

July 29, 2018

Mr. Brad Ulmer
Division of Water Resources
711 R.S. Gass Blvd.
Nashville, TN 37216



627 Bill Rice Ranch Road
Murfreesboro, TN 37128

Re: **Compliance Evaluation Inspection**
Bill Rice Ranch, Inc.
NPDES TN0057975, Rutherford County

AUG - 6 2021

Dear Mr. Ulmer,

Thank you for your report. We appreciate TDEC's expertise and guidance. 100% compliance with our NPDES permit is our goal and we committed to continuing to improve.

As a result of conversations with TDEC staff during the inspection, the following improvements have been made:

Item No.	Conversation	Comment
1	Check the Alconox: it must be phosphate free. If needed, switch to "the one with blue label."	Alconox has been replaced with Liquinox.
2	Record dates when chemical solution bottles are opened.	We are now doing this.
3	Replace CL2 gel standards every two years.	We'll start doing this.
4	Document QA QC	We are doing this, but have improved records and consistency.
5	ID who collects samples on Bench Sheet.	Bench Sheet has been revised.
6	Email Oakley (cc: Jenny) several MicroBac reports	Done: 6-9-21
7	Reduce size of storage container for disposal of Headworks screenings.	Done: 6-7-21
8	<i>"The permittee shall sign up for electronic reporting of Discharge Monitoring Reports using NetDMR within 90 days of the permit effective date. See Section 1.3.1. of the permit for more information."</i>	In progress: currently awaiting TDEC authentication of signatory's identity.

Required Actions

1. "Review the sampling and chain of custody documents for all tests being performed and outsourced by the sewer treatment facility." Pursuant to the required language of the NPDES permit pg. 5 section 1.2.4:
 - a. Ranch staff "shall record the following information: a) The date, exact place, and time of sampling or measurements; b) The individual(s) who performed the sampling or measurements;"
 - b. MicroBac staff shall record the following information: "c) The date analyses were performed; d) The individual(s) who performed the analyses; e) The laboratory where the analyses were performed; f) The analytical techniques or methods used; and g) The results of such analyses.
2. "Please contact an environmental engineer to assess the facility. Determine the needs of the patrons as that relates to the loading of the facility. Consider the needs of the recently issued NPDES permit. Consider and discuss the construction of a new treatment facility."
 - a. We agree with your observation that future plans for facility updates need to be considered and proceed with this course of action.

Thank you for your efforts. We appreciate TDEC staff's knowledge and professionalism.

Sincerely,



Wil Rice IV

President, Bill Rice Ranch

ec:

Brad Ulmer, DWR

Jessica Murphy, DWR

Nathan Lipskoch, BRR

John Strickland, Hydrenzo