



Kingsbury Utilities Corporation

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FILED

March 23, 2018

INDIANA UTILITY

REGULATORY COMMISSION

May 6, 2006

Terry Ressler, Enforcement Case Manager
Indiana Department of Environmental Management
Office of Enforcement – Mail Code 60-02
100 North Senate Avenue
Indianapolis, IN 46204-2251

Re: Letter of March 21, 2006 Requiring Installation of an Influent Flowmeter

Dear Mr. Ressler,

In the letter of March 21, 2006, IDEM required Kingsbury Utility Corporation (KUC) to install an influent flowmeter within 60 days of receipt of the letter.

By this letter, KUC requests technical assistance in the matter of the installation of an influent flowmeter. KUC still is opposed to this requirement and reiterates that the difficulties discussed in our feasibility study were not addressed in the letter requiring KUC to proceed with installation. Our feasibility study noted that:

- 1) Since there is no influent meter in the treatment plant design, there are no suitable location in the influent sewer where there is available head to install a meter
- 2) Due to the very large diameter influent sewer (24") and low influent flows (less than 100,000 gpd), the existing velocities in the influent sewer are insufficient to provide for accurate metering.
- 3) Any device installed in the influent sewer will cause a head loss and will gather solids, resulting in inaccurate measurements. Additionally, we believe that IDEM would not even approve construction of a 24" sewer for the current flows without an additional maintenance commitment letter.

In the spirit of compliance with IDEM's request, KUC invited its "flow meter consultant" (JGI) to examine our facility and provide guidance and a quotation to install a meter. JGI agreed with the above observations and our feasibility analysis that influent flow monitoring was impractical. In our meeting and site visit, the following installations were considered:

- a. A 10" Palmer-Bowlus flume in the 24" influent sewer. It was concluded that too little head is available for free flow for this option. Also, the "step" in the flume will result in solids deposition and inaccurate measurement.

- b. An H-Flume at the end of the 24" influent sewer. Again, too little head is available for free flow conditions and inaccurate measurements would result.
- c. An "open channel mag meter" (ABB Parti-Mag). Velocities are too low for accurate flow measurement with this instrument
- d. A "radar/level meter". Again, existing velocities are below the meter rating.
- e. A "magmeter" at the discharge of the primary pumps. At this point in the treatment facility, the flow is already a combination of the raw and recirculated flow.
- f. JGI did note that the flow from the #1 Trickling Filter to the #2 Trickling Filter could be accurately measured utilizing an H-Flume, however this location is halfway through the process, and may not meet IDEM's request.

We again want to reiterate that the addition of a new influent flow meter will result in little or no additional knowledge for the following reasons:

- a. The influent wastewater flow to the facility cannot be bypassed since all bypasses are permanently sealed.
- b. There is no wastewater storage within the facility and any peak flows resulting from a "batch discharge" will be charted by the effluent flow meter within minutes of entering the facility.

In summary, short of major construction to reroute the influent sewer and/or modification of the raw wastewater wetwell, it is difficult for us to see how an influent flow meter could be installed and perform reasonably. It is our opinion that the expense of purchasing and installing a raw influent flow meter is not prudent, nor will add any efficiency in operating the plant.

We hope that IDEM will reconsider its request to install an influent flow meter and determine that the installation is not "feasible". This will also allow us to better utilize our monies elsewhere. Barring a waiver of this request, please provide further information and technical guidance describing the meter installation and IDEM's thought process on how any meter installed will provide accurate readings and improve the facility's operational efficiency in meeting its effluent permit parameters. Additionally, if a meter is required, would any meter installation drawings need to be approved by IDEM's construction section?

If you have any questions or require any additional information, please feel free to contact me or our Certified Operator Jerry Jackson (219-362-2354).

Sincerely,
KINGSBURY UTILITY CORPORATION

Jeffery Johnson, President