shareware" programs available from online services or websites. Contrary to popular belief, these programs are not typically free for commercial uses and must be licensed after a short evaluation period.

SD1 computers and laptops are audited on a regular basis to ensure compliance with software license agreements.

D. Announced and Unannounced Network Outages

For maintenance, upgrades, and occasional network emergencies, it may become necessary for a production server to be taken offline. When possible, notifications will follow this schedule: 24-hour, 1-hour, and 10-minute and be in the form of an e-mail to potentially affected users. Users may be abruptly disconnected potentially losing work since their last save if they ignore warnings. In case of emergency, it may not be possible to issue network outage warnings.

The IT Department works diligently to ensure a safe and reliable computing environment. However, emergencies do occur and work that was not saved will be lost. As a user of the SD1 network, it is your duty to save your work often. **Note that local hard drives are never included in system backups (see Section IV, item 2G above).** The IT Department recommends saving your work at least every 15 minutes.

V. Enforcement

Any employee found to have violated this policy may be subject to disciplinary action up to and including termination of employment.

VI. Definitions

Term	Definition
<i>Host</i>	An electronic device that can be connected to a network (e.g. desktop computer, laptop computer, cell phone, PDA (Palm Pilot, iPAQ) or Blackberry.
<i>Spam</i>	Unauthorized and/or unsolicited electronic mass mailings.
<i>Chain Letter</i>	A letter, fax, or email directing recipients to send out multiple copies of same so that its circulation increases exponentially.
<i>Pyramid Scheme</i>	A pyramid scheme is a fraud based on recruiting an increasing number of investors.
<i>Virus</i>	A virus is a software program designed to infect, destroy or interfere with a computer or software program.
<i>Trojan Program</i>	A trojan, sometimes referred to as a trojan horse, is non-self-replicating malware that appears to perform a desirable function for the user but instead facilitates unauthorized access to the user's computer system. The term is derived from the Trojan Horse story in Greek mythology.

<i>Spyware</i>	Spyware is a type of malware that is installed on computers and collects little bits of information at a time about users without their knowledge. The presence of spyware is typically hidden from the user, and can be difficult to detect. Typically, spyware is secretly installed on the user's computer.
<i>Malware</i>	Malware, short for <i>malicious software</i> , is software designed to infiltrate a computer system without the owner's informed consent. The expression is a general term used by computer professionals to mean a variety of forms of hostile, intrusive, or annoying software or program code. Malware includes viruses, worms, trojan horses, spyware, dishonest adware, and other malicious and unwanted software.
<i>E-mail bomb</i>	A mail bomb is the sending of a massive amount of e-mail to a specific person or system. A huge amount of mail may simply fill up the recipient's disk space on the server or, in some cases, may be too much for a server to handle and may cause the server to stop functioning. Mail bombs not only inconvenience the intended target but they are also likely to inconvenience everybody using the server. Senders of mail bombs should be wary of exposing themselves to legal actions.
<i>Worm</i>	A computer worm is a self-replicating malware computer program. It uses a computer network to send copies of itself to other nodes (computers on the network) and it may do so without any user intervention. This is due to security shortcomings on the target computer. Unlike a virus, it does not need to attach itself to an existing program. Worms almost always cause at least some harm to the network, if only by consuming bandwidth, whereas viruses almost always corrupt or modify files on a targeted computer.

APPENDIX 2

Records Destruction Certificate

Volume Equivalent Chart

Records Transmittal to Archive

Outslip

Records Destruction Certificate
 Kentucky Department for Libraries and Archives, Public Records Division
 300 Coffee Tree Road, P.O. Box 537, Frankfort Kentucky 40602

Date:

Cabinet/Local Jurisdiction:

Department/Local Government Office:

Division:

Branch/Unit:

Schedule Date:

Destruction Date:

Destruction Method: Recycle

For records destroyed at agency only, per approved retention schedules

Series No.	Title of Records	Date Span	Volume <input type="checkbox"/> Cubic Feet <input type="checkbox"/> Megabytes <input type="checkbox"/>
Total Volume of Records Destroyed			

Approvals and Certifications

Before destroying records not listed on the agency's retention schedule or applicable general schedules, approval must be obtained from the State Archives and Records Commission.

I hereby certify that the records described above have been destroyed.

 Records Officer/Custodian

 Date

RECORDS DESTRUCTION CERTIFICATE INSTRUCTIONS

The Records Destruction Certificate is a fielded Microsoft Word form that should be used by Records Officers to document destruction of records at an agency. A printed copy of the completed and signed form should be sent to the Public Records Division.

Fill in the data on the Records Destruction Certificate (form PRD 50) as follows:

- **Date:** Enter the month, day, year the Certificate is prepared.
- **Cabinet/Local Jurisdiction:** Enter your agency's cabinet or local jurisdiction.
- **Department/Local Government Office:** Enter the name of department or local government office which falls under the entity listed above.
- **Division:** Name of division which falls under entity listed above.
- **Branch/Unit:** Name of branch or unit which falls under entity listed above.
- **Schedule Date:** The month and year the current Records Retention Schedule for your agency was approved by the State Archives and Records Commission. This information can be found on the signature page which accompanies the retention schedule or the top right-hand side of an individual schedule page.
- **Destruction Date:** Indicate the date the records were disposed of.
- **Destruction Method:** Indicate the method used to dispose of the records, i.e., landfill, trash, recycle, shred, etc. using the pull down menu.
- **Series No.:** Enter the series number from your agency's Records Retention Schedule or applicable general schedules for the record(s) you are destroying. Multiple series can be recorded on the Destruction Certificate.
- **Title Records:** Enter the title of the record(s) exactly as shown in your agency's Records Retention Schedule, or the General Schedule for State Agencies.
- **Date Span:** Give the inclusive (oldest and most recent) dates of the records destroyed.
- **Volume:** Indicate the amount of each series of records destroyed. This may be in cubic feet (if the records are in paper format), megabytes (if the records are in digital format), or some other unit of measure (for other formats). If the records are in other formats, click the box next to the empty field and complete that field.
- **Total Volume of Records Destroyed:** Enter the total volume of records destroyed.
- **Approvals and Certifications:** Agency Records Officer or records custodian signs and dates the form, certifying destruction of records.

Forward the original signed copy of the Records Destruction Certificate, plus one photocopy, to either the State Records Branch (if it is a state record) or the Local Records branch (if it is a local record) of the Public Records Division, 300 Coffee Tree Road, P.O. Box 537, Frankfort, Kentucky, 40602. Retain one paper or electronic copy for your agency's files.

Volume Equivalent Chart

<u>Containers</u>	<u>Cubic Feet</u>
Small Banker Box	1
Large Banker Box	2
Standard File Drawer	2

Records Transmittal to Archive

Destruction Date: _____
(Month/Year)

Department: _____ Today's Date: _____ Pick up Date: _____

Person Sending Records: _____ Permanent File: No _____ Yes _____

IS ACCESS TO THESE RECORDS RESTRICTED? Yes ____, No ____ . IF YES, CITE AUTHORITY. _____

Box No. (1 of 10)	Series No.	Title of Records, Exactly as listed on Retention Schedule	Date Span of Records in each Series
-------------------	------------	---	-------------------------------------

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Records Transmittal to Archive

Destruction Date: _____
(Month/Year)

Department: _____ Today's Date: _____ Pick up Date: _____

Person Sending Records: _____ Permanent File: No _____ Yes _____

IS ACCESS TO THESE RECORDS RESTRICTED? Yes ____, No ____ . IF YES, CITE AUTHORITY. _____

Box No. (1 of 10)	Series No.	Title of Records, Exactly as listed on Retention Schedule	Date Span of Records in each Series
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Records Transmittal to Archive

Destruction Date: _____
(Month/Year)

Department: _____ Today's Date: _____ Pick up Date: _____

Person Sending Records: _____ Permanent File: No _____ Yes _____

IS ACCESS TO THESE RECORDS RESTRICTED? Yes ____, No ____ . IF YES, CITE AUTHORITY. _____

Box No. (1 of 10)	Series No.	Title of Records, Exactly as listed on Retention Schedule	Date Span of Records in each Series
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APPENDIX 3

Open Records Policy

Request to Inspect Public Records

SANITATION DISTRICT NO. 1 OPEN RECORDS POLICY

I. Purpose

Pursuant to KRS 61.870 to 61.884, SD1 is adopting the following policy to:

- Provide full access to public records
- Protect public records from damage and disorganization
- Prevent excessive disruption of its essential functions
- Provide assistance and information upon request
- Insure efficient and timely action in response to application for inspection

II. Scope

This policy applies to all employees and all public records, regardless of format.

III. Principal Office of SD1/Regular Office Hours

SD1's main office is located at 1045 Eaton Drive, Ft. Wright, Kentucky 41017. Regular office hours are 8:00 a.m. to 4:30 p.m., Monday through Friday, except holidays and emergency closing.

IV. Official Custodian of Records

The SD1 General Manager is the Official Custodian of Records for SD1 pursuant to KRS 61.870(5). Contact address is 1045 Eaton Drive, Ft. Wright, Kentucky 41017.

V. Fees for Reproduction of Requested Records for Noncommercial Purposes

1. Those seeking public records may be charged only the actual cost of copies not including cost of staff required to make the copies.
2. Copies of written material, maps, photos sized 8½ x 11 – 11x17 shall be furnished upon request for a fee of ten cents (\$0.10) per page.
3. Copies of non-written records (photographs, maps, material stored in computer files or videos, etc.) shall be furnished upon request for a fee based on the actual cost of producing copies of such records.
4. Copies of larger maps measuring over 11x17 are two dollars and fifty cents (\$2.50) each.
5. If records are requested to be mailed, there will be a charge for the actual cost of postage and mailing supplies.

VII. Application to Inspect Open Records

1. Application must be made in writing to the official custodian. The form for the inspection of the public records is attached and is also available at the main office front desk and on the website at www.sd1.org. The form will also be furnished upon request via e-mail or U.S. mail. Assistance in completing the application form will be provided by an SD1 employee upon request.
2. The person requesting records must do so with sufficient clarity to allow SD1 to identify, retrieve and review the records.

VIII. Response to Request to Inspect Open Records

1. SD1 will respond to the application:
 - a. In writing;
 - b. To the person making the request; and
 - c. Within three (3) days after the date of receipt of the written application (excepting Saturdays, Sundays, and legal holidays).
2. The response will include:
 - a. SD1's statement of whether it will comply with the request for inspection;
 - b. SD1's statement, if inspection of any or all of the requested public records is denied, of the specific exception authorizing the withholding of the record withheld, and a brief explanation of how the exception applies to the record(s) withheld;
 - c. The response shall designate a place, time, and date for inspection of the public record(s) not to exceed three (3) work days after the date of receipt of the written application. Inspection may be delayed if a detailed explanation of the cause for the delay is given and the place, time, and earliest date on which the public record will be available for inspection is stated.
3. The response shall be issued by the official custodian or under her authority.
4. If requested records do not exist or cannot be located, SD1 shall specifically indicate the fact to the person who has requested the records and indicate what steps were taken to locate the record.
5. The public agency is not obligated to create records to satisfy a particular open records request.

IX. Copying of Open Records

1. No person shall remove the originals of public records from the office of SD1.
2. The applicant has the right to make abstracts and memoranda of the public records that are inspected.
3. The applicant has the right to obtain copies of:
 - a. All public records not exempted by the terms of KRS 61.878.
 - b. Public records other than written records if such duplication will not damage or alter the records.
4. SD1 may require advance payment of the prescribed fee, including postage where appropriate, when copies are requested.
5. SD1 may require the applicant to appear in person to inspect the public records before supplying copies of the records if the applicant's residence or principal place of business is in Kenton County, Kentucky.

X. Exceptions to Right of Inspection

The official custodian may refuse to permit inspection of public records, or mail copies thereof, if:

1. The application places an unreasonable burden in producing public records, if supported by clear and convincing evidence.
2. The custodian has reason to believe that repeated requests are intended to disrupt other essential functions of the public agency, if supported by clear and convincing evidence.

3. The Open Records Act permits a public agency to withhold certain records from a requester unless the requester obtains a court order directing their release. The exemptions are located at KRS 61.878(1) and include:
 - a. Records containing information of a personal nature if disclosure would constitute a clearly unwarranted invasion of personal privacy.
 - b. Records confidentially disclosed to an agency and compiled and maintained for scientific research.
 - c. Records confidentially disclosed to an agency or required by the agency to be disclosed to it which are generally recognized as confidential or proprietary and which if disclosed would permit an unfair commercial advantage to competitors, including records which are compiled and maintained in conjunction with an application for or the administration of a loan or grant; the application for or the administration of assessments, incentives, inducements, or tax credits; or the regulation of a commercial enterprise.
 - d. Records that relate to the prospective locations of a business or industry which has not previously disclosed that it is interested in locating, relocating, or expanding in Kentucky.
 - e. Real estate appraisals, engineering or feasibility estimates, and evaluations made by or for a public agency in the course of acquiring property, until all of the property has been acquired.
 - f. Preliminary documents, including drafts, notes, and correspondence with private individuals, recommendations, and memoranda in which opinions are expressed or policies formulated.
 - g. Public records that are prohibited from disclosure by state or federal law.
 - h. When disclosure of such records would have reasonable likelihood of threatening the public safety by exposing a vulnerability in preventing, protecting against, mitigating, or responding to a terrorist act, as defined in the exemption, and limited to eight precisely described categories of records.

XI. Failure to Inspect Available Records

1. If the requester fails to inspect documents within thirty (30) days from the date the requester receives notice that documents are available for inspection, SD1 will return the records to their custodian(s) to be re-filed in their normal storage location and the request will be considered closed.
2. If a subsequent request for the same records is made by the same person, the subsequent request will be considered an attempt to disrupt other essential functions of SD1, and SD1 may refuse to permit inspection of the public records or mail copies thereof.

SANITATION DISTRICT NO. 1
REQUEST TO INSPECT PUBLIC RECORDS
(KRS Chapter 61)

1. I request to inspect the following document(s) for the dates between _____ and _____ (please be as specific as possible): _____

2. Number of copies of each document requested: _____
(Note: If hard copy requested/provided, cost is \$0.10/pg, \$2.00/pg for maps and large format copies. There will be no charge for electronic copies sent via e-mail. If request totals under \$5.00, there will be no charge. Requests over \$5.00 will be invoiced.)

