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August 29, 20022

Mr. Oscar Montenegro
Environmental Specialist
Division of Water Resources
Tennessee Department of Environment & Conservation
William R. Snodgrass TN Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243

RE: Draft of NPDES Permit No. TN0061841
Lewisburg Water and Wastewater Department
Cornersville, Marshall County, Tennessee

Dear Mr. Montenegro:

We have reviewed the subject permit on behalf of the Lewisburg Water and Wastewater Department and have the following comments:

1. Total Nitrogen and Total Phosphorous (00600 and 00665) were added to the permit requiring permit limitations for Monthly Average and Rolling Annual Average. The purpose of the rolling annual average requirements is to allow utilities to meet the permit limitations over a longer average period. Placing a monthly average limit that is 1/12 of the rolling annual average removes the benefit of having a rolling annual average permit limitation. As a result, we request that the monthly average limitations for these parameters be deleted and replaced with "Report".

Please do not hesitate to contact the undersigned if you believe a verbal conversation would be more beneficial. Thank you for your consideration.

Yours very truly,

J. R. WAUFORD & COMPANY,
CONSULTING ENGINEERS, INC.



J. Gregory Davenport, P.E.
President

JGD:lan

cc: Trigg Cathey, P.E., General Manager – Lewisburg Water and Wastewater
Caryl Giles, Lab Pretreatment Supervisor – Lewisburg Water and Wastewater

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