

October 11, 2019

Mr. Mr. Steve Waite, Owner
Bloomfield RE, LLC
501 Luther Foster Lane
Clinton, Tennessee 37716

RE: Sanitary Sewer System Inspection (SSS)
Wastewater Collection System
State Operating Permit SOP-92105
Anderson County

Dear Mr. Waite:

On Tuesday October 1, 2019, and Wednesday October 2, 2019 Hassan Sanaat and Woody Smith of the Tennessee Division of Water Resources conducted A Sanitary Sewer System (SSS) inspection on your wastewater collection system. Mr. Larry Clowers, Collection System Operator and Ms. Brandi Pack represented Bloomfield RE, LLC during this inspection. Following is a report of this inspection:

The Bloomfield RE, LLC State Operating Permit (SOP-02032) was issued on December 1, 2018. Its effective date is January 1, 2019, and expiration date is November 30, 2023.

The Bloomfield RE, LLC collection system collects residential wastewater from its mobile home park community and discharges to the Clinton STP for processing. It serves an area of one (1) square mile. There is roughly 1.20 miles of sewer line which is all pressurized. There are one hundred eighty plus (180+) residential connections. This collection system is not a combined sewer system. There is only one contract operator, namely, Mr. Larry Clowers, who is responsible for the operation of the collection system. Mr. Payes, Mr. Anthony Miller, and Mr. Bryan Amanns are responsible for maintenance of the collection system.

There has not been a need to have a Capacity, Maintenance, Operation Management (CMOM) program.

There are no satellite communities in the collection system. Overall, there are approximately fifty five (55) individual grinder units, zero inverted siphons, and zero manholes in the collection system. Pipe material for the collection system is all (100%) polyvinyl chloride (PVC). During the last three years there were approximately forty (40) dry weather E-1 grinder pump failures. There is no infiltration/inflow problems reported in the collection system because the collection system is pressurized.

A detailed paper version of the overall map of the collection system that includes pipe size, pipe material, and pipe length has been developed, but there is no GIS version. There is no chronic problem area for overflows in the collection system.

There have been no inspection activities such as CCTV, hydraulic jet cleaning, rod machines or hand machines for the past three years. Problem issues might include solids buildup. The collection system personnel were not aware of any illegal dumping.

About forty (40) complaints per year are received which are mostly about stoppages and E-1 (grinder pump) leaking. Complaints are typically resolved within the utility's goal of 24 hours or as soon as possible.

This is a mobile home park collection system and for this reason it does not have any Sewer Use Ordinance (USO) to include limitations on fats, oils, and grease (FOG), prohibitions against direct storm water discharges, and restrictions on other illegal discharges. There are also no written procedures for:

- Emergency response plans for response to SSO's
- SSO/Bypass containment procedures
- SSO problem evaluation / solution
- Procedure to clean up / mitigate of SSO effects
- Private-source I&I reduction program

Presently, there is no restriction on additional flow in any part of the collection system.

The budget for water and wastewater are separate. The revenue is greater than expenses of the operation and maintenance of the collection system. This is a self-supporting unit.

One of the E-1 grinder-pump stations was visited during the inspection.

Conclusion

Since a written overflow response plan (SORP) was not available, therefore, a sewer overflow response plan (SORP) form template, and other overflow related forms along with a customer complaint form that has been developed by Mr. Brett Ward of the University of Tennessee MTAS (Municipal Technical Advisory Service) have been

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emailed to Ms. Brandi Pack and Mr. Larry Clowers in order to develop a written Sewer Overflow Response Plan and other related forms. Mr. Brett Ward could be contacted at (865) 974-9853 for help on wastewater matters.

Finally, it is suggested that Bloomfield RE, LLC develop and implement a complete ***proactive, systematic and scheduled maintenance program*** for its wastewater collection system.

Thank you for your cooperation. Should you have any comments or questions, please do not hesitate to call me at (865) 594-5591 or e-mail me at Hassan.Sanaat@tn.gov.

Sincerely,

Hassan A. Sanaat
Division of Water Resources

e-copy: Enforcement and Compliance, DWR, Nashville
e-copy: Mr. Larry Clowers, larryclowers.acwa@gmail.com