3. Name: _____ (please print clearly)
Company: _____
Address: _____

Phone: _____
E-mail: _____

4. I would like the records provided in the following format:
_____ Electronic (CD or via e-mail)
_____ Hard copy

Delivery:

_____ Will pick up (will notify when records are ready)
_____ Please mail (I agree to pay postage costs, please initial: _____)
_____ Send via e-mail (be sure e-mail address is provided above)

5. Will records be used for commercial use? Yes _____ No _____

6. If answer to question 5 is yes, please state the commercial purpose for which the requested information shall be used: _____

I hereby certify that the information set forth in item 6 is true and correct to the best of my knowledge:

Signature: _____ Date: _____

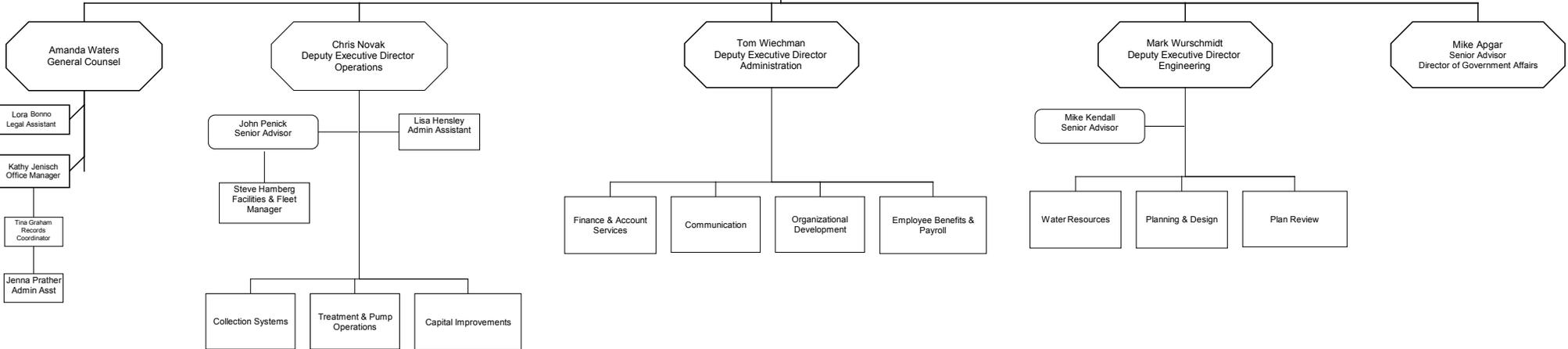
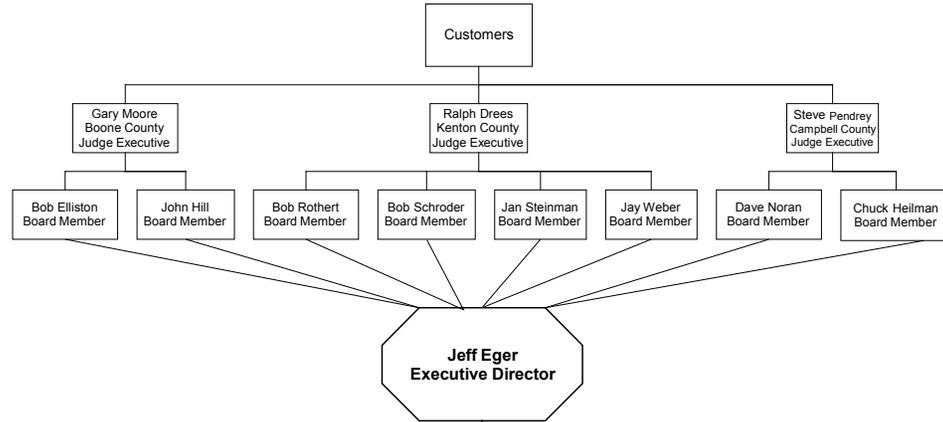
DISPOSITION

The following disposition was made of the above request: _____

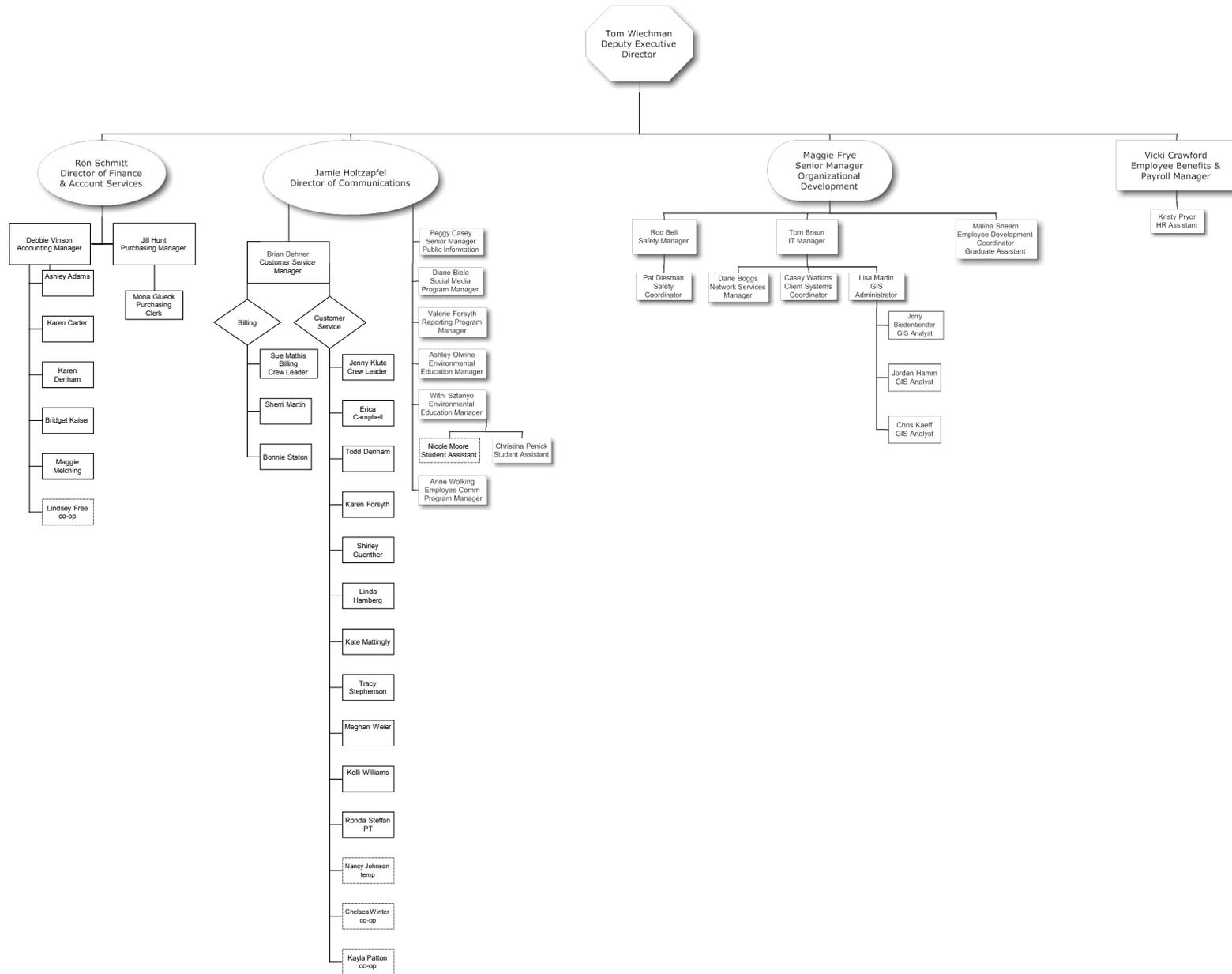
Signature of SD1 Custodian: _____ Date: _____

APPENDIX I:
Organizational Charts

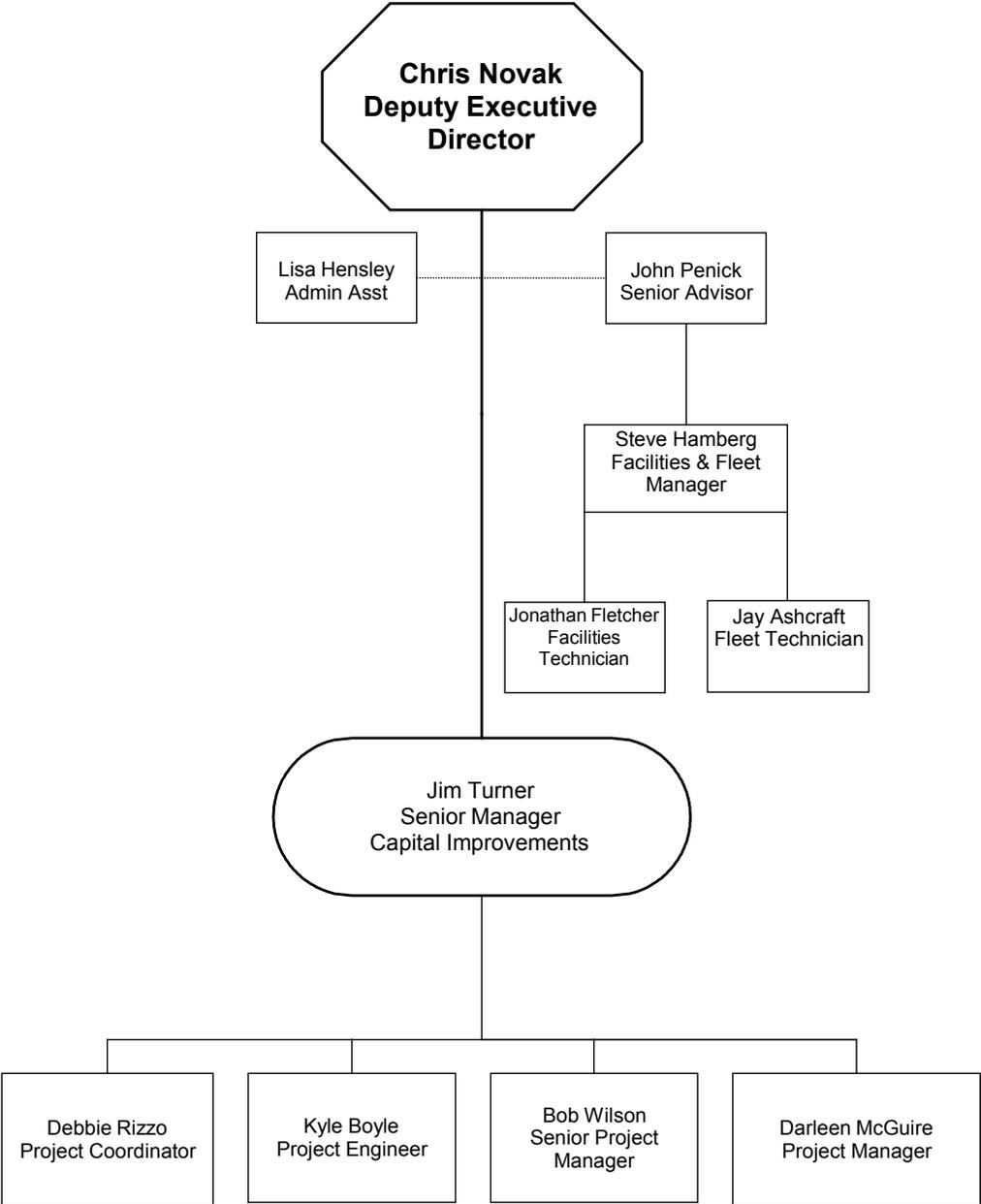
**SD1
Overall Structure & Direct
Report to Executive Director**



