



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

Davy Crockett Tower
500 James Robertson Parkway, 9th Floor
Nashville, Tennessee 37243-1102

May 30, 2024

Mr. Alex Smith
General Manager
Humboldt Utilities
P.O. Box 850
Humboldt, TN 38343

SENT VIA ELECTRONIC MAIL TO: asmith@humboldtutilities.com

Re: Pretreatment Audit Inspection
Humboldt Pretreatment Program
NPDES Permit No. TN0062588
Gibson County

Dear Mr. Smith,

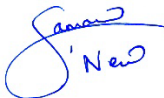
The Division of Water Resources (Division) appreciates your staff's time on May 14, 2024, when Mr. Gordon Holcomb, and I met with Mr. Tyler Landrum, Mr. Brett Waldrup and Ms. Jane Leatherland to conduct a Pretreatment Audit Inspection of the Humboldt Utilities' industrial pretreatment program. The comments below are based on the results of the pretreatment audit.

1. During the audit the change in authority and name from Humboldt Public Board of Utilities to Humboldt Utilities Authority was discussed. Humboldt has completed the necessary updates to their Sewer Use Regulation to reflect the changes. However, please note the Industrial Permits need revising to reflect the change once it is finalized.
2. As part of the audit, file reviews and site visits were conducted for Bongards Creameries and WestRock. The following comments pertain to the file review and site visits:
 - a. Part 3(B) of both permits require industries to include a signed certification statement with each monitoring report. However, the permits do not specify who may sign these certification statements. The signatory requirements from Tennessee Rule 0400-40-14-.12(12) should be added to the permits.
 - b. Part 1(B) of each permit contains effluent limitations. The permitted pH range is listed under the column for daily average maximum concentrations. Humboldt should revise the permits to clarify that the lower and upper pH limits are an instantaneous minimum and instantaneous maximum, respectively.

- c. Part 3(I) of the permits states that “violations of this permit may result in penalties of up to \$10,000 per violation as outlined in Section 10 of the sewer use ordinance.” This section of the permits could be strengthened by specifying that violations may result in penalties up to \$10,000 per violation *per day* in accordance with Humboldt’s ordinance.
 - d. During the site visit at WestRock, there were chemicals stored in close proximity to floor drains without secondary containment. The Division highly recommends all chemicals in close proximity to floor drains be placed on secondary containment.
 - e. During the site visit at Bongards, Division staff noted the presence of bulk storage of quaternary ammonia compounds in the sanitation room. The tote was stored on secondary containment as recommended, but the Division recommends additional precautions be taken to prevent plant upset. Additionally, Humboldt should ensure Bongards updates their slug discharge control plan to reflect additional notification requirements should a spill of quaternary ammonia occur.
3. As part of the file review, inspection reports were examined. There was some confusion regarding the location of one set of inspection reports. Due to this, the Division recommends Humboldt reevaluate the current data management system to determine its effectiveness.
 4. The Division would like to highlight Humboldt and Bongards efforts over the past 2 years to establish an effective working relationship with regards to compliance. Bongards has hired new staff which in conjunction with Humboldt staff have worked tirelessly to correct all noncompliance and develop standard operating procedures to minimize the chance of noncompliance in the future.
 5. The Division recognizes that Mr. Landrum and Mr. Waldrup are relatively new to pretreatment. While Ms. Leatherland has done an excellent job in training them, the Division recommends that Humboldt continues to invest in training for employees as Ms. Leatherland works towards retirement.

We appreciate the cooperation and hospitality shown during the inspection. Please provide to this office, by **July 8, 2024**, a written description of the actions Humboldt will take to address these comments. If you have any questions, please do not hesitate to contact me at (615) 961-4440 or Samantha.Oneil@tn.gov.

Sincerely,



Samantha O'Neil
State Pretreatment Coordinator
Division of Water Resources

e-copy: Mr. Gordon Holcomb – TDEC Central Office
Ms. John Bowling – TDEC Johnson City EFO
Mr. Tyler Landrum – Humboldt Utilities
Ms. Jane Leatherland – Humboldt Utilities
Mr. Brett Waldrup – Humboldt Utilities