STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COOKEVILLE ENVIRONMENTAL FIELD OFFICE
DIVISION OF WATER RESOURCES
1221 SOUTH WILLOW AVENUE
COOKEVILLE, TN 38506
PHONE 931-432-4015 STATEWIDE 1-888-891-8332 FAX 931-432-6952

The Honorable Sam Gibson
Mayor, City of Byrdstown
P.O. Box 325
109 West Main Street
Byrdstown, TN 38549

March 3, 2016

RE: Compliance Evaluation Inspection (CEI), City of Byrdstown Wastewater Treatment Plant; NPDES TN0062626, Permit Expiration June 30, 2019

Dear Mayor Gibson:

Division of Water Resources staff wishes to thank you, Mr. Dennis South, and Mr. Jack Huddleston for your generous time and courtesy during the recent Compliance Evaluation Inspection (CEI) on February 19, 2016, at the City of Byrdstown Wastewater Treatment Facility in Pickett County.

Permit

The current NPDES permit became effective on June 1, 2014 and the current NPDES permit will expire on June 30, 2019. The permit limits are maintained in the laboratory. The complete NPDES permit was on file. The single outfall is at the tributary stream bank above a small waterfall that eventually flows into Town Creek. The NPDES outfall sign was in place.

Records and Reports

The facility's Monthly Operational Reports (MORs) are mailed to the Cookeville Environmental Field Office. The original MORs are stored at the facility. The reports are received in a timely fashion. Reported collection system overflows occur at the "County Highway Department" pump station during large rain events. Self-reported E.coli violations have occurred in 2014 and 2015. The Integrated Compliance Information System (ICIS) report which records this laboratory data on a federal data base is attached. Nine (9) E.coli violations have occurred since the last permit issuance.

Facility Site Review

The facility was clean. The right side batch reactor actuator arm was in the process of repair. The repair was completed shortly after this inspection. The Ultra Violet bulbs in the disinfection system were recently replaced. Bio-solids removal is being performed in a timely fashion.

Effluent and Receiving Waters

The receiving waters were found to be in good condition. The effluent was observed and it was clear. Biological sampling by the cities contractor was briefly discussed. Areas along the stream were discussed with regard to the permit required biological macro-invertebrate sampling event.

Laboratory

Laboratory hygiene is very good. It is strongly recommended that the city provide additional laboratory training to the operators in order to further develop the laboratory QA/QC program.

Operations and Maintenance

The facility is well maintained. Maintenance on the right basin's actuator arm was in process and subsequently repaired. U.V. bulbs were recently replaced. Operators take a proactive approach to performing maintenance before a break down occurs. Various replacement machine parts are maintained on the premises.

Summary

Operators continue to demonstrate professional development, involvement and interest in their good work. Operators are furthering their knowledge in the electronic reporting process (eDMRs). Regarding reported E.coli violations, care should be given to assess any issues with the effluent disinfection system (Ultra-Violet). This should be done in order to reduce and eliminate these bacterial violations. Overflows occur at the County Highway Department Pump Station during heavy rain events. A stream conveyance is adjacent to this pump station and is directly impacted by the overflows. For this reason the City should attempt to reduce inflow and infiltration (I&I) into the City's sewer collection system specifically above or upstream in the sewer collection system of this pump station.

Recommendations

- ✓ Please investigate possible causes for E.coli violations. It is likely that the recently installed new U.V. bulbs will have resolved this issue.
- ✓ Please investigate causes for excessive inflow of stormwater into the city's sewer system. Repairs will reduce the city's energy costs, pump maintenance costs and ultimately improve water quality.
- ✓ Please continue to increase laboratory QA/QC knowledge through the operator's attendance of laboratory courses at the Fleming Training Center in Murfreesboro.
- ✓ A new computer for the wastewater facility should be considered and possibly budgeted as electronic reporting is now being implemented statewide.

The Division of Water Resources would again like to thank you, Mr. Dennis South and Mr. Jack Huddleston for your time and courtesy during this inspection.

If you have any questions, you may contact Oakley Hall in Cookeville by way of telephone at (931) 432-7635 or toll free at 1-(888)-891-8332. You may also use electronic mail at: Oakley.Hall@tn.gov.

Sincerely,

Johnny K. Walker
Environmental Program Manager III
Division of Water Resources
Cookeville Environmental Field Office

Enclosure: Water Compliance Inspection Report; Integrated Compliance Information System (ICIS) Report
cc: EFO-CK, Pickett County DWR Files: TN0062626

TDEC - Division of Water Resources
Cookeville Field office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TN0062626	Facility Site Name	City of Byrdstown Wastewater Treatment Plant
		Address	P.O. Box 325, 109 West Main Street, Byrdstown, TN, 38549
Permit Eff. Date:	Jun 1, 2014	Permit Exp Date:	Jun 30, 2019
		SIC Code:	

Compliance Monitoring Information

Compliance Monitoring Activity Name: Compliance Evaluation (non-sampling) (CEI)

* If Bio Monitoring is selected above, select the method used:

Compliance Monitoring Activity: Evaluation

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm): February19, 2016, 11:00 AM

Exit Date/Time (mm/dd/yyyy hh:mm): February 19, 2016 at 3:00 PM

Facility Representatives

On-Site Representative(s)Title, Phone Number	Responsible Official(s), Title, Phone Number
Dennis South, Chief Operator - Superintendent; 931.864.3748	Mayor Sam Gibson; 931.864.6215

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)		
Compliance Monitoring Reason:	Core Program		
Compliance Monitoring Agency Type:	State	Agency Name:	TDEC - DWR
Did EPA assist/ Inspection?	No	Time Physically conducting activity: Days:	2 Hours: 0
Inspection Type:	State	Compliance Monitoring Action Outcome:	No Violation
Lead Agency:	State	Compliance Monitoring Rating Code:	Unrated

If Joint Inspection, what was the purpose of the other party?

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

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

Compliance Monitoring Summary

The electronic DMR was discussed. The right decanter (actuator arm) was in the process of maintenance. Parts for the device were on order. Subsequently the device was repaired on the following week, (2.22.16). The effluent discharge was clear. The U.V. bulbs were recently replaced. Biological sampling of the stream was discussed.

EPA and State Representatives

William Oakley Hall	TDEC - DWR / Cookeville at (931) 432 - 7635	Mar 2, 2016
Inspector's Signature	Agency / Office / Phone	Date
Johnny K. Walker	TDEC - DWR / Cookeville at (931) 432 - 4015	Mar 2, 2016
Manager's Signature	Agency / Office / Phone	Date

ICIS
Integrated Compliance Information System

NPDES AIR Admin Reports Help WILLIAM_HALL Logout

SearchViolations > Search Results

ADD SINGLE EVENT VIOLATION

Record Numbers 1 to 9

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	04/30/2014			
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	08/31/2014			
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	10/31/2014			
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	02/28/2015			
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	03/31/2015			
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	05/31/2015			
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	10/31/2015			
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	11/30/2015			
Effluent Violation	001 G 31648 E. coli, MTEC-MF Effluent Gross Season ID:0 C3	E90	01/31/2016			

Record Numbers 1 to 9