

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

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

September 15, 2021

Mrs. Viola Lenzi

Owner

e-copy: mallardridge@gmail.com
Mallard Ridge Mobile Estates
PO Box 1336
Munford, TN 38058

Subject: **NPDES Permit No. TN0065277** 

**Notice of Incomplete Application** 

Viola L. Lenzi

**Drummonds, Tipton County, Tennessee** 

Dear Mrs. Lenzi:

The Division of Water Resources (the division) has received your application for the above referenced project on September 10, 2021. We appreciate your prompt response to our previous letter. We have reviewed the application for completeness in accordance with TDEC rule 0400-40-5-.05 (2) and find the application to still be incomplete.

As we said in the previous letter, every lagoon in Tennessee overflows after a while, as the precipitation always exceeds evapotranspiration in our state. That is the fact even if there was no additional influent, such as sanitary wastewater to be treated (which is the case with your lagoon system). We do not argue with your claim of no discharges from the lagoon during the current and previous permit cycles. However, the only feasible explanation for "no discharge" condition would be that your wastewater treatment system is leaking, i.e., discharging partially treated effluent to groundwater.

Either from the point of having a reasonable potential to discharge effluent into surface waters, or from effluent being discharged to groundwater, you should characterize pond/effluent quality. As instructed in page 2E-3 of EPA Form 2E, providing a minimum of one set of sampling data is required for the application to be deemed complete. Given a claimed condition of "no discharge," effluent collection should take place in the lagoon, near the point of potential discharge (outfall).

The processing of this application has been suspended until the following information has been submitted:

• Missing effluent data, EPA Form 2E Section 4.2

A complete application should be submitted at the address above within 30 days of the date of this letter. You should be aware that in accordance with TDEC Rule 0400-40-5-.05 (2), your receipt of this notice does not preclude the division from later requesting additional material that subsequent to the notice of completeness is determined to be necessary for permit processing.

If you have questions, please contact the Memphis Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Courtland Vice at (615) 532-0625 or by E-mail at Courtland.Vice@tn.gov.

Sincerely,

Vojin Janjić

Manager, Water-Based Systems

cc: Permit File

Memphis Environmental Field Office (Eddy.Bouzeid@tn.gov)

Mr. Britton Dotson, GWP Environmental Fellow (Britton.Dotson@tn.gov)

Mr. Chris Lenzi, Owner/Manager, Mallard Ridge Mobile Estates, mallardridge@gmail.com