



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

Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, TN 38133

Phone 901-371-3000 Statewide 1-888-891-8332 Fax 901-371-3170

March 6, 2020

Billy Arnold
73 Jane Drive
Munford, TN 38058

CERTIFIED MAIL # 91 7108 2133 3932 1432 4028
RETURN RECEIPT REQUESTED

Re: Notice of Violation - Compliance Evaluation Inspection
 Pine Grove Mobile Home Park
 State Operating Permit Tracking Number: SOP-11012
 Munford, Tipton County, Tennessee

Dear Mr. Arnold:

On February 25, 2020, personnel from the Division of Water Resources conducted a Compliance Evaluation Inspection (CEI) of the wastewater treatment system that serves the Pine Grove Mobile Home Park. The purpose of the inspection was to determine compliance with the *State Operating Permit*. Your assistance and knowledge about the system was greatly appreciated and enabled the inspection to be conducted in an efficient manner. A copy of the CEI report and associated photo document is enclosed for your reference. The following items are deficiencies that were observed during the inspection:

- A written plan describing how rainfall and other surface runoff reaching the pond will be disposed of without discharge has not been developed. Part I of the permit requires that this plan be developed and retained on-site.
- The treatment system is not being inspected by a certified operator. Part I of the permit requires the site be inspected by a certified operator or their designee at least once every 14 days.
- The waste treatment facility is not being operated under the supervision of a certified wastewater operator and the collection system is not supervised by a grade I certified collection system operator. Part III, Section A of the permit requires the wastewater treatment facility be operated under the supervision of a Biological Natural System certified wastewater treatment operator and the collection system be operated under the supervision of a grade I certified collection system operator.

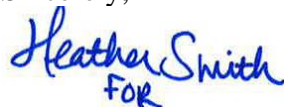
- The appropriate signs were not posted at regular intervals (at least every 150 ft.) around the perimeter of the wastewater treatment lagoon or at the entrance. See Part III, Section B of the permit for additional information.
- An area of erosion on the northern portion of the bank of the wastewater treatment lagoon was observed during the inspection.
- It should be noted that these are the same deficiencies that were observed during the previous inspection conducted in August 2015.

Required Actions:

- Develop a written plan describing how rainfall and other surface runoff reaching the pond will be disposed of without discharge.
- Commence operating the wastewater treatment facility under the supervision of Biological Natural System certified wastewater treatment operator and the collection system under the supervision of a grade I certified collection system operator. Begin inspections of the treatment system by a certified operator or their designee at least once every 14 days. If you believe having a certified operator and/or collection system operator will not benefit the wastewater treatment facility, then contact your permit writer and apply for a permit modification. Your permit writer is Wade Murphy and can be contacted by email at Wade.Murphy@tn.gov or by phone at (615) 532-0666.
- Place the appropriate signs at regular intervals (at least every 150 ft.) around the perimeter of the lagoon as required by the permit. See Part III, Section B of the permit for additional information and required language.
- On or before March 30, 2020, submit a written response and photos indicating how the items mentioned above will be or have been resolved.

The Division appreciates your time and assistance and the efforts that have been taken to ensure compliance with the permit. If there are factors regarding this matter that need further discussion, please contact Steve Owens at (901) 371-3029 or Steve.R.Owens@tn.gov or Mrs. Joellyn Brazile at (901) 371-3025 or Joellyn.Brazile@tn.gov.

Sincerely,



Heather Smith
FOR

Joellyn Brazile
Environmental Program Manager
Division of Water Resources
Memphis Field Office

Enclosures: Compliance Evaluation Inspection Report and Photo Document

cc: TDEC/DWR/MEFO - file

ec: TDEC/DWR/NCO - Enforcement and Compliance Section

Wade Murphy; TDEC-DWR, Wade.Murphy@tn.gov

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Water Resources

Memphis Environmental Field Office, 8383 Wolf Lake Drive, Bartlett, TN 38133

1-888-891-8332 (TDEC)

Compliance Inspection for State Operating Permits

Facility Name: Pine Grove Mobile Home Park	Tracking Number: SOP-11012
Permit Effective Date: September 1, 2016	Permit Expiration Date: August 31, 2021
Date of Inspection: February 25, 2020 Time of Inspection: 12:30 p.m.	Inspector(s) Name: Steve Owens

Official Contact Person Name: Billy Arnold, Partner & Kriston Arnold, Partner	
Address: 73 Jane Drive Munford, TN 38058	Phone Number: (901) 837-0012 Email:

Summary of Findings and Comments:

I. Permit

On Tuesday, February 25, 2020, Steve Owens with the Division of Water Resources conducted a Compliance Evaluation Inspection (CEI) at the Pine Grove Mobile Home Park wastewater treatment facility (Photo 1) located in Munford, Tennessee. The facility is designed to serve approximately 60 residences located in the Pine Grove Mobile Home Park. Mr. Arnold and Mr. Owens inspected the wastewater treatment lagoon. Afterwards, Mr. Owens met with Mr. Billy Arnold, Partner and Mrs. Kriston Arnold, Partner, and discussed the self-monitoring program. The following is a summary of the findings and observations.