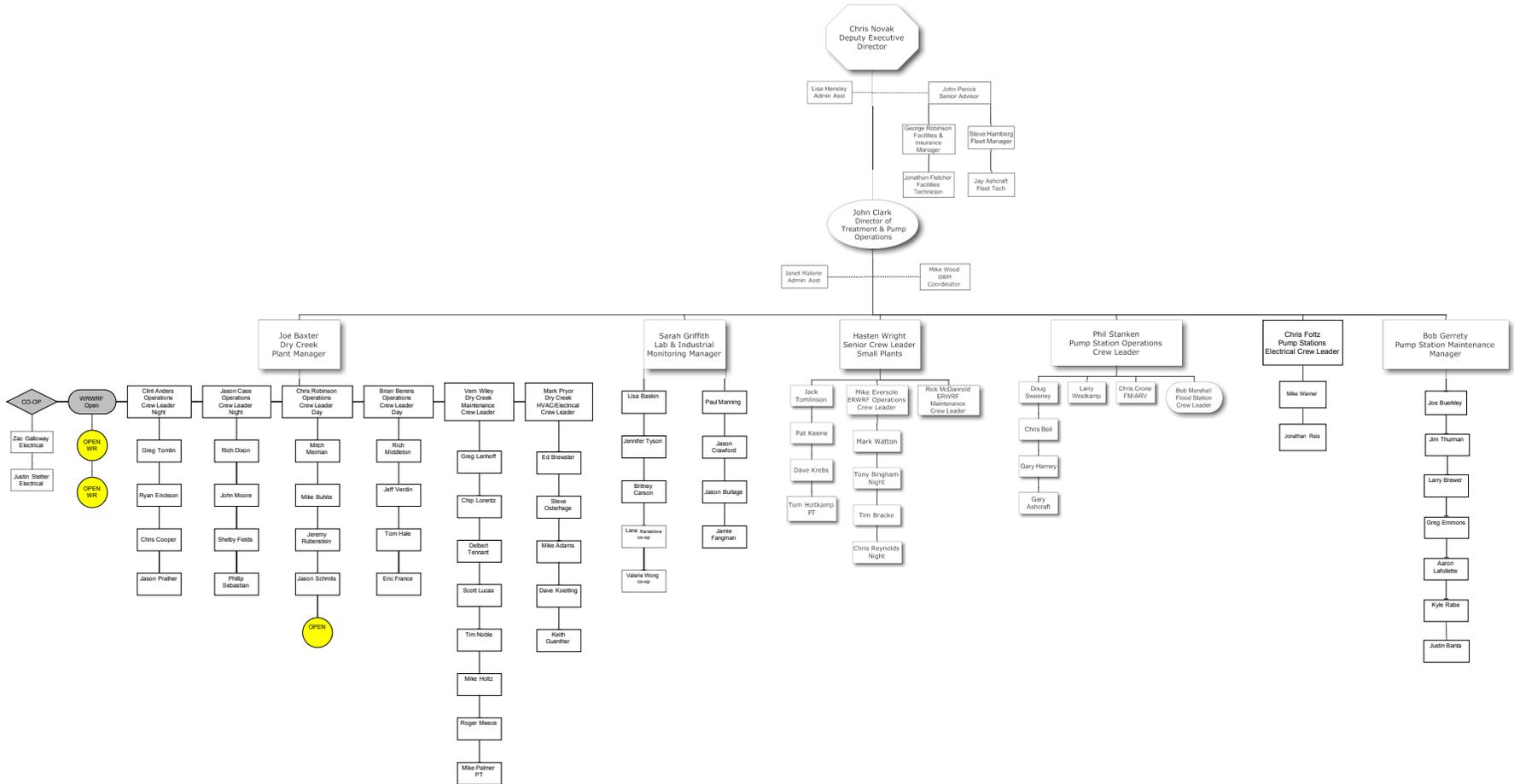
SD1 Administration



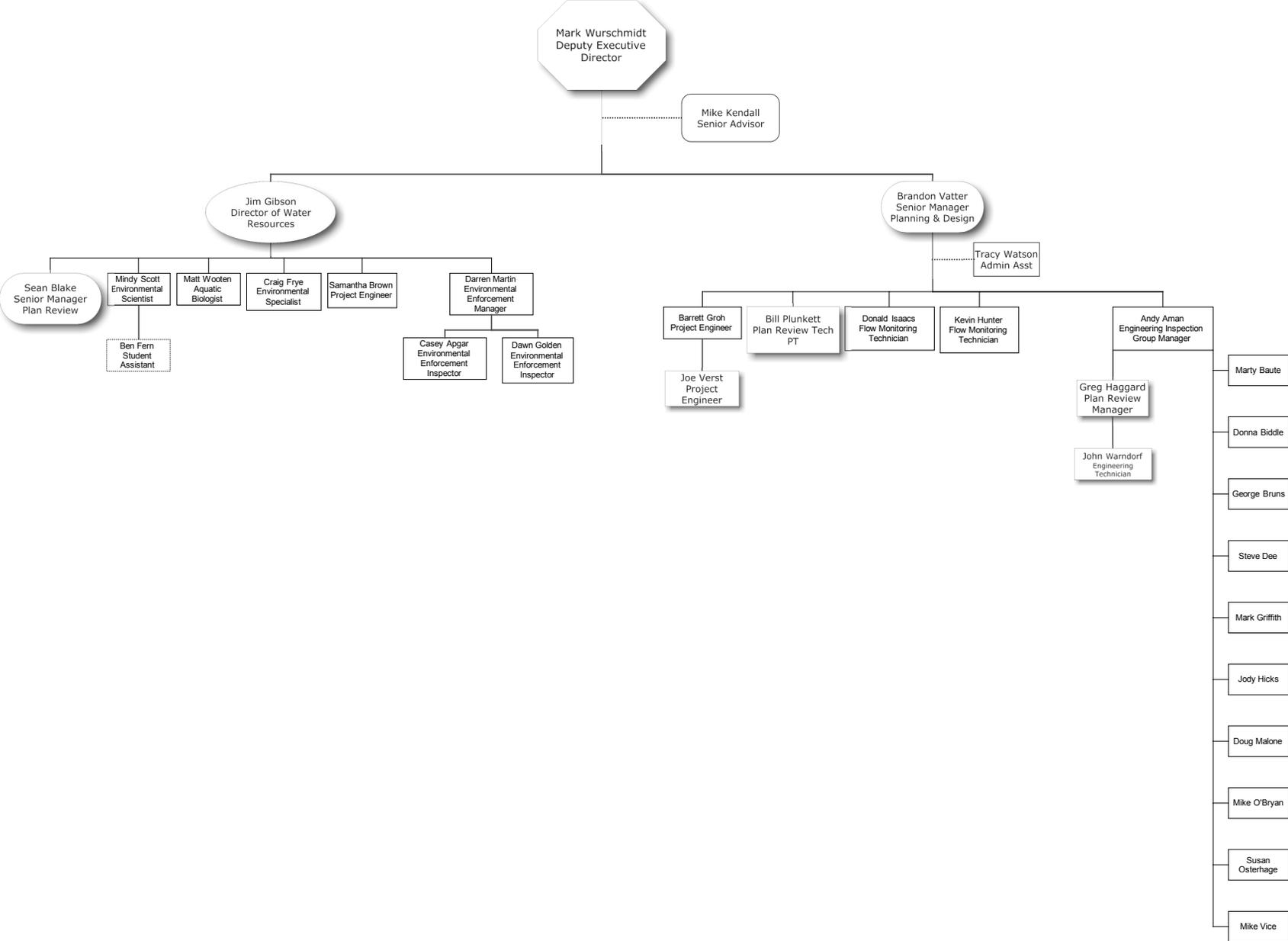
**SD1
Operations:
Capital Improvements**



SD1 Operations: Treatment & Pump Operations



SD1 Engineering



APPENDIX J:
FY 2010 Safety Training Catalog

SD1



Fiscal Year 2010 Safety Training Schedule and Calendar of Events

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In order to ensure the overall health and safety of each SD1 employee and to satisfy the requirements of SD1, the training described and assigned in this document has been chosen based on job hazard analyses performed as required by OSHA Standards Parts 1910 (General Industry) and 1926 (Construction Industry) as adapted and promulgated by Kentucky Revised Statute Chapter 338

This document is intended to be used as a planning tool as well as a source of information for individual employees to ensure that each are aware of the safety training expectations held by SD1 concerning various positions, job descriptions, and certification requirements.

This calendar includes, but is not limited to:

- Courses offered
- Course elements
- Class Dates
- Class duration and size limits
- Descriptions of job categories that have required safety training
- SD1 Instructors and Subject Matter Experts

Chris Beil	Forklift
Hazard Communication	Office Safety
Traffic	Contract Employer Responsibilities
Rod Bell	Fire Safety Emergency Action Planning
Electrical Safety	Swift Water Awareness
Hazard Communication	Scaffolding and Ladders / Powered Platforms
Permit Required Confined Space Entry Rescue	Excavation / Trenching Safety
Traffic	Chris Foltz
Forklift	Electrical Safety
Office Safety	John Halpin
Contract Employer Responsibilities	First Aid
Fire Safety Emergency Action Planning	Traffic
Swift Water Awareness	Donald Isaacs
Scaffolding and Ladders / Powered Platforms	Permit Required Confined Space Entry Rescue
Hazardous Waste Operations and Emergency Response:	Dennis Kindoll
Operations Level	Traffic
Excavation / Trenching Safety	Forklift
Brian Berens	Excavation / Trenching Safety
First Aid	Dugan Knight
Hazard Communication	Forklift
Swift Water Awareness	(open)
Permit Required Confined Space Entry Rescue	Hazard Communication
Scott Breeze	Brian Moore
Excavation / Trenching Safety	Fire Safety Emergency Action Planning
George Bruns	Steve Osterhage
Permit Required Confined Space Entry Rescue	Electrical Safety
Fire Safety Emergency Action Planning	Donnie Roberts
Josh Campbell	Permit Required Confined Space Entry Rescue
Fire Safety Emergency Action Planning	Vern Wiley
Donnie Couch	Hazard Communication
First Aid	Swift Water Awareness
Permit Required Confined Space Entry Rescue	Permit Required Confined Space Entry Rescue
Fire Safety Emergency Action Planning	Scaffolding and Ladders / Powered Platforms
Jason Crawford	
Hazard Communication	
Pat Diesman	
First Aid	
Electrical Safety	
Hazard Communication	
Permit Required Confined Space Entry Rescue	
Traffic	

-
- Supervisors will be required to independently complete online NIMS Training Courses 100 and 700;
 - The following training/tests are administered at the St. Elizabeth Business Health Center and are scheduled on an as-needed and/or when-required basis. These events are for designated employees with occupational exposure:
 - Pulmonary Function Test, Respirator Fit Testing/Training, and Audiometric Testing/Training;
 - Department of Transportation Random Drug and Alcohol Screening;
 - Department of Transportation Physical Certification;
 - Department of Transportation Reasonable Suspicion Drug and Alcohol Screening;
 - Other Medical Screening as required.
 - The training schedule for the Sanitation District No.1 Emergency Response Team (SD1ERT) is subject to the schedule(s) of the Northern Kentucky Technical Rescue Team, the Northern Kentucky Hazardous Materials Response Team, and the Greater Cincinnati Hazardous Materials Response Team. Because 2010 training schedules for these organizations have not yet been released, the SD1ERT schedule will be announced on a later date.
 - The following classes (and any other additional classes) are not listed. However, as much advance notice as possible will be given:
 - WINNs Grant Training – Gateway Community College
 - OSHA 10 hour Construction and General Industry Safety Standards for Designated Subject Matter Experts

Red Text = SD1 General

Blue Text = SD1 General Make-Up

Green Text = ERT and other Specialized Training for Designated Employees based upon Job Hazard Analysis

Safety Department Mission Statement

The Sanitation District Safety Department believes in an employee based, proactive safety program.

*Our belief is that our safety initiative should be based on the following principles:
Responsibility, Accountability, Involvement, and Employee Ownership at all levels.*

Our goal is to provide the Sanitation District with technical support and services that are related to compliance at all levels: Safety, Health, and our Environmental Responsibilities.

We are responsible and accountable for the well being of our employees, our communities, and the equipment to which we work with. We promote a work environment that is safe and free from all known and recognized hazards.

We based our program on a management philosophy that our employees are our most valuable assets.

Our goal is to provide our employees the necessary leadership for compliance training, education, equipment, and administrative support with service.

June 8th – June 12th
Make-up: June 24th

- - Vehicle Housekeeping
 - Accident Prevention: Signs & Tags
 - Removal From Service - Lockout /Tag Out
- 4.0 hours
- - - Operations (Designated Operators)
 - Maintenance (Designated Operators)
 - Field Technical Services
 - Operations (Designated Operators)
 - Maintenance (Designated Operators)
 - - Customer Service (Designated Operators)
 - Construction (Designated Operators)
 - - Safety (Designated Operators)
 - Facilities (Designated Operators)
 - - Flow Monitoring (Designated Operators)
 - Inspectors (Designated Operators)
 - Storm Water - Illicit Discharge (Designated Operators)
-

August 28th

- - Understanding Hazards
 - Accident Prevention: Signs & Tags
 - Locations Found
 - Working Around
 - Rescue
 - Throw Ropes
 - Life Rings
 - Personal Flotation Devices
 - Personal Protective Equipment
- 4.0 hours
- annually
- - - Facilities
 - - Flow Monitoring
 - Storm Water - Illicit Discharge
 -
-



October 12th through October 16th
Make-up October 21st and October 23rd

- - Portable Fire Extinguishers
 - Personal Protective Equipment
 - Accident Prevention: Signs & Tags
 - Emergency action plan – Egress - Exit
 - Employee alarm systems
 - Fire detection systems
 - Emergency action and notification plan
 - National Incident Management System
 - Emergency communication
 - Fire prevention
 - Flammable and combustible storage
- 2 hours
- annually
- -
 -
 -
 -
-

November 9th through November 11th
Make-up: November 18th

- - Trench and Shoring
 - Personal Protective Equipment
 - Accident Prevention: Signs & Tags
 - Call before you dig
 - Underground lines – Color Coding
 - Overhead lines
 - Rescue Notification Awareness
 - Public Safety
 - Housekeeping
 - Slips / Trips / Falls
 - Ladder Safety
 - Contract Employer Responsibilities
 - Some atmospheric monitoring
 - Traffic Control / Excavation Permit
 - Record Keeping
 - Hot Work Permit – Flammable / Spark Producing
 - Atmospheric Sampling – Confined Space
 - Cold Weather Training

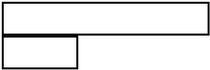
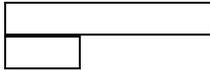
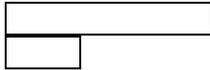
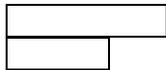
- 6 hours

- annually

- - - Construction
 - - Inspectors
 - Project Managers
 -

-

November

November						
						
						
						

December 8th and December 10th
Make-up: December 16th

- - Chemical Protective Clothing & Levels of Protection
 - Chemical Profiling (MSDS)
 - Air Monitoring (AMI) Overview
 - Spill Control and Containment (SPCC)
 - Emergency Response Guide (current edition)
 - NIOSH
 - CAMEO
- 4 hours
- annually
- - - Maintenance
 - Operations
 - Industrial Monitoring
 - Certified Pesticide Applicators
 - Field Technical Services
 - Operations
 - Certified Pesticide Applicators
 - - Facilities
 - Certified Pesticide Applicators
 - - Stormwater – Illicit Discharge
 - SD1 Emergency Response Team Members
-

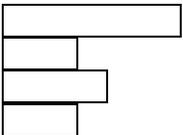
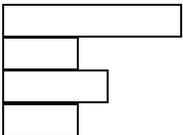
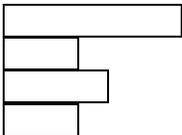
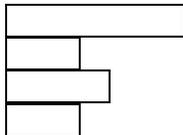
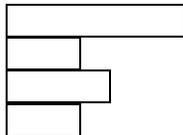
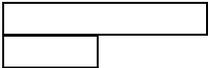
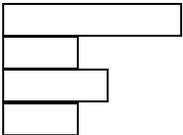
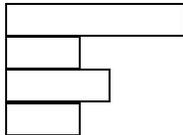
January 11th through 15th
Make-up: January 26th and 28th

January 11th through 15th
Make-up: January 26th and 28th

-
- - Adult CPR with AED
 - Bloodborne Pathogens
 - Personal Protective Equipment
 - Myclyns Wound Sanitizer
 - : 6 hours
 - annually
 - - Any employee who is one of the following:
 - Confined Space Entry Qualified
 - Electricians
 - Emergency Response Team
 - Emergency Action Plan (EAP) Designated First Responders (plant and office)
 - : 20

-
- - Adult First Aid
 - Bloodborne Pathogens
 - Personal Protective Equipment
 - 2 hours
 - every 3 years, offered annually
 - - Any employee who is one of the following:
 - Confined Space Entry Qualified
 - Electricians
 - Emergency Response Team
 - Emergency Action Plan (EAP) Designated First Responders (plant and office)
 - 40

January

February 8th through 12th
Make-up: February 23rd and 24th

-
- - Traffic control / Excavation Permit
 - Record Keeping
 - Flagging
 - Signaling
 - Hot Weather Training
 - Work Zone Setup
 - Signs
 - Accident Prevention: Signs & Tags
 - Changing Conditions
 - Short-term v/s Long-term
 - Speed Classification
 - Personal Protective Equipment (employees to bring equipment for audit)

 - - 8.0 hrs. for regular class (even numbered years)
 - 4.0 hrs. for update class (odd numbered years)

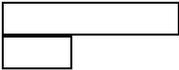
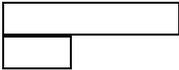
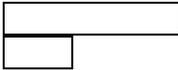
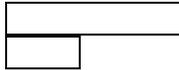
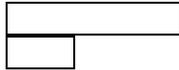
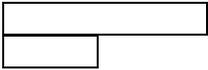
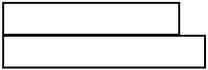
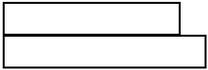
 - - Semi-annually

