



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

July 30, 2014

Mr. Rusty Smith  
Pretreatment Coordinator  
Town of Decatur  
PO Box 188  
Decatur, TN 37322

Re: Pretreatment Audit  
Decatur Pretreatment Program  
NPDES # TN0058521  
Meigs County

Dear Mr. Smith:

We appreciate your time on June 19, 2014, when Jennifer Dodd, Jessica Rader and Nikki Carpenter conducted a Pretreatment Audit of the Decatur industrial pretreatment program. The review of Decatur's program produced the following comments:

1. The sampling frequency outlined in the pretreatment program and industrial user permits is complex. We recommend that the Town review the sampling portion of the pretreatment program to determine if it adequately meets the needs of the pretreatment program. Please notify Ariél Wessel-Fuss if the Town would like to modify the pretreatment program.
2. During the audit, a copy of the local limits and protection criteria calculations were not located. These calculations are critical program materials for implementation of the Town's pretreatment program. As such, a copy must be readily accessible by the Town's personnel. Decatur should take appropriate action to ensure that the local limits and protection criteria calculations are available to the city's personnel.
3. Please ensure that industrial users are certifying reports in accordance with Tennessee Rule 0400-40-14-.12(12). The certification statement can be found in Tennessee Rule 0400-40-14-.06(1)(b)2. The certification statement should contain an original wet-ink signature.
4. Thus far, you have done an excellent job of familiarizing yourself with the Town's industries and pretreatment program. We believe additional training would greatly benefit you and the Town of Decatur. The EPA has a Pretreatment 101 series that is available online at <http://cfpub.epa.gov/npdes/pretreatment/pretreattraining.cfm>.

Also, the State offers training classes periodically through the Fleming Training Center (<http://www.tn.gov/environment/fleming/>). The pretreatment training is typically listed under continuing education seminars.

5. On July 30, 2013, the proposed E-Reporting Rule was published by EPA. After the rule is finalized and implemented, it will require electronic submittal of reports such as the pretreatment semi-annual report and the discharge monitoring report as well as many others. This will require some municipal employees to have internet access. We recommend that the Town review its current resources (both personnel and technology) and plan accordingly. For reference, the federal register notice for this rule can be found at <http://www2.epa.gov/compliance/proposed-npdes-electronic-reporting-rule>. A link to the federal register notice is located on this page.

The following comments relate to the industrial user permits:

1. Table 2 of Cymer's permit contains the categorical limits. Please include the sample type in this table.
2. The industrial user permit contains basic verbiage as to the sample location. We recommend adding a more detailed description or diagram of the sampling location to the permit in order to prevent confusion as to the sample location.
3. Cymer is classified as a new source categorical industrial user under 40 CFR Part 414, Subpart H. However, due to the way this particular categorical rule is written, the pretreatment requirements are located in Subpart K. Please update the classification under Table 2 to clearly state that Cymer is regulated under 40 CFR Part 414, Subpart K - New Source.
4. The Sewer Use Ordinance (SUO) has been recently updated with streamlining changes. Please review the industrial user permits in order to incorporate changes made to the SUO. In particular, please review the prohibited pollutants section and Section 9 - penalties.
5. It is our understanding that the Town has determined that a slug control plan is necessary for Shaw, therefore Shaw's permit should clearly state that the Town requires that a slug control plan be submitted per Tennessee Rule 0400-40-14-.08(6)(a)3(iii)(VI). For reference, this requirement is located in Cymer's permit under the special conditions section.
6. The table titled Limitations on Wastewater Strength lists the pollutants that are subject to a surcharge as well as limits. The combined surcharge and limits table has been problematic for other cities. We strongly recommend that the surcharge limits be placed in a separate table and clearly identified as surcharge thresholds or amounts not subject to enforcement.
7. Please include statements to require industrial users to notify the city in the case of upsets per Tennessee Rule 0400-40-14-.16.
6. The EPA has published an updated industrial user permitting manual. It can be located on EPA's website at:  
  
[http://cfpub.epa.gov/npdes/docs.cfm?document\\_type\\_id=1&view=Policy%20and%20Guidance%20Documents&program\\_id=3&sort=name](http://cfpub.epa.gov/npdes/docs.cfm?document_type_id=1&view=Policy%20and%20Guidance%20Documents&program_id=3&sort=name)
7. We recommend generating a rationale sheet to be included in the permit file for the industry that outlines the reasoning for decisions made regarding that industry.

We appreciate the effort you have put into the Town's pretreatment program. Please provide to this office a written description of the actions Decatur will take to address comments by September 1, 2014. If you have any questions concerning this correspondence or if we may be of any further assistance to you in any way, please feel free to contact me at (615) 532-0642 or at [ariel.wessel-fuss@tn.gov](mailto:ariel.wessel-fuss@tn.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Ariel Wessel-Fuss".

Ariel Wessel-Fuss, Environmental Protection Specialist  
Compliance and Enforcement Unit

e-copy: [Angela.Young@tn.gov](mailto:Angela.Young@tn.gov) - Ms. Angela Young – Chattanooga EFO  
[Laurasmith@decaturtn.net](mailto:Laurasmith@decaturtn.net) - Ms. Laura Smith – Town of Decatur