



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243-1102

September 14, 2023

The Honorable David Leckner  
Mayor  
City of Adamsville  
231 East Main  
Adamsville, TN 38310

SENT VIA ELECTRONIC MAIL TO: [d.leckner@cityofadamsville.com](mailto:d.leckner@cityofadamsville.com)

Re: Pretreatment Audit Inspection **Notice of Violation**  
Adamsville Pretreatment Program  
NPDES Permit No. TN0064785  
McNairy County

Dear Mayor Leckner:

The Division of Water Resources (Division) appreciates your staff's time on November 29, 2022, when Mr. Adam Bonomo, Ms. John Bowling, and Mr. Gordon Holcomb met with Mr. Jim Cooper and Mr. Garrett Pettigrew to conduct a Pretreatment Audit Inspection of Adamsville's industrial pretreatment program. The comments below are based on the results of the pretreatment audit.

1. Adamsville's Pretreatment Semi-Annual Report (SAR) for the April 1, 2022, to September 30, 2022, reporting was submitted to the Division on November 4, 2022. Review of the SAR indicated that the influent and effluent of the Adamsville Lagoon was not sampled during the reporting period as required by Part 3.2(d)(ii) of Adamsville's NPDES Permit. Therefore, this letter serves as a **Notice of Violation** for failure to perform the required influent and effluent sampling. The Division recommends that future semi-annual influent and effluent sampling occur early during the reporting period to ensure compliance with Adamsville's NPDES permit.
2. As part of the audit, Adamsville's significant industrial user (SIU) inspections for Masco Landfill (Masco) and Dan's Polishing Shop (DPS) were reviewed. Several inspection forms for both SIU's did not include a signature or date and inspection forms for 2021 and 2022 were missing altogether. Tennessee Rule 0400-40-14-.08(6)(b)(5) requires each industrial user to be inspected at least once every 12 months. Mr. Cooper indicated that both IUs were inspected on July 27, 2022, however, no documentation of the inspections could be found. Therefore, this letter serves as a **Notice of Violation** for failure to inspect each SIU once per year. Adamsville should update the SIU inspection forms to include a date and a signature and ensure that all future SIU inspections are documented in the pretreatment file for each SIU. Adamsville should ensure that the pretreatment files for each SIU are better organized and easily accessible for examination by Division staff on future compliance inspections.

3. Adamsville's SAR for the April 1, 2021, to September 30, 2021, reporting period indicated that DPS was in Significant Non-Compliance (SNC) due to a Technical Review Criteria violation for Cyanide. Tennessee Rule 0400-40-14-.08(6)(b)(8) requires SIUs in SNC to be published in the newspaper annually or within 12 months of being in SNC. During the inspection, it was determined that DPS was never published as being in SNC in the newspaper. Therefore, this letter serves as a **Notice of Violation** for failure to publish SIUs in SNC in the local newspaper. **Adamsville should take appropriate actions to provide public notice of DPS being in Significant Non-Compliance and provide proof of said public notice to the Division by November 10, 2023.**
4. During the audit, Adamsville's Sewer Use Ordinance was reviewed. The following comments pertain to the SUO:
  - a. Review of Adamsville's Sewer Use Ordinance (SUO) indicated that the definition for Significant Non-Compliance (SNC) was incomplete. The current definition lists SNC as consisting of "Chronic Violations" and "Technical Review Criteria Violations" but does not define these violations. The SUO should be revised to include complete definition of SNC as it appears in Tennessee Rule 0400-40-14-.08 (6)(b)(8)(i-viii). As a reminder, any revisions to Adamsville's SUO must be submitted to the Division for approval before being adopted by the City.
  - b. Adamsville's local limits are listed in Table 1 on page 71 of the SUO. Surcharges for compatible pollutants are included in the same table. The Division recommends removing the surcharge thresholds from Table 1 and listing them in their own separate table to avoid confusion between local limits and surcharge thresholds.
5. As part of the audit, oversight inspections were conducted at DPS and Masco. The following comments pertain to these inspections:
  - a. During the inspection of DPS, the sampling procedure was discussed. Currently a single grab sample is taken during the batch discharge of the clean water discharge tank at the end of the pretreatment system. DPS staff indicated that the clean water discharge tank is stirred prior to discharge. However, it is possible that the wastewater being discharged from the clean water discharge tank is not uniform which would cause the sample results to vary depending on at what point during the discharge the sample is taken. The Division recommends taking 3 grab samples, one during the beginning, middle, and end of the discharge and then combining the samples to form a composite sample of the batch discharge. This would serve to ensure that a representative sample is being obtained. Additionally, the Division recommends adding a standard operating procedure for the sample collection process into the DPS permit.
6. During the audit the IU permit and pretreatment files for DPS and Masco were examined, which resulted in the following comments:
  - a. Section 2.C. of the Masco permit lists the discharge limitations for the industry. The limits for Total Phenols are not consistent with Adamsville's approved local limits. Adamsville should ensure that the permit is revised to include the current local limits for all pollutant parameters. The Division recommends that Adamsville review all industrial user permits to ensure that they contain the current approved local limits.
  - b. Section K of the Masco permit contains boilerplate language and includes the required elements of a slug discharge control plan (SDCP). However, the permit does not explicitly

state that the industry is required to have a SDCP. If Adamsville requires Masco to maintain a SDCP, this requirement should be clearly indicated in the permit when it is reissued.

- c. The Reporting Requirements section of the DPS permit states that compliance reports are to be sent to Ms. Melisa Boner, JR Wauford. Ms. Boner has retired. The section should be updated to contain the appropriate contact information for submission of reports.
  - d. Section D.3. of both permits contains a narrative description of the sample location. The permits can be strengthened by adding a picture, a diagram, or both to avoid confusion when determining the correct sample location.
7. During the audit, handling of confidential information and requests by the public to review files was discussed. Mr. Pettigrew indicated that Adamsville does not currently have any confidential information on file and was unaware if a system was in place to handle public requests. Plans for handling confidential information and public requests to view files should be developed in case the need arises. The Division recommends communicating with City Hall to determine if a public records request protocol is in place.
  8. Adamsville's current NPDES Permit was issued on June 26, 2023, and became effective on September 1, 2023. As a reminder, section 3.2(a)(viii and ix) of the permit contains requirements for the submission of an updated Industrial Waste Survey and a written technical evaluation of the need to revise local limits within 120 days of the effective date of the new permit. Adamsville should contact the Division if they have any questions regarding these narrative conditions of the NPDES permit or need any additional information.

We appreciate the cooperation and hospitality shown during the inspection. Please provide by **October 13, 2023**, a written description of the actions that Adamsville will take to address these comments. If you have any questions, please do not hesitate to contact Adam Bonomo at (615) 417-3728 or [Adam.Bonomo@tn.gov](mailto:Adam.Bonomo@tn.gov).

Sincerely,



Jessica Murphy  
Manager  
Compliance and Enforcement Unit

EJM:AJBo

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