

Jefferson County  
Raintree Plantation Subd.

DNR Exhibit No. 24  
Date 12/2/06 Case No. 567051-071  
Reporter [Signature]

**MEMORANDUM**

**FILED<sup>3</sup>**

JAN 22 2007

Missouri Public  
Service Commission

DATE: June 7, 2005  
TO: File  
FROM: Jim Rhodes, EE, SLRO  
SUBJECT: Raintree Chronology

The following is to provide a chronology of significant events, correspondence, etc. with regard to the wastewater treatment and collection system operated by the Central Jefferson County Utility Company in the Raintree Plantation Subdivision.

<u>Date</u>	<u>Action</u>
Oct. 23, 1996:	Construction permit #22-5094 issued for a 2 <sup>nd</sup> clarifier at the WWTF. Clarifier was needed to handle the flows being received.
Oct. 16, 1998:	Inspection report by Stuart Bean of SLRO noted "no aquatic life for at least three hundred feet below the plant's outfall." The report also noted that the operator, Roger Phibbs, claimed somebody was dumping some toxic substance in the sewers which killed the bacteria in the plant.
Jan 20, 1999:	Reinspection by Stuart Bean. Conditions at both the treatment plant and in the receiving stream appeared to have improved.
May 20, 1999:	Reinspection by Stuart Bean. "The receiving stream looked better than it has in probably a couple of years." The treatment plant was also running well.
July 2, 1999:	Missouri Operating permit MO-0099473 issued. Expiration date is July 1, 2004. Design flow is 64,000 gpd.
March 21, 2001:	NOV #1680 issued due to bypass. Roger Phibbs followed up with a letter to say the bypassing condition (which occurred Feb 18) was corrected by Feb 19. Bypass was due to a blockage in the collection system near a lift station.

<u>Date</u>	<u>Action</u>
April 4, 2001:	Received copy of letter from Leonard Burst, President of the Raintree Property Owners Association (POA) to Central Jefferson County Utility Company (CJCUC) regarding concerns of John Aycock, resident and past POA President, with the Raintree wastewater treatment system. Mr. Aycock's report noted many problems with the Raintree infrastructure and requested to meet with the CJCUC.
Aug. 21, 2001:	Sewer extension # 22-6191 issued for three lots in Raintree.
Sept. 27, 2001:	Sewer extension # 22-6221 issued to serve 16 lots.
Nov. 21, 2001:	Sewer extension # 22-6245 issued for 31 lots.
March 8, 2002:	Sewer extension # 22-6281 issued for 16 lots.
April 2, 2002:	Sewer extension # 22-6310 issued for 12 lots.
April 19, 2002:	Sewer extension # 22-6299 issued for 17 lots.
June 5, 2002:	Sewer extension # 22-6342 issued for five lots.
Sept. 3, 2002:	Sewer extension # 22-6375 issued for 15 lots.
Oct. 15, 2002:	Sewer extension # 22-6428 issued for five lots.
Oct. 17, 2002:	Sewer extension # 22-6405 issued for nine lots.
April 30, 2003:	J. Rhodes sent letter to CJCUC regarding apps for sewer extensions (# 14, 15, & 16) to serve 11 lots. J. Rhodes stated the plant was hydraulically overloaded and WWTF was receiving 80,000 gpd on the average. J. Rhodes said that we would approve this application but warned that "future sewer extensions may be placed on hold pending review of the wastewater facility to accept such flows."
May 23, 2003:	Response to 4/30/03 letter from Fribis Engineering stating they had been retained by CJCUC to design a WWTF upgrade.
June 13, 2003:	Sewer extension # 22-6505 for Raintree extensions 14, 15, & 16 issued.
June 13, 2003:	Sewer extension # 22-6538 for Raintree extensions 17-20 for 39 lots issued.
June 27, 2003:	Letter received from Fribis Engineering re: WWTF upgrade. They said they would have a report ready sometime in August 2003.

