TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Water Resources
JACKSON ENVIRONMENTAL FIELD OFFICE
1625 Hollywood Drive
JACKSON, TENNESSEE 38305
PHONE (731) 512-1300 STATEWIDE 1-888-891-8332 FAX (731) 661-6283

June 15, 2022

Honorable Roger Pafford
Mayor of City of Camden
e-copy: mayorpafford@bellsouth.net
P. O. Box 779
Camden, TN 38320

RE: **Compliance Evaluation Inspection**
City of Camden Wastewater Treatment Facility
NPDES TN0064611
Camden, Benton County

Dear Mayor Pafford:

On May 26, 2022, as a representative of the Tennessee Department of Environment and Conservation, the Division of Water Resources, Jackson Environmental Field Office, I conducted a Compliance Evaluation Inspection (CEI) of the City of Camden Wastewater treatment facility. During the inspection, the wastewater treatment plant was evaluated to determine the status of compliance with your National Pollutant Discharge Elimination System (NPDES) permit. The Division thanks operator David Tuck for his time and assistance.

I. Permit

The permit covers the discharge of treated municipal wastewater from Outfall 001 to Cypress Creek at mile 12.8. A separate State Operating Permit (SOP-15022) authorizes spray irrigation to a land disposal site consisting of 500 acres. The discharge/sprayfield effluent consists of treated municipal wastewater from the Town of Camden's wastewater collection and treatment system. The treatment plant has a design capacity of 0.5 MGD. An electronic copy of the permit was on file and available for review.

II. Records/Reports

A review of the facility's self-monitoring and collection system records was performed. All required reports were accurately transcribed and submitted in a timely manner.

III. Facility Site Review, Self-Compliance Program, Operation & Maintenance, and Sanitary Sewer Overflows

The collections system consists of 12 pump stations with SCADA call out capabilities. Wastewater enters the treatment facility through an influent pump station consisting of grinder pumps and large particulate removal. The Camden wastewater treatment consists of three lagoons. The first lagoon contains a baffle curtain and 5 aerators. The second and third lagoons have 2 aerators each. Treated water leaves the treatment lagoon, enters the chlorine contact chamber and is either discharged to Cypress Creek through the effluent pump station or land applied through a 500 acre sprayfield as permitted by SOP-15022.

The Camden Wastewater treatment has reported the following effluent violations since the last CEI on 12/28/2018:

- *E. coli*, MTEC-MF = 1 effluent violation
- Carbonaceous biochemical oxygen demand (CBOD) = 1 effluent violation
- Oxygen, dissolved (DO) = 1 effluent violation
- pH = 3 effluent violations

The certified operator in direct charge holds BNS and CS1 certifications. Emergency power is available and exercised monthly.

IV. Effluent/Receiving Waters

The outfall location at the receiving stream (Cypress Creek at mile 12.8) was observed during this inspection and was found to have a cleared area complete with signage for the outfall.

V. Flow Measurement

Influent and effluent flow are measured by magnetic meters that have been installed for a few years and will need to be inspected and have their calibration verified annually.

VI. Laboratory

Laboratory standard operating procedures are followed consistently by laboratory staff. All analytical methods employed in the laboratory are approved in Title 40 CFR Part 136. In-house testing includes the following parameters: pH, dissolved oxygen, total residual chlorine, carbonaceous biochemical oxygen demand (CBOD), *E. coli*, total suspended solids, NH3 as N and settleable solids. Nitrogen total as N, Phosphorus total as P, Phenols and whole effluent toxicity are being subcontracted to Waypoint Analytical in Jackson for analysis. The subcontract laboratory was not evaluated as part of this inspection. Overall, laboratory quality assurance and quality control practices are performed according to their methods for all the in-house testing required by the permit. A few areas that need to be brought into compliance in the laboratory were identified:

1. Method Detection Limit (MDL) was not being generated for Total Residual Chlorine (TRC). The TRC MDL should be performed on a known standard to meet 40 CFR Part 136 requirements.
2. MDL on Total Suspended Solid method blank not being generated according to 40 CFR Part 136 requirements.
3. A duplicate sample needs to be run for settleable solids as per 40 CFR Part 136 requirements.

VII. Sludge Handling/Disposal (or Biosolids Handling/Disposal)

No sludge has been removed from the lagoon since last CEI inspection. Sludge has been measured and found to be minimal.

VIII. Additional Comments and Recommendations

The City of Camden wastewater facility is extremely well maintained with redundancy for all parts of the treatment lagoons and collection system. Staff are to be commended for their effort to keep the facility running in such an exemplary manner.

The Division recommends the Camden wastewater facility have the Tennessee Association of Utility Divisions for a site visit and to assist with getting the QA/QC measures in alignment with Title 40 CFR Part 136 requirements.

IX. Conclusion

Compliance with your NPDES requirements ensure discharges that are protective of downstream fish and aquatic life and water quality. On behalf of the Division, I want to thank you and your staff for your efforts to ensure permit compliance and to protect state water quality. If I may be of assistance in matters concerning this report, please contact me via telephone at (731) 458-7080 or via email at Tammy.Miller@tn.gov.

Sincerely,

Tammy Miller, Environmental Scientist
Jackson Environmental Field Office
Division of Water Resources

Copy: Mr. David Tuck, cityofcamden2@bellsouth.net
Conner Franklin, DWR Program Manager, JEFO (via email)
JEFO file