



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COLUMBIA ENVIRONMENTAL FIELD OFFICE
1421 HAMPSHIRE PIKE
COLUMBIA, TENNESSEE 38401
PHONE (931) 380-3371 STATEWIDE 1-888-891-8332 FAX (931) 380-3397

June 18, 2021

Honorable Randy Burns, Mayor
City of Clifton
P.O. Box 192
Clifton, TN 38425

Certified Mail:9489 0090 0027 6315 6286 38
Return Receipt Requested

RE: Notice of Violation
Compliance Evaluation Inspection
NPDES Permit No.TN0061387
Clifton STP #1
Clifton, Wayne County, Tennessee

Dear Mayor Burns:

On May 25, 2021, Division of Water Resources personnel conducted a Compliance Evaluation Inspection (CEI) of the City of Clifton #1 Wastewater Treatment Plant. A CEI is conducted to determine compliance with the permit and to review the operation and maintenance of the treatment system. The Division would like to thank Mr. Clark and Mr. Teague for their time and cooperation during the inspection. The following observations were made during the inspection:

I. Permit

The current permit became effective on January 1, 2019, and shall expire on December 31, 2023.

II. Records/Reports

Discharge Monitoring Reports (DMRs) are being submitted using the NetDMR electronic reporting system. A review of the DMRs submitted since the previous inspection was conducted. The review indicated that permit violations were reported for the following:

November 2019 - Biological Oxygen Demand (BOD) percent removal
April 2020 - Biological Oxygen Demand (BOD) percent removal
March 2021 - 5-day Biological Oxygen Demand

These exceedances are violations of Clifton STP #1's NPDES permit. A written response is requested detailing the cause of the violations, as well as the corrective actions taken or planned to be taken to bring the plant back into compliance.

This letter serves as a formal Notice of Violation and by copy will inform the Division's Enforcement and Compliance Unit of the violations.

A Monthly Operations Report (MOR) is being submitted to the Columbia Environmental Field Office. There has been one overflow and one release reported from the collection system since the previous inspection. The facility is set up to begin reporting electronic MORs and has also registered as a user of the MyTDEC Forms website.

III. Laboratory

Analytical testing requirements of the permit are performed at the City of Clifton # 2 Wastewater Plant laboratory. Laboratory equipment calibrations and bench sheets for each monitoring parameter tested were available for review. Reagents used to calibrate the laboratory equipment were within their expiration dates. Annual equipment calibrations were conducted by Labtronix in March 2021.

IV. Facility Site Review and Operations and Maintenance

The City of Clifton #1 plant serves as a municipal treatment facility of domestic wastewater. The treatment system is 3-cell lagoon system with gravity flow between each cell. Each lagoon is equipped with two surface aerators. The third cell is the polishing pond where the effluent is disinfected and discharged to the Tennessee River. The grit removal shaft at the plant headworks is scheduled to be replaced. The sign posted at the outfall to the Tennessee River contains the information listed in the permit.

Shawn Teague is the certified operator for the treatment plant and has a Biological Natural Systems (BNS) wastewater certification. Austin Clark is the Public Works Director for the City of Clifton and has a Biological Natural Systems (BNS) wastewater certification and a Grade II wastewater collections system certification. These certifications meet the permit requirements for NPDES Permit No. TN0061387.

VI. Conclusion

Compliance with Clifton STP #1's NPDES permit, TN0061387, helps ensure discharges are protective of downstream fish and aquatic life and water quality. Please submit a written response to Gary Horne at the Columbia Environmental Field Office addressing item 2 above, **within 30 days** of receipt of this letter. Thank you for your efforts to ensure permit compliance and to protect state water quality. If you need assistance in matters concerning this report, please contact Gary Horne at (931) 222-9040 or by e-mail at gary.horne@tn.gov.

Mayor Burns
June 18, 2021
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Sincerely,

A handwritten signature in blue ink that reads "Sherry R. Glass". The signature is written in a cursive style with a large, prominent "S" at the beginning.

Sherry R. Glass
Environmental Manger
Division of Water Resources
Columbia Environmental Field Office

CC: Jessica Murphy, DWR Compliance & Enforcement Manager
Doug Kibbey, City Manager, City of Clifton
Austin Clark, Director of Public Works, City of Clifton
Shawn Teague, Certified Operator, Clifton Wastewater Treatment Plant