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July 29, 2003:	Sewer extension # 22-6560 for Raintree ext. #21 issued for eight lots.
Oct. 27, 2003:	Sewer ext. # 22-6612 (Raintree # 21) issued for 15 lots issued.
Feb. 9, 2004:	Applications for Raintree extensions #24, 25, 26 & 27 returned due to lack of report or plans from CJCUC or Fribis Engineering to upgrade WWTF.
Feb. 19, 2004:	Preliminary Engineering Report received from Fribis Engineering.
March 15, 2004:	Inspection report by Stuart Bean based on Feb. 9, 2004 inspection. Report noted "a significant amount of solids . . . in the receiving streambed below the outfall for approximately 80 feet or more." Report also stated "It was reported that the treatment plant washes out about three times each year due to inflow and infiltration (I & I).
March 15, 2004:	Application for 200,000 gpd treatment plant upgrade received with \$750 fee.  Plans and specs and a water quality impact study were also received.
April 8, 2004:	Response to Mar. 15, 2004 inspection report (prepared by Fribis Engineering) was received and it stated the reasons for the problems that were noted and what would be done to correct the problems.
April 21, 2004:	Sewer extensions # 22-6767, 22-6768, and 22-6769 for Raintree sewers 24, 25, 26, & 27 were issued for a total of 53 lots.
May 27, 2004:	Letter sent from J. Rhodes to Roger Phibbs stating that applications for Raintree extensions 28 through 33 for 76 lots would not be approved unless CJCUC could somehow comply with CWC sewer extension policy 82-1.
June 3, 2004:	Letter from Dana Hockensmith received in response to 5/27/04 letter from J. Rhodes stating only six homes would be added to the system as a result of the extensions.
June 15, 2004:	Letter from M. Alhalabi (written by J. Rhodes) to Roger Phibbs in response to 6/3/04 letter from Dana Hockensmith and also to comment on Fribis engineering plans. Thirteen points were listed.
June 21, 2004:	Letter from John Aycock to Jefferson County Commissioner Mark Mertens re: Raintree recommending a moratorium on issuance of new building permits in Raintree.
June 29, 2004:	Meeting with Roger Phibbs, Dana Hockensmith, Ken McClain, William Lavrrar, Tom Siegel and the writer was held at SLRO to discuss issues.

<u>Date</u>	<u>Action</u>
July 12, 2004:	Letter from John Aycock to J. Rhodes received. Mr. Aycock said that he had discussed the possibility of a moratorium on new building permits with Commissioner Mertens and Mr. Mertens said Jefferson County would not act unless requested to do so by DNR.
July 20, 2004:	Letter sent from J. Rhodes to Roger Phibbs to follow-up June 29 mtg. regarding possibility of a sewer moratorium.
Aug. 17, 2004:	Letter from Dana Hockensmith received stating CJCUC had signed a "letter of intent" with Aqua Missouri to sell the system to them. The letter also referred to a meeting to be held at SLRO on Aug. 23, 2004. Note: At this point, plans by Fribis Engineering are no longer under consideration since Aqua Missouri intended to use their own engineers.
Aug. 23, 2004:	Meeting held at SLRO. In attendance were J. Rhodes, Aimee Davenport, and Tom Siegel with SLRO, Terry Rakocy and Tena Hale-Rush with Aqua-Missouri, and Dana Hockensmith, Jeremiah Nixon, Kenny McClain from CJCUC. Issues discussed was sale of CJCUC to Aqua-Missouri, DNR procedures for issuance of construction permit, new sewer extensions and conditions of receiving stream.
Sept. 1, 2004:	Inspection of Raintree WWTF and receiving stream by Stuart Bean and Scott Goodin. Condition of Galligher Creek was documented. Samples were collected.
Sept 13, 2004:	Letter sent from Dana Hockensmith to Aimee Davenport regarding new sewer extensions and enclosed a list of 47 lots which CJCUC would limit connections to if approved.
Sept. 24, 2004:	Received lab results of 9/1/04 sample collection. BOD was 16 mg/L and TSS was 8 mg/L.
Sept. 27, 2004:	Certified letter from Mohamad Alhalabi to Kenneth McClain regarding 9/1/04 stream survey and informing Mr. McClain of the results. NOV #2072 SL was attached.
Sept. 28, 2004:	Letter from Dana Hockensmith to Aimee Davenport re: sewer connections. Ms. Davenport stated the CJCUC Board of Directors had met on 9/27/04 and had decided to move forward with the plan in his 9/13/04 letter.