 - Any employee who is one of the following:

 - Dry Creek – Designated Personnel
 - Electricians
 - Collection Systems Construction and Customer Service
 - Flow Monitoring
 - Engineering Inspectors
 - Emergency Response Team
 - Inmate supervisors

 -

February

March 8th through March 12th
Make-up: March 23rd and March 25th

March 8th through March 12th
Make-up: March 23rd and March 25th

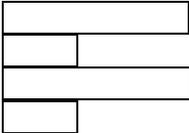
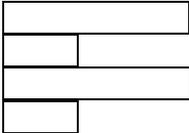
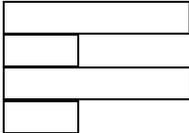
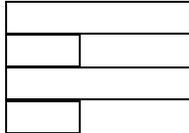
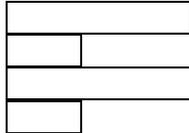
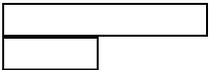
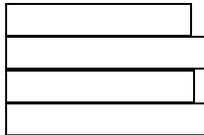
-
- - Lockout / Tagout Program
 - Housekeeping
 - Personal Protective Equipment
 - 1.0 hr.
 - annually
 - - - Operations
 - Maintenance
 - Small Plants
 - Eastern Regional WRF
 - Field Technical Services
 - Operations
 - Maintenance
 - - Customer Service
 - Construction
 -

-
- - Assured Grounding
 - Arc Flash NFPA 70E (overview)
 - Housekeeping
 - Personal Protective Equipment
 - Accident Prevention: Signs & Tags
 - Lockout / Tagout (overview)
 - 3.0 hrs.
 - annually
 -
 -

Any employee who is one of the following:

- Electricians and Maintenance personnel. Also Operations personnel who completed electronics or electrical components training (WINNS grant training at Gateway Community College)

March

_____ April 12th through April 16th
Make-up: April 27th and 29th

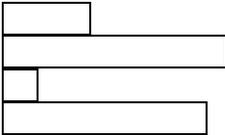
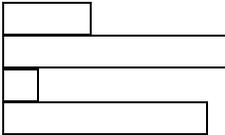
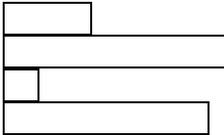
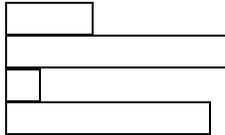
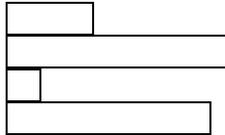
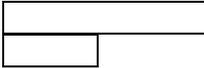
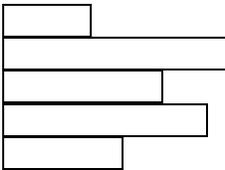
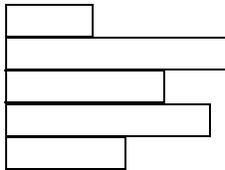
_____ April 12th through April 16th
Make-up: April 27th and 29th

-
- - Damming and Dykes
 - Safe Handling of Hazardous Chemicals
 - Accident prevention/housekeeping
 - Material Safety Data Sheets / Locations
 - Temporary Use Containers
 - Personal Protective Equipment
 - Accident Prevention: Signs & Tags
 - Housekeeping
 - Storage of Flammable and Combustible Liquids
 - Spill Prevention Control & Countermeasures & Storm Water Pollution Prevention Plan Kit Locations
 - Understanding National Fire Protection Association Hazard Recognition Labels
 - 2.0 hrs.
 - annually
 - Any employee who is one of the following:

 - - Operations, Maintenance, Lab / Industrial Monitoring, Small Plants
 - Eastern Regional WRF
 - Field Technical Services – Operations and Maintenance
 - - Customer Service
 - Construction
 - - Safety and Facilities
 - - Flow Monitoring
 -

-
- - Safe Handling of Hazardous Chemicals
 - Accident prevention
 - Material Safety Data Sheets / Locations
 - Temporary Use Containers
 - Personal Protective Equipment
 - Accident Prevention: Signs & Tags
 - Housekeeping
 - Storage of Flammable and Combustible Liquids
 - Understanding National Fire Protection Association Hazard Recognition Labels
 - 1.0 hrs.
 - annually
 - - - Lab / Industrial Monitoring
 -

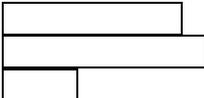
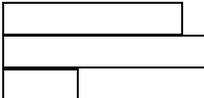
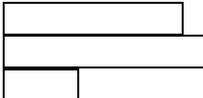
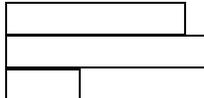
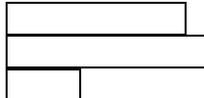
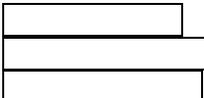
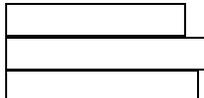
April

May 10th through May 14th
Make-up: May 25th and May 27th

- - Confined space – permit required Program
 - Fall protection / fall prevention
 - iTX atmospheric monitoring
 - Personal Protective Equipment
 - Accident Prevention: Signs & Tags
 - Lock-out / Tag-out
 - Hazard Communication
 - Entry Equipment - Simulator
 - Communication
 - Rescue/SKED
 - Permit Required Confined Space Forms
 - Self Contained Breathing Apparatus /Supplied Air Respirator
 - Ventilation
 - Open Surface Tanks
 - Personal Protection
 - Entry/Dispatch
 - Hot Work Permit
 - Emergency Rescue Permit
 - Compressed Gasses
 - Housekeeping
 - Traffic Control / Flagger
- 8.0 hrs.
- annually
- - - Operations
 - Maintenance
 - Lab / Industrial Monitoring
 - Eastern Regional WRF
 - Field Technical Services
 - Operations
 - Maintenance
 - - Customer Service
 - Construction
 - - Safety
 - - Flow Monitoring
 - Inspectors
 - Storm Water - Illicit Discharge
-

May

June 7th through 11th
Make-up: June 22nd and June 24th

June 7th through 11th
Make-up: June 22nd and June 24th

-
- - Mobile
 - Stationary
 - Fixed
 - Cable Inspection
 - Slings (Chain, Webbed, Wire Rope)
 - Signaling - Hand Signals
 - Overhead Line Safety
 - Personal Protective Equipment
 - Accident Prevention: Signs & Tags
 - Periodic / Annual Inspection
 - Record Keeping
- 4.0 hrs.
 - annually
 - - - Operations
 - Maintenance
 - Eastern Regional WRF
 - Field Technical Services
 - Operations
 - Maintenance
 - - - Construction
-

-
- - Fall Protection and Prevention
 - Personal Protective Equipment
 - Accident Prevention: Signs & Tags
 - Set-Up
 - Walking/Working Surfaces
 - Ladder Securing / Safety
 - Housekeeping
 - Inspection
- 3.0 hrs.
 - annually
 - - - Operations
 - Maintenance
 - Field Technical Services
 - Maintenance
 - - - Construction

APPENDIX K:
2010 Training Calendar

2009–2010 Training Calendar

August 2009

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

September 2009

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

October 2009

S	M	T	W	T	F	S
						3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

November 2009

S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

December 2009

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

January 2010

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

February 2010

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

March 2010

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

April 2010

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	

May 2010

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

June 2010

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

July 2010

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31



*Protecting the Environment
Safeguarding Public Health*

Address:

1045 Eaton Drive
Ft. Wright, KY 41018

Contact Information:

Phone: 859-547-1660

Fax: 859-578-7453

E-mail: awolking@sd1.org

Schedule of Events

Leadership Skills

8/11/09 Location: 2B
8/20/09 Location: Dry Creek
2/9/10 Location: 2B
2/16/10 Location: Dry Creek

Change

9/15/09 Location: 2B
9/22/09 Location: Dry Creek
3/9/10 Location: 2B
3/16/10 Location: Dry Creek

Attitude

9/17/09 Location: 2B
9/24/09 Location: Dry Creek
3/11/10 Location: 2B
3/18/10 Location: Dry Creek

Motivation in the Workplace

10/13/09 Location: 2B
10/20/09 Location: Dry Creek
4/13/10 Location: 2B
4/20/10 Location: Dry Creek

Conflict

11/10/09 Location: 2B
11/19/09 Location: Dry Creek
5/11/10 Location: 2B
5/18/10 Location: Dry Creek

Time Management

11/12/09 Location: 2B
11/24/09 Location: Dry Creek
5/13/10 Location: 2B
5/20/10 Location: Dry Creek

Presentation Skills

12/15/09 Location: 2B
12/17/09 Location: Dry Creek
6/15/10 Location: 2B
6/22/10 Location: Dry Creek

Effective Communication

1/12/10 Location: 2B
1/19/10 Location: Dry Creek
7/13/10 Location: 2B
7/20/10 Location: Dry Creek

Team Building

1/14/10 Location: 2B
1/21/10 Location: Dry Creek
7/15/10 Location: 2B
7/22/10 Location: Dry Creek

Classes will begin promptly at 8 am and will last 1-hour

Blue—Trainings held at Main Office

Green—Trainings held at Dry Creek

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APPENDIX L:

Grease Control Program – Phase 1, 2 & 3 Updates

Grease Control Program Phased Implementation Plan Schedule

Actions	Phase 1 (12 months)	Phase 2 (12 months)	Phase 3 (12 months)	Phase 4 (12 months)
Conduct Self Assessment				
Review Rules and Regulation/Enforcement Design Criteria				
FSE Education				
Public Education				
Compile Data from Self Assessment				
Revise Rules and Regulation/Enforcement Response Plan				
Develop Inspection Protocol				
Approval for Rules and Regulations/Enforcement Response Plan				
Modify Food Service Discharge Permit				
Revise Domestic Holding Tank Waste Hauler Manifest				
Evaluate Staffing and Equipment Requirements				
Public Reading for Rules and Regulation/Enforcement Response Plan				
Permitting				
Performance Indicators				

Shaded areas indicate actions being performed in phase.

*Phase 1 commenced upon Cabinet/EPA's joint approval of SD1's Grease Control Program, which occurred on January 8, 2008.

Grease Control Program: Phased Implementation Tasks

Category	Task	Status/Activity
Grease Control Phase 1 Tasks / Completed January 2008 - January 2009		
Conduct Self Assessment	SD1 will acquire a list of FSEs within the service area that are permitted by the Kentucky Health Department. This will aid in determining the magnitude of FSEs that have the potential to discharge FOG to the SSS. This information will also help establish mailing addresses and points of contact for the FSEs.	Complete
	Field crew personnel currently determine when collection system problems are caused by FOG during a trouble call. This process will be evaluated to determine if the causes of trouble calls are being classified accurately.	Complete
	Field crew personnel enter trouble call evaluations into GBA. The process of entering information into GBA will be evaluated to ensure data is accurate, accessible and manageable.	Complete
	SD1 currently uses a geographical information mapping system called Arc Viewer. One of the primary functions of Arc Viewer is to show the locations of sanitary sewer lines in the service area. This system will be evaluated to find possible mapping capabilities for areas with FOG problems within the collection system.	Complete
Review Rules and Regulation / Enforcement Response Plan	A review of the SD1's Rules and Regulations and ERP is being conducted. This review will identify any deficiencies in the legal authority to control the discharge of grease into the SSS. It will also identify deficiencies in the enforcement program. If found, the deficiencies will indicate revisions to be made in Phase 2 of this program.	Complete
Design Criteria	SD1 will review the effectiveness of other publicly owned treatment works (POTWs) Rules and Regulations and ERPs (i.e. Cincinnati MSD, Louisville MSD, and Knoxville Utilities Board). This will provide insight into what is working for utilities in the surrounding area.	Complete
	SD1 will seek the development of design criteria for grease reduction device standards by the Kentucky Division of Plumbing, Kentucky Health Department and Kentucky Environmental and Public Protection Cabinet.	Complete

Grease Control Program: Phased Implementation Tasks

Category	Task	Status/Activity
Grease Control Phase 1 Tasks (Continued) / Completed January 2008 - January 2009		
FSE Education	Over the last year, SD1 has created and distributed BMP posters to be displayed in permitted FSEs and will continue to distribute such posters. The FSEs are required to display these posters in areas where there is potential for FOG to be discharged to the SSS.	Complete
	SD1 will create and send out BMP brochures to all FSEs. The brochure will focus on the harmful effects of FOG in sewer lines and proper grease handling techniques used to minimize the release of FOG into the collection system. These brochures can also be distributed during site visits.	Complete
	SD1 will begin researching a compliance assistance workshop for FSEs. An evaluation of other FOG workshops will be conducted to determine content and effectiveness. This workshop will provide FSEs with a comprehensive overview of the Grease Control Program. The workshop will be initiated when all specifics of the program have been established.	Complete
FSE Education	SD1 has met with members of the Kentucky Restaurant Association (KRA) and the Northern Kentucky Restaurant Association (NKRA) to open channels of communication with key stakeholders. SD1 will continue to work to educate these key stakeholders. Their participation and cooperation is valuable. We will encourage the KRA and NKRA to include grease control program information in their newsletters.	Complete
Public Education	Over the last year, SD1 has created and distributed door hangers to inform customers when there has been a blockage or obstruction due to FOG in their area. These informational pieces focus on the harmful effects of FOG in sewer lines and proper grease handling techniques used to minimize the release of FOG into the collection system. SD1 will continue to distribute door hangers and letters to customers in areas impacted by FOG related overflows.	Complete
	SD1 will create and send out additional bill inserts to all customers within the service area. The bill stuffers will spotlight the harmful effects of FOG in sewer lines and proper grease handling techniques used to minimize the release of FOG into the collection system.	Complete
	SD1 will research the "Trap the Grease Program." This program involves supplying residences with a container for grease rather than pouring it down the drain.	Complete

