TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
711 R. S. GASS BOULEVARD
NASHVILLE, TENNESSEE 37243
PHONE (615) 687-7000 STATEWIDE 1-888-891-8332 FAX (615) 687-7078

May 17, 2011

CERTIFIED MAIL
7008 1300 0000 1051 0990

Mr. Pat Hickey, General Manager
Clarksville Gas & Water
2215 Madison Street
Clarksville, Tennessee 37041

Re: **Notice of Violation**
Compliance Evaluation Inspection
Clarksville Water Treatment Plant
NPDES Permit No. TN0074004
Montgomery County

Dear Mr. Hickey:

On May 5, 2011, I conducted a compliance evaluation inspection of the wastewater treatment system serving the Clarksville Water Treatment Plant (WTP). I met with Kenny Vaughan, WTP Superintendent, Phil Whittinghill, WTP Operations Supervisor and various other WTP personnel. My observations and comments are as follows:

1. The discharge monitoring reports (DMRs) for 2010 and January through March 2011 were reviewed. No violations of the permit limits were identified.

2. Wastewater is generated from filter backwash and sedimentation basin washwater. This wastewater is pumped to either the sludge holding basin or one of the two equalization basins. Discharge to the Cumberland River is from the sludge holding basin. The sludge is disposed of at the Barge Point Road site of the proposed North Clarksville WTP. It was not clear if site approval had been obtained for disposal of the WTP sludge at this location. Erich Webber, Division of Water Supply (DWS) (615-687-7060) should be contacted for further information.

3. Monitoring for and a limit for total iron was added to the notice of coverage issued August 24, 2010. If the WTP doesn't use any iron removal chemicals in the water treatment process, then analysis for iron is not required. This parameter may then be marked as not applicable or NA on the DMR forms.

4. The analyses for all permit parameters are run at the Clarksville WTP. The records for sample collection and analysis were incomplete. The date, time and person collecting the sample were not noted in the records. A chain of custody form should be prepared for sample collection and copies retained for at least three (3) years as required by the permit. Deficiencies in the records for the various analyses are noted below.

5. Calibration checks were not performed prior to total residual chlorine (TRC) analysis. Calibration checks must be performed prior to TRC analysis using at least two standards that will bracket the anticipated sample value.

   The sample results are being reported as 0 on the DMR forms. When an actual result is displayed on the colorimeter, it should be recorded on the bench sheet and reported on the DMR form. Results which are less than (<) 0.05 mg/L may be reported as below detection level (BDL) or <0.05 as stated in the permit.

6. The pH meter is calibrated with 2 standards daily. The slope is determined and recorded on the bench sheet. However, the buffers used in the calibration were not documented.

   The time and person performing the instrument calibration should also be recorded to comply with the permit requirements.

7. The total suspended solids and settleable solids records did not provide any information that would confirm that the analyses had been performed. All information, including weights of filters, used in determining sample results should be recorded and retained as required by the permit.

8. The analysis for total aluminum is performed using the Hach method 8012. This method is not approved by EPA for wastewater analyses. The Hach Company provides a list of all the methods that they offer that are approved by EPA for water and wastewater analyses. The 40 CFR, Part 136 (volume 40 of the Code of Federal Regulations, part 136) should be also consulted for the appropriate method. Equipment and reagents used to perform this analysis by one of the EPA approved methods listed in 40 CFR, Part 136 should be obtained. If the operator is uncomfortable in performing the required analyses, another laboratory can be contracted.

9. Mr. Vaughan stated that the outfall sign was mounted on the river side of water intake structure. As such, it was not visible at the time of the inspection. Mr. Vaughan was asked to confirm the phone numbers for both the permittee and the Division of Water Pollution Control from the sign to ensure compliance with the permit.

The failure to maintain adequate records to properly document all wastewater sampling and analysis, the failure to conduct the analysis for total aluminum using an EPA approved method and the failure to follow approved analytical procedures for TRC are violations of your NPDES permit, and therefore violations of the Tennessee Water Quality Control Act (T.C.A. 69-3-101 et. seq.). This letter will serve as a formal **Notice of Violation** and will inform our Enforcement Section of the violations. This NOV is not a legal action in itself, but such violations may lead to enforcement action. It is requested that a written response be provided to this office within thirty (30) days of receipt of this letter, stating what steps will be taken to address the violations and deficiencies.

If you have any questions, or if I can be of further assistance, please contact me by phone at 615/687-7127 or by e-mail at *Mike.Thornton@tn.gov*.