<u>Date</u>	<u>Action</u>
Sept. 28, 2004:	Letter received from "A concerned citizen" stating that "There is a homebuilder in Jefferson County at Raintree Plantation who is tapping into the current sewer system."
Sept. 30, 2004:	Letter from Aimee Davenport to Dana Hockensmith stating we would not accept the plan outlined in Mr. Hockensmiths Sept. 13 letter and that new connections would result in violations of Missouri's Clean Water law.
Sept. 30, 2004:	Letter sent from Mohamad Alhalabi to Roger Phibbs returning applications for sewer extensions 24 through 33. Also, the letter stated we were still waiting for a formal response to June 15, 2004 letter to Roger Phibbs.
Nov. 18, 2004:	J. Rhodes and Stuart Bean investigated another complaint about people tapping into the Raintree sewer system. The complaint turned out to be correct. Samples were collected from the treatment plant.
Nov. 23, 2004:	Letter from Mohamad Alhalabi to Roger Phibbs regarding the connection and requesting "as-built" drawings.
Dec. 7, 2004:	Letter received from Dana Hockensmith regarding the connection and stating the connection was a lateral connection only.
Dec. 7, 2004:	Lab report for 11/18/04 sample was received. TSS was 6.0 mg/L.
Dec. 28, 2004:	Letter sent from Mohamad Alhalabi to Dana Hockensmith informing him that CJCUC "must cease any additional connections to the treatment plant until after the treatment system has been expanded."
Dec. 29, 2004:	Enforcement Action Request sent from SLRO to Kevin Mohammadi.
Jan 7, 2005:	Meeting at SLRO with Tom Siegel, Mohamad Alhalabi, and J. Rhodes from SLRO; State Rep. Belinda Harris; Dana Hockensmith, Roger Phibbs, and Ken McClain from CJCUC; Charles Winger from Missouri State Bank; William Lavrrar from Fribis Engineering; and Rick Avila (Alpha-Omega Construction and prospective new owner of CJCUC). At the meeting Fribis Engineering outlined plans for a new treatment system.
Feb. 16, 2005:	Letter from J. Rhodes to Roger Phibbs regarding effluent limits for a new system and asking for a new water quality study and a new WQRS due to increase in design flow from 200,000 gpd to 400,000 gpd. Also, a new application form was requested.

<u>Date</u>	<u>Action</u>
Mar. 3, 2005:	Meeting at SLRO with Rober Phibbs of CJCUC; William Lavrrar and Josiah Cox from Fribis Engineering; Rick Avila; and J. Rhodes and Tom Siegel from SLRO to discuss plans for a new WWTF. New plans & specs were provided by Fribis Engineering for 400,000 gpd facility.
March 4, 2005:	Letter from W. Lavrrar, Fribis Engineering to J. Rhodes summarizing 3/3/05 meeting and stating that target date for public notice was 3/18/05.
Mar. 18, 2005:	WQRS prepared by John Hoke, WPB.
March 18, 2005:	Letter from Dana Hockensmith to Aimee Davenport in response to 3/10/05 letter from Ed Galbraith and disputing alleged violations of MDNR water quality standards.
March 28, 2005:	Revised WQRS prepared by John Hoke of WPB.
March 30, 2005:	Letter from J. Rhodes to Rick Avila of CJCUC with comments on plans as prepared by Fribis Engineering.
April 4, 2005:	Public notice of draft operating permit.
April 12, 2005:	Letter from Stanley D. Schnaare to J. Rhodes regarding spillway and dam and need for work on such, and possible interference with WWTF expansion.
April 14, 2005:	J. Rhodes met with William Lavrrar of Fribis Engineering to discuss issues raised in March 30, 2005 letter. Revised plans received.
April 26, 2005:	Letter from Hillsboro regarding possibility of offloading up to 200 homes now on Raintree system temporarily to Hillsboro WWTF.
May 5, 2005:	End of public notice period.

JAR/ka