Grease Control Program: Phased Implementation Tasks

Category	Task	Status/Activity
Grease Control Phase 2 Tasks / Completed January 2009 - January 2010		
Conduct Self Assessment	GBA will be modified and field crew personnel will be trained to ensure data is entered accurately and that the data is accessible and manageable.	Complete
	SD1 will create a list of collection system areas experiencing problems with FOG in the sanitary sewers. This list will be created using the information established in GBA in Phase 1.	Complete
	SD1 will create a list of FSEs that may be contributing to FOG problem areas. This list will be created using information provided from the Kentucky Health Department in Phase 1.	Complete
Revise Rules and Regulation / Enforcement Response Plan	If necessary, SD1 will begin drafting revisions to the District's Rules and Regulations and ERP to ensure proper legal authority and enforcement.	Complete
Design Criteria	SD1 will continue to coordinate with the Kentucky Division of Plumbing, Kentucky Health Department and Kentucky Environmental and Public Protection Cabinet on the development of design criteria for grease reduction device standards.	Complete
FSE Education	SD1 will continue developing the compliance assistance workshop for FSEs and will maintain the distribution of the BMP posters to permitted FSEs.	Complete
	SD1 will distribute letters and other informational pieces to residential customers in areas impacted by FOG related overflows. These pieces will be evaluated and updated as needed on a regular basis.	Complete
Develop Inspection Protocol	SD1 will begin developing an inspection protocol for plumbing plans, installation and final inspection. This will ensure the proper installation of appropriate grease control devices.	Complete
	Inspection frequency and inspection report forms will be developed to determine if the FSE is in compliance with the Grease Control Program.	Complete
Modify Food Service Discharge Permit	SD1 will revise the Food Service Discharge Permit to ensure the permit coincides with changes made to the Rules and Regulations and Emergency Response Plan. The permit will address grease control device management, operation and maintenance standards, onsite record keeping requirements, cleaning frequency, cleaning standards, additives and ultimate disposal.	Complete
	SD1 will evaluate and revise, if necessary, the Restraunt/Food Service Grease Questionnaire to ensure the proper information is supplied about grease handling procedures.	Complete

Grease Control Program: Phased Implementation Tasks

Category	Task	Status/Activity
Grease Control Phase 3 Tasks / To be completed January 2010 - January 2011		
Revise Domestic Holding Tank Waste Hauler Manifest	SD1 will evaluate and revise, if necessary, the Domestic Holding Tank Waste Hauler Manifest to better monitor the method and disposal of grease.	Complete
Evaluate Staffing and Equipment Requirements	SD1 will evaluate staffing levels and employ additional personnel, if necessary, to ensure requirements of the FOG program are being met.	Complete
FSE Education	SD1 will continue developing the compliance assistance workshop for FSEs.	Complete
	SD1 will maintain the distribution of the BMP poster to permitted FSEs.	On-going - distributed during FSE inspections. Brochures and pamphlets are also distributed during monthly FSE compliance assistance workshops.
Approval for Rules and Regulations / Enforcement Response Plan	SD1 will read publicly the modifications to the Rules and Regulations on two separate occasions at SD1's board meetings. A public comment period will begin with the first reading. SD1 will then submit revisions to SD1's Board of Directors for approval, then to the Cabinet for approval.	Complete
Public Education	SD1 will expand the grease control section of its website. The expansion will contain additional information for the public, FSEs and sludge haulers. Documents and forms will be made available for viewing and printing.	Web page material has been compiled and submitted to the Social Media Program Manager for loading onto SD1 website. Anticipated to be complete by the end of December 2010.
	SD1 will distribute letters and other informational pieces to residential customers in areas impacted by FOG related overflows. These pieces will be evaluated and updated as needed on a regular basis.	On-going task - distributed to residents in areas that experience overflows or in areas where inspection data reveal a grease problem.

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APPENDIX M:
FOG Management Policy



The purpose of this policy is to protect Sanitation District No. 1 (SD1) collection systems, pumping stations and treatment works from the discharge of excess fats, oil and grease (FOG) by ensuring that Food Service Establishments (FSE) are in compliance with the requirements of the SD1 Rules and Regulations, as well as commitments made by SD1 in the Capacity, Management, Operations and Maintenance (CMOM) Self-Assessment conducted under SD1 Consent Decree signed by SD1, the Environmental Protection Agency (EPA) Region 4 and the Kentucky Department of Environmental Protection (KDEP), in April 2007.

The accumulation of FOG in the collection system causes blockages which may lead to Sanitary Sewer Overflows (SSO). SSOs can lead to the degradation of water quality in the receiving waterbody, adversely impact SD1 operations and cause violations of the Clean Water Act (CWA) and/or the provisions contained in the Consent Decree. FOG blockages may also cause sewer back-ups into homes and businesses thereby causing property damage and the disruption of business activities.

The intent of this policy is to authorize SD1 staff to establish clear design standards and/or procedures and/or guidelines to regulate FSE operations, as well as the disposition of FOG wastes pumped from FSE Grease Control Equipment (GCE) during routine maintenance. The authority for this policy is contained in SD1 Rules and Regulations. Enforcement actions taken under this policy will be in accordance with SD1 Enforcement Response Plan (ERP).

FSEs shall install and maintain appropriately sized GCE in accordance with the provisions of this policy and its related design standards, guidelines and/or procedures. GCE shall be installed, operated, properly maintained and repaired at the sole expense of the FSE owner/operator.

As users discharging to the SD1 sewer system, FSEs shall comply with all requirements of the SD1 Rules and Regulations.

FSEs discharging to the SD1 collection system are subject to the FOG Management Policy and related design standards and/or procedures and/or guidelines, as well as the SD1 ERP. New construction of FSEs shall be in full compliance with the policy before commencing operations. New construction of FSEs shall have separate sanitary (restroom) and kitchen process lines. The kitchen process lines, including mop sinks, dishwashers and kitchen floor drains, shall be plumbed to appropriately sized GCE.

FSEs undergoing significant remodeling shall be in full compliance with the policy before recommencing operations after the remodeling work is completed.

FSEs in existence prior to the effective date of this policy may be allowed to continue current operations without significant modifications until such time as:

1. Significant remodeling is performed at the FSE facility, and/or
2. The facility's existing GCE is deemed to be of substandard size and/or design, and/or
3. The FSE is shown to be the cause of a FOG blockage in the SD1 collection system.
4. Any other reason deemed by SD1 as appropriate for significant modifications.

Existing FSEs found to be in noncompliance with this policy will be subject to the provisions of the ERP and shall be required to take immediate action pursuant to this policy and/or related procedures and/or guidelines.

SD1 or their designees will make the determination of whether a FSE has caused or contributed to a blockage in the collection system, as well as what actions will be required of the FSE to return to compliance.

:

1. GCE design and construction plans shall be submitted, reviewed and approved by SD1 Plan Review Department.
2. GCE shall meet the minimum requirements for GCE contained in SD1 Design Criteria. See attachment 1.
3. Waste and/or wastewater removed from FSE GCE shall be disposed of at a properly permitted facility that is authorized to accept such waste/wastewater in accordance with applicable federal, state and local laws and regulations. Waste/wastewater removed from GCE shall not be discharged to a private or public sewer unless permitted to accept said waste/wastewater.
4. FSEs shall not discharge FOG in amounts that contribute to a blockage in the collection system.
5. FSEs shall provide facilities and institute procedures in accordance with the SD1 FOG Management Policy and/or procedures and/or guidelines as are reasonably necessary to prevent or minimize the potential for accidental discharge of FOG into the sewage collection system. This includes implementation of "Best Management Practices (BMP)" protocols.
6. All FSEs in SD1 jurisdiction shall have a SD1 certified grease waste hauler complete a grease interceptor (GI) certification annually.
7. "Additives" shall be prohibited for use as grease management and control except as described in SD1 Fats, Oils & Grease Management Guidelines.
8. FSE facilities that permanently close for business shall completely pump out and clean all GIs on the premises and shall fill the GI with water. Pumping/cleaning of the GI prevents odors and deterioration of the GI from the weak acid FOG wastewater. Filling the out of

service GI with water provides weight for the GI not to shift position, and provides a barrier from exposure to further deterioration.

1. SD1 staff will develop and maintain definitions, design criteria and/or procedures and/or guidelines that are consistent with this policy.
 2. SD1 may issue FOG permits to FSEs to control FOG discharges to the SD1 sewer system, prevent obstruction and interference to SD1 collection system, pump stations and/or treatment plants, as well as prevent sanitary sewer overflows. SD1 may establish FSE FOG permit classifications, or issue general FOG permits to FSEs.
 3. SD1 may require that the FSE install monitoring equipment and/or additional GCE deemed necessary for compliance with this policy, and/or related design standards, procedures and/or guidelines and/or the SD1 Rules and Regulations.
 4. SD1 and/or their authorized representatives may conduct inspections of FSEs for GCE installation and maintenance, review of best management practices, and to gather information regarding FOG discharge impacts.
 5. SD1 and/or their authorized representative, has the right to enter the FSE's premises to determine impacts to the SD1 sewer system.
 6. SD1 and/or their authorized representative may conduct monitoring of the effluent from FSE GCE for the purpose of determining compliance with this policy and/or related procedures and/or guidelines and/or SD1 Rules and Regulations and/or to assess a surcharge to the FSE.
 7. SD1 may charge inspection, monitoring, assessment, impact and permit fees to FSEs to obtain reimbursement for FOG program costs.
 8. SD1 will administer a Certified Hauler program that includes training for those entities that pump, transport and dispose of FOG- waste/wastewater from FSEs.
-
1. Haulers wishing to transport GCE waste to a properly permitted SD1 facility must complete the Certified Hauler Program. These haulers shall:
 - Participate in certification classes conducted by SD1 in order to become a listed "Approved Hauler" by SD1.
 - At SD1's request, submit specific information regarding FSEs in a format specified by SD1.

Sanitation District No. 1

Fats, Oils & Grease (FOG) Management Guidelines

1. Additives: Include but are not limited to products that contain solvents, emulsifiers, surfactants, caustics, acids, enzymes and bacteria.
2. Certified Waste Hauler: Individuals or entities that have successfully completed the SD1 certification classes.
3. Significant Remodeling: Modifications made to an existing FSE sufficient to require issuance of a building permit or the temporary closure of the FSE for building renovation or as deemed needed by SD1.
4. Fats, Oils, & Grease (FOG): Organic polar compounds derived from animal and/or plant sources. FOG may be referred to as “grease” or “greases” in this section.
5. Food Service Establishment (FSE): Any establishment, business, facility or user engaged in preparing, serving or making food available for consumption. Single family residences are not a FSE. Under the discretion of SD1, FSEs will be classified as follows:

_____ : Day Care Facilities, Deli, Ice Cream shops, Coffee Shops, Beverage Bars – engaged in the sale of cold-cut and microwaved sandwiches/subs with no frying or grilling on site, defined by North American Industry Classification System (NAICS) 722213. SD1 reserves the right to add or subtract categories of the NAICS from this class at its discretion.

_____ : Limited-Service Restaurants - (i.e. Fast Food Facilities) as defined by NAICS 722211, Caterers as defined by NAICS 722320, Supermarkets and other Grocery (except Convenience) Stores that engage in the on-site preparation of food as defined by NAICS 445110 , both Convenience Stores and Gasoline Stations with Convenience Stores that engage in the on-site preparation of food as defined by NAICS 445120 and 447110, respectively, and Discount Department Stores that engage in the on-site preparation of food as defined by NAICS 452112. SD1 reserves the right to add or subtract categories of the NAICS from this class at its discretion.

_____ : Full Service Restaurants - as defined by NAICS 722110. SD1 reserves the right to add or subtract categories of the NAICS from this class at its discretion.

_____ : Buffet and Cafeteria Facilities - as defined by NAICS 72212. SD1 reserves the right to add or subtract categories of the NAICS from this class at its discretion.

_____ : Institutions (i.e. Schools, Hospitals, Prisons, etc) - as defined by NAICS 722310. SD1 reserves the right to add or subtract categories of the NAICS from this class at its discretion.

6. Exemption: A release from the requirement to install a Grease Interceptor (GI) with the substitution of a Grease Trap (GT). Exemptions are approved by SD1 based on responses to questions on the SD1 Request for Exemption form.
7. Garbage Disposal: A kitchen appliance designed to grind food particles to a small enough size to dispose to a sink drain.
8. Grease (Brown): Fats, oils and grease that is discharged to the grease control equipment, or is from kitchen or food prep wastewater.
9. Grease (Yellow): Fats, oils and grease that has not been in contact or contaminated from other sources (water, wastewater, solid waste, etc) and can be recycled.
10. Grease Control Equipment (GCE): Devices for separating and retaining FSE wastewater FOG prior to entering the SD1 sewer system. The GCE is constructed to separate and trap or hold fats, oils and grease substances from entering the SD1 sewer system. GCE should only receive kitchen wastewater. Devices include grease interceptors, grease traps, or other devices approved by SD1.
11. Grease Interceptor (GI): GCE identified as a large multi-compartment tank, usually 1,000 gallon to 2,000 gallon capacity with proper inlet and outlet T's, and other necessary components, that provides FOG control for a FSE. No sanitary wastewater (black water) line should be connected to the grease interceptor. Grease interceptors will be located outside the FSE.
12. Grease Trap (GT): GCE identified as an "under the sink" trap, a small container with baffles, or a floor trap. For a FSE approved to install a grease trap, the minimum size requirement is the equivalent of a 25-gallon per minute/50 pound capacity trap. Grease traps shall have flow control restrictor and a vent pipe. No dishwasher, or sanitary wastewater (black water) line shall be allowed to be connected to a "under the sink" or floor grease trap.
13. Grease Recycle Container: A container used for the storage of yellow grease.
14. Multi-Unit Facility: A single building or facility with multiple separate but adjoining units, each with separate plumbing and possibly other utilities.
15. NAICS: North American Industry Classification System. The website is found at: (<http://www.census.gov/epcd/www/naics.html>)
16. Series (Grease Interceptors Installed in Series): Grease interceptor tanks are installed one after another in a row and are connected by plumbing pipe.
17. Single Service Kitchen: A FSE that does not prepare food onsite (heat and serve only) and which uses only disposable serviceware (utensils and dishes).
18. Tee or T (Influent & Effluent): A T-shaped pipe extending from the ground surface below grade into the grease interceptor to a depth allowing recovery (discharge) of the water layer located under the layer of FOG. Influent & effluent T's are recommended to be made of PVC – schedule 40 or equivalent material. Influent T's should extend 2/3 of the grease interceptor water depth, and effluent T's should extend to within 12" to 15" of the bottom of the interceptor tank to prevent short-circuiting.

19. User: Any person that contributes, causes, or permits the contribution or introduction of wastewater or pollutants into the SD1 sanitary or combined sewer system and / or stormwater into the Municipal Separate Storm Sewer System (MS4), whether intentional or unintentional, and whether direct or indirect.
20. Water (Black): Wastewater containing human waste, from sanitary fixtures such as toilets and urinals.
21. Water (Gray): Wastewater other than black water as defined in this section.
22. Sanitary Sewer Overflow (SSO): A condition whereby untreated sewage is released into the environment prior to reaching treatment facilities thereby escaping wastewater treatment.