The State Operating Permit (SOP) for the Pine Grove Mobile Home Park wastewater treatment system with tracking number SOP-11012 expires on August 31, 2021. Mr. Arnold should reapply for permit coverage at least 180 days prior the expiration date of August 31, 2021. The permit allows the operation of a wastewater treatment lagoon with a design capacity of 0.01 MGD (10,000 GPD). The operation of the lagoon should be such that there is no wastewater discharge to a surface stream and no contamination of any subsurface waters. Since this treatment system does not discharge there are no effluent sampling requirements.

II. Records/Reports

The written plan required by the State Operating Permit have not been developed. Recognizing that rainfall exceeds evaporation in Tennessee, the permittee shall prepare and implement a written plan describing how rainfall and other surface runoff reaching the pond will be disposed of without discharge. This plan shall be retained on-site and made available for review upon request by the Division.

III. Facility Site Review

The Pine Grove Mobile Home Park wastewater treatment system consists of a single cell lagoon with no discharge. There was an estimated 10-15 ft. of freeboard at the time of the inspection and no discharge was observed. The lagoon does not have a discharge pipe connected to it. Both aerators were inoperable during the inspection (Photos 2 and 3), Mr. Arnold stated that the aerators would be replaced as soon as the ground leading into the lagoon was firm enough to support vehicular traffic. It should be noted that since the lagoon does not discharge there are no effluent limits specified in the permit and the aerators are primarily used to control odor and vegetation grown in the water. Mr. Arnold also stated that if the park was filled to maximum capacity there would be 64 mobile homes and 7 apartments utilized in the wastewater lagoon.

A chain link fence over 4 ft. high encompasses the wastewater lagoon. Mr. Arnold has replaced the section of fencing that was observed during the previous inspection as being less than 4 ft. high (Photo 4). There is a berm that surrounds the top of the lagoon which prevents rainwater from entering (Photo 5).

There is also a secured gate at the entrance of the lagoon to prevent or impede unauthorized entry. The gate and fence that surrounds the lagoon lacks the appropriate signage as required by the permit (Photos 6 and 7). The information shown below should be placed at the entrance and on signs posted at regular intervals (maximum 150 ft. intervals) around the perimeter of the wastewater treatment lagoon. The minimum sign size should be two feet by two feet (2 ft. x 2 ft.) with letters not less than two inches (2 in.) high. Each sign shall be made of durable material and have a white background with black letters, see Part III, B. Placement of Signs (pg. 12), of the permit for additional information.

<p style="text-align: center;">TREATED DOMESTIC WASTEWATER LAGOON PINE GROVE MOBILE HOME PARK (901) 837-0012 TENNESSEE DIVISION OF WATER RESOURCES Memphis Environmental Field Office PHONE NUMBER: 1-888-891-8332</p>

An area of erosion on the northern portion of the bank of the wastewater treatment lagoon was observed during the inspection (Photo 8). Mr. Arnold was also made aware that the eroded area would need to be repaired during the inspection.

IV. Effluent/Receiving Waters

The Pine Grove Mobile Home Park wastewater treatment lagoon does not discharge wastewater to any surface waters.

V. Self-Monitoring Program

Currently, there is no Biological Natural System certified wastewater treatment operator supervising or inspecting the lagoon or a grade I certified collection system operator supervising the collection system as required by the permit. Mr. Arnold stated that there are no mechanical devices or manholes associated with the wastewater lagoon collection system.

VI. Compliance Schedule

The Pine Grove Mobile Home Park wastewater treatment facility was not under a Compliance Schedule for the period of August 2015 through February 2020.

VII. Operation & Maintenance

No preventative maintenance schedule has been developed for the treatment system. Mr. Arnold stated that all maintenance needs are performed as they arise.

VIII. Sludge Handling

Due to the large freeboard, sludge and other materials are not removed from the wastewater treatment lagoon.

Photo Document

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Photo 1. Aerial photo of the Pine Grove Mobile Home Park and wastewater treatment lagoon. The approximate property line is shown with an orange line.

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Photo 2. View of the southern portion of the wastewater treatment lagoon. The aerator serving the southern portion of the lagoon was inoperable during the inspection.

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Photo 3. View of the northern portion of the wastewater treatment lagoon. The aerator serving the northern portion of the lagoon was inoperable during the inspection.

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Photo 4. The portion of fencing that was less than 4 ft. high observed during the previous inspection had been replaced with appropriate fencing.

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Photo 5. There is a berm that surrounds the top of the lagoon which prevents rainwater from entering.

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Photo 6. Secured gate and "No Trespassing" sign at the entrance of the wastewater treatment lagoon. The appropriate sign was not posted at the entrance of the wastewater treatment lagoon.

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Photo 7. Representative example of the chain link fence surrounding the perimeter of the wastewater treatment lagoon. The appropriate signs were not posted at regular intervals (at least every 150 ft.) around the perimeter of the wastewater treatment lagoon.

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Photo 8. View of an eroded area on the northern portion of the wastewater treatment lagoon.