Sincerely,

Michael R. Thornton
Division of Water Pollution Control

cc: Kenny Vaughan, WTP Superintendent, Clarksville Gas & Water
Erich Webber, DWS – Nashville Environmental Field Office

United States Environmental Protection Agency
Washington, D. C. 20460

Water Compliance Inspection Report

Section A: National Data Coding (i.e., PCS)

Transaction	Code	NPDES	yr / mo / dy	Inspection Type	Inspector	FacType
1 N	2 5	3 TN0074004 11	12 110505 17	18 C	19 S	20 2

Remarks

21 _____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 ___ 69	70 4	71 N	72 N	73 ___ 74 75 ___ 80

Section B: Facility Data

Name and Location of Facility Inspected (*For industrial users discharging to POTW, also include POTW name and NPDES permit number*)	Entry Time / Date	Permit Effective Date
Clarksville WTP 1040 Pumping Station Road Montgomery County	5/5/11	8/24/10
	Exit Time / Date	Permit Expiration Date
	5/5/11	6/30/15

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Kenny Vaughan, WTP Superintendent 931-553-2440
Phil Whittinghill, WTP Operations Supervisor 931-553-2440

Name, Address of Responsible Official/Title/Phone and Fax Number

Pat Hickey, General Manager 931-645-1857
Clarksville Gas & Water
2215 Madison Street
Clarksville, Tennessee 37041

Contacted ☐ Yes ☒ No

Other Facility Data (*e.g., SIC NAICS, and other descriptive information*)

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☒ Permit	☒ Self-monitoring Program	☐ Pretreatment Program	☐ MS4
☒ Records / Reports	☐ Compliance Schedule	☐ Pollution Prevention	
☒ Facility Site Review	☒ Laboratory	☐ Storm Water	
☒ Effluent / Receiving Waters	☒ Operation & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling / Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
B 0 0 4 1	Failure to maintain records
C 0 0 1 8	Improper analysis - total Al

see attached letter

Name (s) and Signature(s) of Inspector(s)	Agency / Office / Phone and Fax Numbers	Date
Michael R Thornton	Tennessee Division of Water Pollution Control Nashville Environmental Field Office 615/687-7127 / 615/687-7078 (FAX)	5/16/11
Signature of Management Q A Reviewer Ann E. Rochelle	Agency / Office / Phone and Fax Numbers Tennessee Division of Water Pollution Control Nashville Environmental Field Office 615/687-7000 / 615/687-7078 (FAX)	Date 5/17/11

Facility Name: **Clarksville WTP** Permit #: **TN0074004**

County: **Montgomery**

Year	Month	Flow, max	pH, min	pH, max	TSS	Settleable S	Aluminum	Total Chlorine	Total Irom
		MGD	S.U.	S.U.	mg/L	mg/L	mg/L	mg/L	mg/L
2010	Jan	0.481	7.68	7.68	1.3	BDL	0.154	0	
	Feb	0.704	7.42	7.42	1.2	BDL	0.077	0	
	Mar	0.704	7.28	7.28	1	BDL	0.071	0	
	Apr	0.353	7.54	7.54	0.8	BDL	0.059	0	
	May	1.405	7.19	7.19	3	BDL	0.087	0	
	Jun	0.866	7.28	7.28	1.4	BDL	0.033	0	
	Jul	2.862	7.3	7.3	0.9	BDL	0.019	0	
	Aug	0.767	7.1	7.1	2	BDL	0.057	0	
	Sep	0.391	7.3	7.3	2.6	BDL	0.079	0	
	Oct								
	Nov	0.47	7.9	7.9	2.2	BDL	0.149	0	
	Dec	0.751	7.2	7.2	0.8	BDL	0.057	0	
2011	Jan	0.386	7.4	7.4	0.9	BDL	0.064	0.0	0.01
	Feb	0.345	7.4	7.4	1.0	BDL	0.055	0.0	0.00
	Mar	0.751	7.2	7.2	1.1	BDL	0.044	0.00	0.00
	Apr								
	May								
	Jun								
	Jul								
	Aug								
	Sep								
	Oct								
	Nov								
	Dec								
Actual Avg.		0.803	7.1						
Actual Max.		2.862		7.9	3.0	0.0	0.15	0.00	0.01
Pmt. Avg. Limit			6.0 min						
Pmt. Max Limit				9.0	40.0	0.5	10.0	1.0	10.0
Mon. Freq.		1/month	1/month	1/month	1/month	1/month	1/month	1/month	1/month
VIOLATIONS									