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1. GCE shall be designed and constructed in accordance with the provisions of the FOG Management Policy, these guidelines and/or SD1's Design Manual.
 - A. Final GCE sizing determination will be made by FSE's engineer, architect or contractor based on criteria such as, but not limited to, flow rate, discharge rate, fixture ratings and wastewater retention time.
 - B. acceptable size of GCE for each FSE Classification will be as follows:
 - i. Class 1: Deli, Ice Cream shops, Beverage Bars, Coffee Shops, - 25 gallons per minute / 50 pound.
 - ii. Class 2: Limited-Service Restaurants / Caterers / Supermarkets, other Grocery Stores and Discount Department Stores with on-site food preparation – 1,000 gallon GI
 - iii. Class 3: Full Service Restaurants - 1,000 gallon GI
 - iv. Class 4: Buffet and Cafeteria Facilities - 1,500 gallon GI
 - v. Class 5: Institutions (Schools, Hospitals, Prisons, etc) - 2,000 gallon GI or two 1000 gallon GI installed in series.
 - C. SD1 will review GCE sizing information received from the FSE's engineer, architect or contractor. SD1 will make a decision to approve, or require additional GCE volume, based on the type of FSE, the number of fixture units, and additional calculations. Grease interceptor capacity should not exceed 2,000 gallons for each interceptor tank. In the event that the grease interceptor calculated capacity needs to exceed 2,000 gallons, the FSE shall install an additional interceptor of the appropriate size. If additional interceptors are required, they shall be installed in series.
 - D. Grease interceptors that are installed in series shall be installed in such a manner to ensure positive flow between the tanks at all times. Therefore, tanks shall be installed so that the inlet invert of each successive tank shall be a minimum of 2 inches below the outlet invert of the preceding tank.
 - E. Grease interceptors that are installed in series shall include adaptors, gaskets or flexible transition couplings of minimum of schedule 40 PVC pipe.

2. Property service connections shall be sized based on fixture units with a minimum size of a 6-inch connection to GCE
3. New FSEs (class 2 – 5), as well as existing facilities (class 2 – 5) that are undergoing significant remodeling shall install and maintain at a minimum, an approved 1,000 gallon grease interceptor located outside the FSE building.
4. New FSEs (class 1), as well as existing facilities (class 1) that are undergoing significant remodeling shall install and maintain, at a minimum, a GT whose size is rated at 25 gallons per minute / 50 pounds capacity.
5. New construction of FSEs shall have separate sanitary (restroom) and kitchen process lines. The kitchen process lines shall be plumbed to appropriately sized GCE. Kitchen process lines and sanitary lines may combine prior to entering the public sewer; however the lines cannot be combined until after the GCE. Sanitary wastewater, or black water, cannot be connected to GCE.
6. When an existing building and/or building's plumbing is being renovated and the facility is a FSE, internal plumbing shall be reconstructed to separate sanitary (restroom) flow from kitchen process flow. Sanitary flow and kitchen process discharges shall be approved separately by SD1 and shall discharge from the building separately. The kitchen process line(s) shall be plumbed to appropriately sized GCE. Kitchen process lines and sanitary lines may combine prior to entering the public sewer; however the lines cannot be combined until after the GCE.
7. New multi-unit facility, or new "strip mall" facility, owners shall contact SD1 prior to conducting private plumbing work at the multi-unit facility site. Multi-unit facility owners, or their designated contractor, shall have plans for separate private wastewater lines for kitchen and sanitary wastewater for each "individual" unit. In addition, the plans shall identify "stub-out" locations to accommodate a minimum 1,000 gallon grease interceptor for each unit of the multi-unit facility. New multi-unit facility, or new "strip mall" facility owners shall consider suitable physical property space and sewer gradient that will be conducive to the installation of an exterior, in-ground GI when determining the building location.
8. SD1 Plan Review Group will review plans for any FSE in classes 1 through 5 as part of the building permit acquisition process.

A. FSE owners or their designee shall submit 2 sets of FSE facility plans to:

for review and approval by SD1.

B. Facility plans shall include the following sheets: a floor plan detailing kitchen prep equipment and showing how greasy waste lines discharge to GCE, plumbing (P1 & P2) sheets, and a GCE specification sheets.

C. Plumbing sheets shall include identification of all cooking and food preparation equipment (i.e. fryers, grills, woks, etc...); the number and size of dishwashers,

sinks, floor drains, and other plumbing fixtures; greasy waste bearing plumbing lines the location of GCE, and specifications for GCE. The discharge from the following fixtures shall be plumbed to the GCE: all sinks (3-compartment, vegetable prep, mop, etc), dishwashers, floor drains in food preparation and storage areas, garbage disposals, and other fixtures through which grease may be discharged such as woks and soup ladles.

- D. SD1 Plan Review Group personnel will review the plumbing plans and GCE sizing; and approve, or make changes as necessary to aid in the protection of a FOG discharge from the FSE.
 - E. If the plans are approved by SD1, a First Release will be issued to the FSE.
 - F. Personnel from SD1 Inspection Group will inspect the GCE. Call 859-578-6880 forty-eight (48) hours prior to installation to schedule the inspection. SD1 will not approve GCE that has not been inspected and approved by SD1.
 - G. If the installed GCE is approved by SD1, a Final Release will be issued to the FSE.
9. Single service kitchens with no onsite food preparation (heat and serve only), and which use only disposable service ware (utensils) may not be required to install GCE. The FSE owner or designee must complete and submit a Request for Exemption form in order to be considered for an exemption. However, if kitchen practices change in an exempted FSE, or if the exempted FSE is found to directly cause or contribute to a grease blockage or SSO in SD1's collection system, the exemption will become null and void. Call the Industrial Monitoring Department at 859-331-6674 to obtain a Request for Exemption form.
10. Substandard GCE - In the event an existing FSE's GCE is deemed by SD1 to be either undersized or substandard in design, the FSE owner(s) will be notified in writing by SD1 of the deficiencies and required improvements, and given a compliance deadline not to exceed six (6) months to comply.

11. Prohibitions

- A. FSEs shall not contribute or cause to be contributed into the SD1 collection system the following:
 - i. Hot water running continuously through GCE;
 - ii. Discharge of concentrated alkaline or acidic solutions into GCE;
 - iii. Discharge of concentrated detergents into GCE.

12. SD1 Certified Waste Hauler Program

- A. All GCE waste haulers wishing to transport GCE waste to a properly permitted SD1 facility shall:
 - i. Attend annual hauler certification training sessions presented by SD1.
 - ii. Agree to conduct GCE certifications in the manner presented by SD1 in training sessions by SD1 personnel.
 - iii. Agree to provide information on GCE certifications to SD1 in a timely manner.
 - iv. Agree to completely evacuate FOG from GCE when servicing such GCE at FSEs. If the volume of the GCE is greater than the tanker capacity, the

- hauler agrees to provide additional tankers so that the GCE is fully evacuated within a 24-hour period.
- v. Agree to provide information relative to FOG removed at FSEs in format required by SD1.
 - vi. Dispose of FOG waste at a facility permitted and authorized to receive such waste in accordance with applicable federal, state and local laws and regulations.
 - vii. Perform GCE maintenance in accordance with these guidelines.

B. SD1 will:

- i. Provide certification training to the haulers wishing to participate in the program.
- ii. Provide a listing of all certified haulers to FSEs
- iii. Require minimum GCE maintenance frequencies of FSEs

C. Annual Requirement for Grease Interceptor or Grease Trap Certification

- i. FSEs under SD1 jurisdiction must have their grease interceptor or grease trap inspected and certified annually. Certification of the interceptor or trap must be conducted by a SD1 certified grease waste hauler to verify that all necessary components of the grease interceptor or grease trap are properly installed and in proper working condition. If a grease interceptor or grease trap “passes” the certification requirement, then no further action is required. If a grease interceptor or grease trap “fails” the certification requirement, then a corrective action response is required from the FSE owner or authorized representative by a date specified in the corrective action response. Completed original certification forms {Grease Interceptor Certification (Form A) or Grease Trap Certification (Form B)} must be completed and signed by the “certified” grease waste hauler, as well as the FSE owner or authorized representative, and submitted to:
 - ii. Failure of a Grease Interceptor Certification, or Grease Trap Certification: The FSE owner or authorized representative is responsible for including detailed “Corrective Action Response” information on the Grease Interceptor Certification Form, or Grease Trap Certification Form that is submitted to SD1. If necessary, additional pages can be attached to the certification form. At a minimum, the “Corrective Action Response” information must include the reason for the failed certification, what corrective action will be taken to correct the problem, and the date the corrective action will be completed.
 - iii. FSEs with GCE shall maintain a log of the pumping/cleaning maintenance activities performed for each GCE on the premises. GCE maintenance records shall include, at a minimum, the date of cleaning/maintenance, company or person conducting the cleaning/maintenance, FSE name and address, and specific volume of grease wastewater removed from the GCE. Manifests/trip tickets shall be maintained for a period of 3 years to substantiate the maintenance log. However, manifests alone will not meet the requirement.

- iv. GCE maintenance records shall be available at the FSE premises so they can be provided to SD1 personnel or their representative. The FSE shall maintain GCE maintenance records onsite for three (3) years.
- v. Each GCE shall be fully evacuated (complete pumpout of GI contents) unless the volume is greater than the tank capacity of the pumper vehicle in which case the hauler shall arrange for additional transportation capacity so that the GCE is fully evacuated within a 24 hour period.
- vi. The return of gray water back into the GCE from which the waste was removed is prohibited.
- vii. Waste removed from GCE shall be disposed of at a facility permitted and authorized to receive such waste in accordance with applicable federal, state and local laws and regulations. Pumped waste shall not be discharged to a private or public sewer unless as permitted above.

13. FSEs shall observe Best Management Practices (BMPs) for controlling the discharge of FOG from their facility.

14. Grease Interceptor (GI) Cleaning/Maintenance Requirements

- A. Grease interceptors must be pumped-in-full when the total accumulations of surface FOG (including floating solids) and settled solids reaches twenty-five percent (25%) of the grease interceptor's overall liquid depth. This criterion is referred to as the "25 Percent Rule". At no time shall the cleaning frequency of the grease interceptor exceed 90 days unless approved by SD1. Some existing FSEs in Class 2 through 5 will need to consider a 30 day pumping frequency or a 60 day pumping frequency to meet the 25 Percent Rule requirement. SD1 requires that a SD1 certified grease waste hauler do the pumping of the FSE's grease interceptor.
- B. Partial pump of interceptor contents or on-site pump & treatment of GI contents will not be allowed due to reintroduction of fats, oils and grease to the interceptor and pursuant to the Code Federal Regulation 40 CFR403.5(b)(8), which states "Specific prohibitions. In addition, the following pollutants shall not be introduced into a POTW: Any trucked or hauled pollutants, except at discharge points designated by the POTW".
- C. Special pumping frequency approval may be granted by SD1, on a case by case basis, for unusual circumstances.
- D. All FSEs in the SD1 jurisdiction must have a SD1 certified grease waste hauler complete a grease interceptor certification annually. The grease interceptor certification must be signed by the FSE owner or authorized representative. If a grease interceptor certification fails, then the FSE owner or authorized representative must provide a corrective action response to SD1. The corrective action response will identify the reason for the failure, what corrective action will be taken to correct the problem, and the date the corrective action will be completed.
 - i. Grease interceptor effluent-T shall be inspected during cleaning and maintenance and the condition noted by the grease waste hauler's company or individual conducting the maintenance. Effluent-T's that are loose, defective, or not attached must be repaired or replaced ASAP.
- E. SD1 shall monitor the method and location of grease removed from accepted GCE.

All grease removed from permitted FSE's must be disposed of in accordance with all federal, state and local regulations, as well as, the SD1 Waste Hauler Permit. SD1's Industrial Monitoring Department will review disposal locations on a case by case basis.

15. Grease Trap (GT) Cleaning/Maintenance Requirements

- A. GTs shall be completely cleaned of fats, oils, and grease and food solids at a minimum of every two (2) weeks, unless more or less cleaning frequency is authorized/required by SD1. If the FOG and food solids content of the grease trap is greater than 25% of the water depth capacity of the grease trap, then the grease trap shall be cleaned every week, or as frequently as needed to prevent 25% of capacity being occupied with FOG and food solids.
- B. FSEs in the SD1 jurisdiction shall have a SD1 certified grease waste hauler complete a grease trap certification annually. The grease trap certification shall be signed by the FSE owner or authorized representative. If a grease trap certification fails, then the FSE owner or authorized representative shall provide a corrective action response to SD1. The corrective action response shall identify the reason for the failure, what corrective action will be taken to correct the problem, and the date the corrective action will be completed.
 - i. During cleaning of the grease trap, the flow restrictor shall be checked to ensure it is attached and operational.
- C. Grease Trap waste shall be sealed or placed in a container to prevent leachate from leaking, and then disposed of properly.
- D. Grease Trap waste shall not be mixed with yellow grease in the grease recycle container.

16. "Additives" are prohibited for use as grease management and control.

- A. If SD1 identifies an FSE that is using "additives" and is contributing FOG to the SD1 sewer system, or has caused any interference to the sewer system, the FSE shall immediately stop use of the "additive".
- B. At no time shall additives be used just prior to under the sink or floor grease traps.
- C. The use of additives is prohibited with the following exceptions:
 - i. If the product used can be proven to contain 100% bacteria, with no other additives. Approval of the use of the product must come from SD1, and the FSE must submit a full disclosure Material Safety Data Sheet and certified sample results from the manufacturer of the product.
- D. The use of approved additives shall in no way be considered as a substitution to the maintenance procedures required per this policy.

17. Right of Entry – Inspection and Monitoring

- A. SD1 shall have the right to enter the premises of FSEs to determine whether the FSE is complying with the requirements of this policy and/or SD1 Rules and Regulations. FSEs shall allow SD1 personnel, upon presentation of proper credentials, full access to all parts of the premises for the purpose of inspection, monitoring, and/or records examination. Unreasonable delays in allowing SD1 personnel access to the FSE premises shall be a violation of this policy and the SD1 Rules and Regulations.
- B. SD1 may require that the FSE install monitoring or additional pretreatment equipment deemed necessary for compliance with this policy and/or SD1 Rules and Regulations.

18. Enforcement Action

- A. Enforcement action or Notice of Violation's may result against a FSE for instances that include, but is not limited to, failure to clean or pump grease control equipment, failure to maintain grease control equipment including inspection and installation of properly functioning effluent-T and baffles, failure to install grease control equipment, failure to control FOG discharge from the FSE, contributing to a sewer line blockage or obstruction, contributing to a Sanitary Sewer Release, failure to submit a Corrective Action Response and use of additives in such quantities so that FOG is pushed downstream of the FSE. Enforcement actions will be based on the SD1 Enforcement Response Plan.

