



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

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

April 15, 2022

Mr. Cliff Norville
Shelby County Public Works
160 North Main Street, Suite 1127
Memphis, TN 38103

SENT VIA ELECTRONIC MAIL TO: cliff.norville@shelbycountyttn.gov

Subject: NOTICE OF VIOLATION
SHELBY COUNTY GOVERNMENT D/B/A CHAPEL HILL S.D.STP
NPDES PERMIT TN0026361
SHELBY COUNTY, TENNESSEE

Dear Mr. Cliff Norville,

The Tennessee Division of Water Resources (The Division) has conducted a routine Compliance Status Review of the Discharge Monitoring Reports (DMRs) for Shelby County Government d/b/a Chapel Hill S.D. STP, (TN0026361). It has been noted that the facility failed to operate within permit effluent limits at Outfall 001 for BOD, carbonaceous [5 day, 20 C] and total suspended solids during the monitoring periods of November 2021 through February 2022, as detailed in the attached Violations Report.

The Division of Water Resources requests a written explanation for the violations summarized above within 30 days of receipt of this notice. The explanation should include the precise cause of the violations and the corrective action taken to avoid future violations. Documentation should be sent to the address listed above or you may email a copy to DWRWater.Compliance@tn.gov. If you believe the violations listed in the attached table have been identified incorrectly, please provide documentation to our office within fifteen (15) days of receiving this correspondence. Please be aware that failure to comply with your NPDES permit may subject you to enforcement action. Pursuant to T.C.A. §69-3-115, civil penalties may be assessed for each day a violation occurs or continues.

The Division appreciates your efforts to maintain water quality. If you have any comments or questions, please contact Cassi Savage at (615) 532-0154.

Sincerely,

Jessica Murphy
Manager, Compliance and Enforcement Unit

EJM:CLS

cc: Mr. Don Hudgins, Plant Administrator, City of Memphis Env. Division, donald.hudgins@memphistn.gov
 Mr. Chris Masin, Senior Engineer, Shelby County Government, chris.masin@shelbycountyttn.gov
 Mr. Eddy Bouzeid, Memphis Environmental Field Office, Eddy.Bouzeid@tn.gov
 Ms. Joellyn Brazile, Memphis Environmental Field Office, Joellyn.Brazile@tn.gov
 Ms. Maybelle Sparks, Nashville Central Office, Maybelle.Sparks@tn.gov
 Ms. Cassi Savage, DWR Compliance and Enforcement, Cassi.Savage@tn.gov
 Ms. Kathryn Schulte, Regional Director of External Affairs, Kathryn.D.Schulte@tn.gov
 DWR – Compliance File

Effluent Violations

Monitoring Period End Date	Limit Set	Parameter	Seas. ID	Value Type/ Stat. Base	Reported Value/Units	% Exceed.	Limit Value/Units
02/28/2022	001-G	80082 - BOD, carbonaceous [5 day, 20 C]	0	C1 MO AVG	22 mg/l	120%	<=10 mg/l
02/28/2022	001-G	80082 - BOD, carbonaceous [5 day, 20 C]	0	C3 DAILY MX	35 mg/l	75%	<=20 mg/l
01/31/2022	001-G	80082 - BOD, carbonaceous [5 day, 20 C]	0	C1 MO AVG	30 mg/l	200%	<=10 mg/l
01/31/2022	001-G	80082 - BOD, carbonaceous [5 day, 20 C]	0	C3 DAILY MX	36 mg/l	80%	<=20 mg/l
12/31/2021	001-G	80082 - BOD, carbonaceous [5 day, 20 C]	0	C1 MO AVG	16 mg/l	60%	<=10 mg/l
11/30/2021	001-G	00530 - Solids, total suspended	0	C3 DAILY MX	104 mg/l	131%	<=45 mg/l
11/30/2021	001-G	80082 - BOD, carbonaceous [5 day, 20 C]	0	C1 MO AVG	94 mg/l	840%	<=10 mg/l
11/30/2021	001-G	80082 - BOD, carbonaceous [5 day, 20 C]	0	C3 DAILY MX	151 mg/l	655%	<=20 mg/l