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1. Inlet, outlet and baffle piping shall have 2-way cleanout T's installed.
 2. Inlet piping shall enter the receiving chamber 2 1/2" above the invert of the outlet piping.
 3. On the inlet pipe, inside the receiving chamber, a sanitary T of the same size pipe in the vertical position with the top unplugged shall be provided as a turndown. To provide air circulation and to prevent "air lock", a pipe installed in the top T shall extend to a minimum of 6" clearance from the interceptor ceiling, but not less than the inlet pipe diameter. A pipe installed in the bottom of the T shall extend to a point of 2/3 the depth of the tank. . See illustration on page 9.
 4. The outlet piping shall be no smaller than the inlet piping, but in no case smaller than 4" inner diameter (ID).
 5. The outlet piping shall extend to 12" above the floor of the GI and shall be made of a non-collapsible material. The top of the outlet T pipe should be no less than 4" above the static water line. T's must be anchored securely at the bottom.

6. The outlet piping shall contain a T installed vertically with a pipe installed in the top of the T to extend to a minimum of 6" clearance from the interceptor ceiling, but not less than the pipe diameter, with the top open. See illustration on page 17.

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1. The inlet compartment shall be 2/3 of the total liquid capacity with the outlet compartment at 1/3 liquid capacity of the GI.
 2. The GI shall have a non-flexing (i.e. concrete, steel, etc.) baffle the full width of the interceptor, sealed to the walls and the floor, and extended from the floor to within 6" of the ceiling. The baffle shall have a sanitary T located on the receiving side of the baffle wall which shall extend through the baffle into the outlet compartment. The baffle wall piping shall be installed vertically with a pipe installed in the top of the T to extend to the height of the baffle wall. The baffle wall piping shall extend from the bottom of the T to 12" above the floor of the GI. The baffle wall piping shall be at least equal in diameter size to the inlet piping, but in no case less than 6" ID. The baffle wall shall be sealed to the T and the baffle wall piping secured to the baffle wall. All baffle wall piping shall be made of a non-collapsible material. See illustration on page 17.

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1. Access to GIs shall be provided by a minimum of one manhole per GI division (baffle chamber) and of 24" minimum dimensions terminating 1" above finished grade with cast iron frame and cover. If manhole access exists in a paved area, a slope of greater than or equal to 0.2 may be used to achieve the 1" terminating manhole access requirement. An 8" thick concrete pad extending a minimum of 12" beyond the outside dimension of the manhole frame shall be provided. One manhole shall be located above the inlet T hatch and the other manhole shall be located above the outlet T hatch, so as to provide a clear view of both the inlet and outlet T for inspection. 1000 gallon GI's that possess a manhole access opening over only the inlet and outlet must possess a 6" cleanout access located over the baffle wall. A minimum 24" of clear opening above each manhole access. GI's 1500 gallons and larger must possess a minimum of 3 manholes; one above the influent, one above the effluent and one above the baffle.
 2. Access openings (manholes) shall be maintained to facilitate maintenance, cleaning, pumping, and inspections.
 3. Access openings (manholes) shall be mechanically sealed and gas tight to contain odors and bacteria and to exclude vermin and ground water, in a manner that permits regular reuses.
 4. Manhole covers shall be secure, watertight, sturdy and able to withstand vehicle traffic.

GIs shall comply with one of the following:

- Seal the interceptor, fill with water raised to a level that will submerge all inlet and outlet points of the manhole, and let stand for a minimum of 4 hour. There shall be no visible

leakage. Prefabricated concrete gravity grease Interceptors shall not be rejected for damp spots due to condensation on the exterior surface.

It is highly recommended that the water remain in the GI prior to initiation of usage. The GI will function better if it contains water upon initiation of usage.

- Air test procedure shall follow STI F 921 and PEI RP 100 Section 3.

The regulated air supply test pressure used for this test is not to be less than 3 psig (21 kPa) nor more than 5 psig (35 kPa). Use only calibrated diaphragm type air pressure gauges with a zero to 10 psig dial span. Set pressure relief valve in test air supply line at 4.5 psig.

Temporarily plug, cap or seal of all tank openings to hold pressure. Install air supply piping to appropriate tank penetration with air supply piping, over pressure relief device, air isolation valve and pressure gauge. Close air isolation valve to tank and turn on air supply. Slowly open air isolation valve to pressure primary tank. Pressure gauge should read minimum 3 psig to 5 psig maximum. Record the pressure reading. Close air isolation valve and disconnect air supply line to tank.

A steady drop in pressure indicates there may be a leak in the primary tank.

Hold primary air test for 1 hour minimum. No leaks shall be allowed.

If the tank(s) fails to meet the testing described above, it shall be repeated with new samples. Test reports shall show total number of tanks tested, number passing, number failing, and reason for failure.

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1. GIs shall be located so as to be readily accessible for cleaning, maintenance, and inspections. GIs shall be located close to the fixture(s) discharging the greasy wastestream(s).
 2. GIs shall not be installed in “drive-thru” lanes or a parking area. GIs shall never be paved over.
 3. GIs shall be installed at a minimum distance of 10’ from sinks and dishwashers to allow adequate cooling of wastewater. The influent to GIs shall not exceed 140 degrees Fahrenheit (140° F).
 4. Where garbage disposals are installed, the waste from those units must pass through the GI according to applicable SD1 Rules and Regulations. For GIs with discharges from a garbage disposal, the GI size shall be increased by 30% of the sizing requirement.

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1. GI minimum size shall be 1,000 gallon capacity, and maximum size will be 2,000 gallon capacity. If additional capacity is required, the FSE shall install multiple GIs in series.
 2. For GIs with discharges from a dishwasher, the GI size shall be increased a minimum of thirty percent (30%) of the sizing requirement. Thirty percent (30%) is required to prevent

short-circuiting of the GI when the extremely hot water from a dishwasher is introduced to the GI.

3. GIs installed in series shall be installed in such a manner to ensure positive flow between the GIs at all times. Therefore GIs shall be installed so that the inlet invert of each successive GI shall be a minimum of 2 inches below the outlet invert of the preceding GI.
4. GIs installed in series shall have adaptors or gaskets or flexible transition couplings used as piping connections between the GIs installed in series. The adaptors or gaskets or flexible transition couplings shall be constructed of a minimum of schedule 40 PVC.

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1. GIs shall be constructed of sound durable materials, not subject to excessive corrosion or decay, and shall be water and gas tight. Each GI shall be structurally designed to withstand any anticipated load to be placed on the GI (i.e. vehicular traffic in parking or driving areas). Concrete is the standard material approved by SD1, however, SD1 will consider other materials, such as fiberglass or plastic grease interceptors, if a professional engineer (PE) provides calculations and evidence that the device will meet SD1 requirements and not be a danger to the public, or environment.

- : Material requirements shall comply with the “Materials and Manufacture” section of ASTM C 1613 and shall have a minimum compressive strength of 4000 psi (28 MPa) at 28 days of age and shall have a maximum water to cementitious ratio (w/c) of 0.45.

- : Flexible sealants employed in the manufacture or installation of GIs shall comply with ASTM C 990. Rigid (mortar) sealing or grout sealant of GI sections shall not be permitted.

- : Lifting devices, embedded or otherwise attached to the GI, shall comply with the requirements of ASTM C 890.

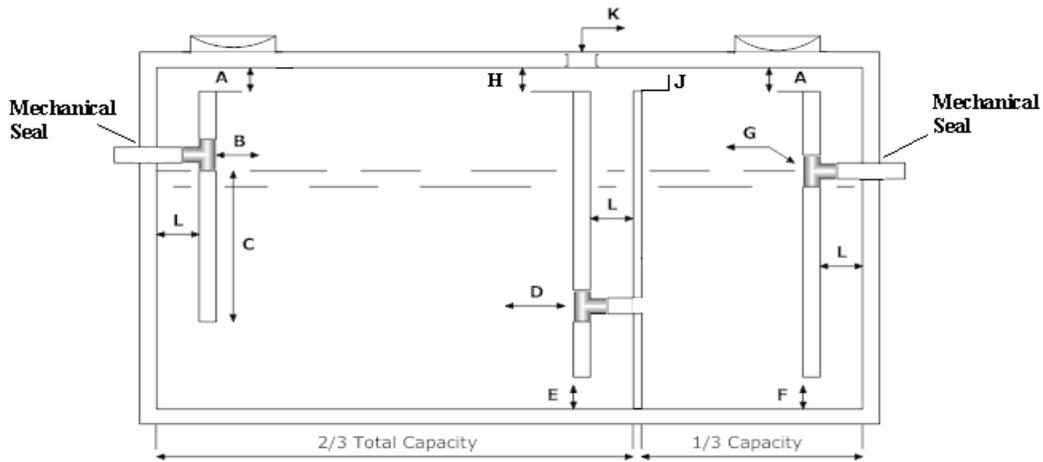
- : Polypropylene or polyolefin fibers are only permitted as a secondary reinforcing material, at the manufacturer’s option, in precast concrete GIs. For the purposes of this standard, secondary reinforcing material is only used to resist temperature and shrinkage effects. Only fibers of Type III conforming to the requirements of ASTM C 1116 shall be accepted.

- : Steel fibers are only permitted as a secondary reinforcing material, at the manufacturer’s option, in prefabricated GIs. For the purpose of this standard, secondary reinforcing material is only used to resist temperature and shrinkage effects. Steel fibers shall meet the requirements of ASTM A 820.

- : Fiberglass reinforced polyester prefabricated gravity GIs shall comply with the requirements for fiberglass – reinforced polyester septic tanks in paragraph 4.2 of IAPMO/ANSI Z1000.
- : Gaskets shall be of a resilient material, resistant to attack by acids or alkalis that may be present in soils or sewage. The manufacturer shall specify the appropriate ASTM standards that the gasket material meets and the acids or alkalis that the material is resistant to.
- : Polyethylene prefabricated gravity GIs shall comply with the requirements for polyethylene septic tanks in paragraph 4.3 of IAPMO/ANSI Z1000.
- : Interior steel GI walls shall be coated with material complying with the requirements of UL 58 and UL 1746 and manufactured per the requirements of the Steel Tank Institute (STI).

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1. Prefabricated gravity GIs shall be permanently and legibly marked with the following:
 - Manufacturer's name or trademark, or both
 - Model number
 - Capacity
 - Month and year of manufacture
 - Load limits and maximum recommended depth of earth cover in feet; and Inlet and outlet.
 2. The marking shall appear on a plate that has been permanently attached, molded, cast, or wet set onto the GI, located either on the left hand side of the inlet or on top of the GI near the inlet. Permanent markings shall be adequately protected from corrosion so as to remain permanent and readable over the life of the GI.
 3. Each GI shall be accompanied by manufacturer's installation instructions.

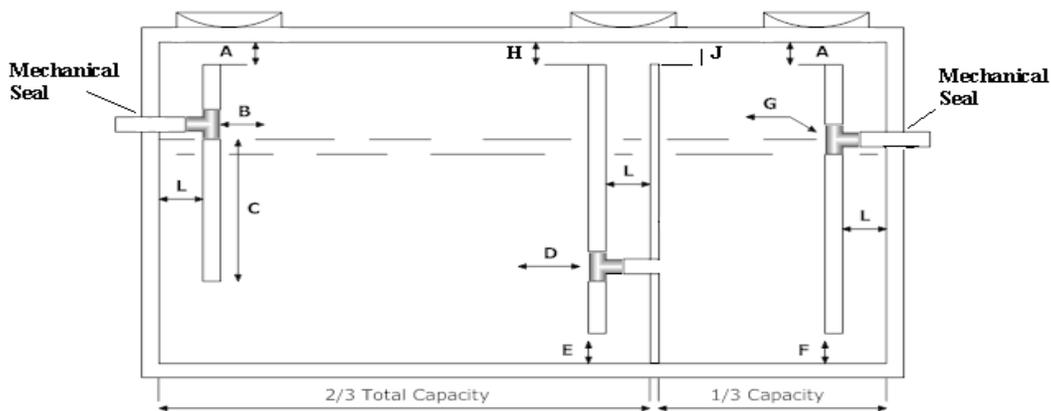
1000 Gallon Grease Interceptor



For Illustrative Purposes Only

- A) Minimum 6", but not less than pipe diameter
- B) Inlet pipe invert to be 2 1/2" above liquid surface
- C) Inlet pipe to terminate 2/3 depth of water level
- D) Baffle T
- E) 12" from floor to end of baffle pipe
- F) 12" from floor to end of outlet pipe
- G) Outlet pipe no smaller than inlet pipe
- H) Top of baffle pipe terminates no lower than baffle height
- I) Inlet chamber is 2/3 total capacity; outlet chamber 1/3 total capacity
- J) 6" minimum distance from ceiling
- K) Minimum 6" cleanout

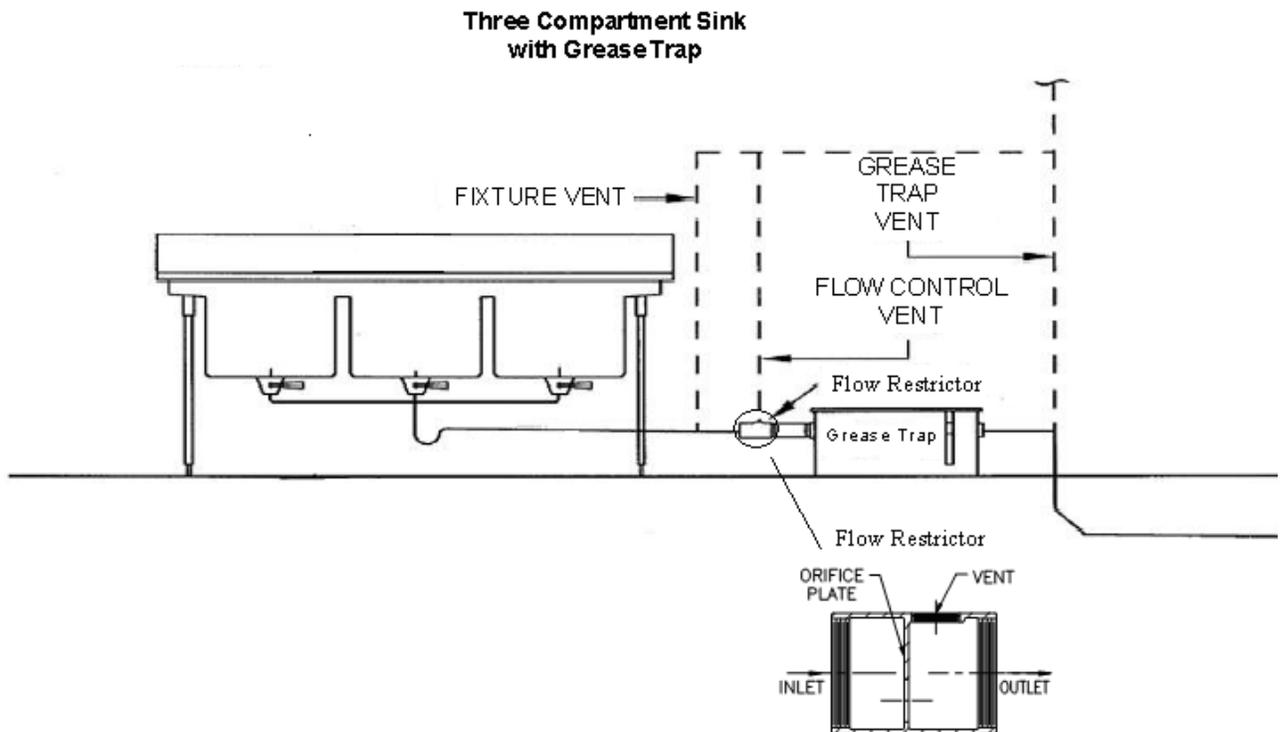
≥ 1500 Gallon Grease Interceptor



For Illustrative Purposes Only

- A) Minimum 6", but not less than pipe diameter
- B) Inlet pipe invert to be 2 1/2" above liquid surface
- C) Inlet pipe to terminate 2/3 depth of water level
- D) Baffle T
- E) 12" from floor to end of baffle pipe
- F) 12" from floor to end of outlet pipe
- G) Outlet pipe no smaller than inlet pipe
- H) Top of baffle pipe terminates no lower than baffle height
- I) Inlet chamber is 2/3 total capacity; outlet chamber 1/3 total capacity
- J) 6" minimum distance from ceiling

1. GTs shall have the Kentucky State Plumbing Code certification. The acceptable size is rated at 25 gallons per minute / 50 pounds capacity. All GTs shall be installed as per manufacturer's specifications, which include the flow restrictor and venting prior to the discharge entering the GT.
2. GTs shall have flow control restrictor and be vented.
3. Dishwashers shall not be connected to an under-the-sink GT or floor GT. Dishwashers will cause hydraulic overload of the GT.
4. Any floor GT must be an approved "floor" trap that is able to be installed below the floor level. Many standard "under-the-sink" units are not made of proper materials that allow an in-floor installation. Unapproved floor trap units will rust and leak within a few months of operation.



APPENDIX N:

Pump Station Backup Power Update

Pump Station Backup Power Plan

CIP Title	Basin	Original Proposed Solution	Updated Proposed Solution	Scheduled Completion Date	Actual Completion Date	Status Description As of December 2010
Category 1 Projects (4 total projects)						
Alex Licking	East	Permanent Generator	n/a	2008	2008	Complete
American Sign	West	Permanent Generator	n/a	2008	2008	Complete
Riley Road	East	Permanent Generator	n/a	2009	2009	Complete
Sunset	East	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2010	2010	Complete
Category 2 Projects (21 total projects)						
Kahns	East	PS Elimination	n/a	2007	2007	Complete
Meadow Hill	Central	PS Elimination Study	PS Elimination	Study - 2008 2012 - 2015	2008 2010	Complete
Riley Road No. 1	East	PS Elimination	n/a	2009	2009	Complete
Riley Road No. 2						
Riverwatch PS	North	PS Elimination Study	PS Elimination	Study - 2008 2012 - 2015	2008 2008	Complete Complete
South Park Industrial	North	PS Elimination Study	Backup Dry Prime Pump with a Diesel Engine	Study - 2008 2012 - 2015	2008 2010	Complete Complete
Wedgewood Dr	Central	PS Elimination Study	PS Elimination	Study - 2008 2012 - 2015	2008	Complete Project In-Progress
Willow Bend No. 2	West	PS Elimination Study	PS Elimination	Study - 2008 2012 - 2015	2008 n/a	Complete Initial Project Analysis
Army Reserve	East	PS Elimination Study	Initial analysis indicated that this station can be eliminated by means of gravity sewer. Cost-effectiveness of solution to be further analyzed before final determination is made.	Study - 2008	2008	Complete
				2012 - 2015	n/a	Initial Project Analysis
Eagles Landing	West	PS Elimination Study	Initial analysis indicated that this station can be eliminated by means of gravity sewer. Cost-effectiveness of solution to be further analyzed before final determination is made.	Study - 2008	2008	Complete
				2012 - 2015	n/a	Initial Project Analysis
Evergreen	Central	PS Elimination Study	Initial analysis indicated that this station can be eliminated by means of gravity sewer. Cost-effectiveness of solution to be further analyzed before final determination is made.	Study - 2008	2008	Complete
				2012 - 2015	n/a	Initial Project Analysis

Pump Station Backup Power Plan

CIP Title	Basin	Original Proposed Solution	Updated Proposed Solution	Scheduled Completion Date	Actual Completion Date	Status Description As of December 2010
Category 2 Projects (continued)						
Lamphill	East	PS Elimination Study	Evaluation indicated that it is not feasible to eliminate this station by means of gravity sewer. A backup power solution will be identified for this location.	Study - 2008	2008	Complete
				2012 - 2015	n/a	Initial Project Analysis
Mill House Crossing	Central	PS Elimination Study	Evaluation indicated that it is not feasible to eliminate this station by means of gravity sewer. A backup power solution will be identified for this location.	Study - 2008	2008	Complete
				2012 - 2015	n/a	Initial Project Analysis
Ridgefield	North	PS Elimination Study	PS Elimination	Study - 2008	2008	Complete
				2012 - 2015	n/a	Initial Project Analysis
War Admiral	West	PS Elimination Study	PS Elimination	Study - 2008	2008	Complete
				2012 - 2015		Project In-Progress
Blackstone	West	PS Elimination Study	These stations will be eliminated after the Western Regional collection system is operational.	Study - 2008	2008	Complete
				2012 - 2015	n/a	
Dublin Green No. 1	West	PS Elimination Study		Study - 2008	2008	Complete
				2012 - 2015	n/a	
Fowler Creek	West	PS Elimination		2013	n/a	
Gammon Calmet	West	PS Elimination		2013	n/a	
Gunpowder	West	PS Elimination		2013	n/a	
Union	West	PS Elimination		2013	n/a	

Pump Station Backup Power Plan

CIP Title	Basin	Original Proposed Solution	Updated Proposed Solution	Scheduled Completion Date	Actual Completion Date	Status Description As of December 2010
Category 3 Projects (24 total projects)						
Airport Exchange Ind Park	North	Permanent Generator	n/a	2009	2009	Complete
Barrs Branch	East	Permanent Generator	Portable Generator	2009	2009	Complete
Cedar Point	East	Permanent Generator	n/a	2009	2009	Complete
Bullitsville	North	Permanent Generator	n/a	2008	2008	Complete
Catalpa	Central	Permanent Generator	n/a	2009	2009	Complete
Centerplex	East	Permanent Generator	n/a	2008	2008	Complete
Hempsteade	West	Permanent Generator	n/a	2009	2009	Complete
Highland Heights	East	Portable Generator	n/a	2009	2009	Complete
Dublin Green No. 2	West	Permanent Generator	n/a	2009	2009	Complete
Brookwood	East	Permanent Generator	n/a	2009	2009	Complete
Ky Aire	West	Permanent Generator	n/a	2008	2007	Complete
Levi	West	Permanent Generator	n/a	2008	2007	Complete
Maple Ave	Central	Permanent Generator	n/a	2009	2009	Complete
Sand Run	North	Permanent Generator	n/a	2008	2008	Complete
Saturn	West	Permanent Generator	n/a	2009	2009	Complete
Second Street	Central	Permanent Generator	n/a	2009	2009	Complete
Skyport	North	Permanent Generator	n/a	2008	2008	Complete
South Hampton	West	Permanent Generator	n/a	2008	2007	Complete
Thornwilde	North	Permanent Generator	n/a	2008	2008	Complete
Bunning Lane	East	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2008		Project In-Progress
Kees	East	Permanent Generator	Property owner issues; investigate the installation of back up dry pump system with diesel engine	2014		Project In-Progress
Overlook	East	Permanent Generator	Property owner issues; permanent generator no feasible. Evaluating alternate backup power solution. The generator initially procured for this location will be moved to Newport Steel Pump Station.	2014	n/a	Evaluating Solutions
Riverview Farms	North	Permanent Generator	Property owner issues; permanent generator no feasible. Evaluating alternate backup power solution. The generator initially procured for this location will be moved to Enzweiller Pump Station.	2014	n/a	Evaluating Solutions
Stillwater	East	Permanent Generator	Property owner issues; permanent generator no feasible. Evaluating alternate backup power solution. The generator initially procured for this location will be moved to Cedar Pump Station.	2014	n/a	Evaluating Solutions

Pump Station Backup Power Plan

CIP Title	Basin	Original Proposed Solution	Updated Proposed Solution	Scheduled Completion Date	Actual Completion Date	Status Description As of December 2010
Category 4 Projects (50 total projects)						
Banklick	Central	Permanent Generator	n/a	2009-2014	2009	Complete
Cedar	Central	Permanent Generator	n/a	2009-2014	2009	Complete
Fowler Ridge	Central	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014	2010	Complete
Lassing Green	West	Permanent Generator	n/a	2009-2014	2009	Complete
Leathers Rd	Central	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014	2010	Complete
Marshall Rd	Central	Permanent Generator	n/a	2009-2014	2010	Complete
Mineola Pike	North	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014	2010	Complete
Newport Steel Mill	East	Permanent Generator	n/a	2009-2014	2009	Complete
Paul Rd	East	Permanent Generator	Portable Generator	2009-2014	2010	Complete
Rosewood Lane	East	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014	2010	Complete
Shadow Lake	East	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014	2009	Complete
Wolf Rd	Central	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014	2009	Complete
Air Park West	North	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Arbortech	North	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Arborwood	North	Permanent Generator	Property owner issues; permanent generator not feasible. Evaluating alternate backup power solution.	2009-2014	n/a	Evaluating Solutions
Brandtly Ridge	Central	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Brentwood	North	Permanent Generator	Property owner issues; permanent generator not feasible. Evaluating alternate backup power solution.	2009-2014	n/a	Evaluating Solutions
Brushup Lane	West	Permanent Generator	PS Elimination	2009-2014		Project In-Progress
Carlisle Ave	East	Permanent Generator	n/a	2009-2014	n/a	Evaluating Solutions
Cinnamon Ridge	West	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Cold Spring Crossing	East	Permanent Generator	n/a	2009-2014	n/a	Evaluating Solutions
Cold Spring Plaza	East	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Darma Ct	East	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014		Project In-Progress
Deer Creek No. 1	North	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014		Project In-Progress
Deer Creek No. 2	North	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014		Project In-Progress
Eighth Street	Central	Connect to Grid Power	n/a	2009-2014	n/a	Initial Project Analysis
Gerrard Ave	East	Permanent Generator	Portable Generator	2009-2014		Project In-Progress
Golf Course	Central	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Hampton Ridge	West	Permanent Generator	Property owner issues; permanent generator not feasible. Evaluating alternate backup power solution.	2009-2014	n/a	Evaluating Solutions
Harrison Harbor	East	Permanent Generator	Portable Generator	2009-2014		Project In-Progress

Pump Station Backup Power Plan

CIP Title	Basin	Original Proposed Solution	Updated Proposed Solution	Scheduled Completion Date	Actual Completion Date	Status Description As of December 2010
Category 4 Projects (continued)						
Harvest Hill	Central	Permanent Generator	PS Elimination Study	2009-2014	n/a	Under analysis to be eliminated by means of gravity sewer.
ICH	Central	Permanent Generator	Property owner issues; permanent generator not feasible. Evaluating alternate backup power solution.	2009-2014	n/a	Evaluating Solutions
IDI	North	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Independence Station Rd	Central	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2009-2014		Project In-Progress
Jefferson Ave	East	Permanent Generator	Portable Generator	2009-2014		Project In-Progress
Jericho Rd	Central	Permanent Generator	Property owner issues; permanent generator not feasible. Evaluating alternate backup power solution.	2009-2014	n/a	Evaluating Solutions
Jonathan	West	Permanent Generator	Property owner issues; permanent generator not feasible. Evaluating alternate backup power solution.	2009-2014	n/a	Evaluating Solutions
Litton	North	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Ohio Ave	East	Permanent Generator	Portable Generator	2009-2014		Project In-Progress
Orchard Estates	West	Permanent Generator	n/a	2009-2014	n/a	Evaluating Solutions
Parkside No. 2	East	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Patton Street	Central	Dual Utility Power Feed	n/a	2009-2014	n/a	Initial Project Analysis
Ria Vista	North	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
Silver Grove	East	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis
St Annes	East	Permanent Generator	n/a	2009-2014	n/a	Evaluating Solutions
Sycamore	West	Permanent Generator	Property owner issues; permanent generator not feasible. Evaluating alternate backup power solution.	2009-2014	n/a	Evaluating Solutions
Taylor Mill Rd	Central	Permanent Generator	Property owner issues; permanent generator not feasible. Evaluating alternate backup power solution.	2009-2014	n/a	Evaluating Solutions
Wilder	East	Permanent Generator	n/a	2009-2014	n/a	Evaluating Solutions
Wyndemere	North	Permanent Generator	Portable Generator	2009-2014	n/a	Evaluating Solutions
Youell Rd	West	Permanent Generator	n/a	2009-2014	n/a	Initial Project Analysis

Pump Station Backup Power Plan

CIP Title	Basin	Original Proposed Solution	Updated Proposed Solution	Scheduled Completion Date	Actual Completion Date	Status Description As of December 2010
Category 5 Projects (6 total projects)						
Keavy	Central	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2010-2015	2010	Complete
Meadow Lane	Central	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2010-2015	2009	Complete
Cardinal Cove	North	Permanent Generator	n/a	2010-2015	n/a	Initial Project Analysis
Crestview	East	PS Elimination Study	n/a	2010-2015	n/a	Evaluating Solutions
Ripple Creek	East	PS Elimination Study	PS Elimination	2010-2015	2010	Complete (As of 12/31/2010)
Winters Lane No. 2	East	Permanent Generator	n/a	2010-2015	n/a	Initial Project Analysis
CIP Title	Basin	Original Proposed Solution	Updated Proposed Solution	Scheduled Completion Date	Actual Completion Date	Status Description As of December 2010
Category 6 Projects (5 total projects)						
Enzweiller	East	Permanent Generator	n/a	2012-2015	2009	Complete
Mafred	Central	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2012-2015	2009	Complete
Ridgeway	Central	Permanent Generator	Backup Dry Prime Pump with a Diesel Engine	2012-2015	2009	Complete
Richwood	West	Permanent Generator	n/a	2012-2015	n/a	Initial Project Analysis
Twin Lakes	Central	Permanent Generator	n/a	2012-2015	n/a	Initial Project Analysis

Progress Summary	Number
2007 Complete Projects	4
2008 Complete Projects	8
2009 Complete Projects	24
2010 Complete Projects	11
2011 Active/Complete Projects	13
Total Project Activity	60