

**From:** "LARRY CLOWERS" <larryclowers.acwa@gmail.com>  
**Sent:** 21/06/2024 15:48:30  
**To:** "DWRWater Compliance" <DWRWater.Compliance@tn.gov>  
**Cc:**  
**Subject:** [EXTERNAL] Re: TN0074071 – Anderson County Water Authority Airbase STP Notice of Violation

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Ms. Elias,

First, let me apologize for letting the violations get to this point. I have not seen a DMR on the WWTP since Mr. Sharp began submitting the report electronically. He did not communicate with me that the problems were still occurring and that we were still having test results that failed to meet our permits limits. I somehow missed the November 23 violation notice and it was not brought to my attention. Mr. Sharp has operated the WWTP as well as our collection system for many years and I trusted him to make me aware of any problems/violations that occurred. Mr. Sharp has now been relieved of his duties at the WWTP and Teddy Brown will be the licensed operator of the plant moving forward. I do however take full responsibility for not asking to see the reports that were filed electronically or taking more of an active roll regarding the plant. As general manager I did not have the time to do so, which was a factor in hiring Mr. Brown from a neighboring system. I assure you that ACWA takes any type of violation very seriously and responds immediately to correct the problem.

Upon arriving back from vacation and learning about the latest violation notice I have taken an active role in solving the many issues Mr. Brown and I discovered when we visited the plant with an industry specialist. Below is a list of our findings as well as our actions (shown in bold) that have been taken or are scheduled to be completed within the next month.

1. The UV light lens was very dirty. **The lens has been cleaned and will be cleaned at regular intervals.**
2. There were 6-7 feet of solids in the holding tank. **On 6/20, 31,000 gallons of mostly solids were pumped out and hauled to off site.**
3. 3 of the recirculation pumps were missing. **After further investigation we discovered the pumps have not been in the recirculation tank for over 2 years. Pumps are ordered.**
4. There was a significant amount of solids in the recirculation tank. **Tank was also cleaned out on 6/20.**
5. The liner and framing was deteriorated (we already had this scheduled for replacement by the end of 2024). **Work has begun to replace the framing and lining that is exposed.**
6. The steps to the outfall needed replacing (this was also scheduled to be completed by tears end). **The steps will be reconstructed after the liner repairs.**

As you can see we are making every effort to get the plant running the way it was intended to operate. Any other equipment that we find inoperable after installing the new recirculation pumps will be replaced as soon as possible. I will provide updates as we move toward compliance.

Please feel free to contact me at (865)457-3033 with any questions or concerns.

Sincerely,

Larry Clowers  
General Manager ACWA

On Fri, May 24, 2024 at 2:41 PM DWRWater Compliance <[DWRWater.Compliance@tn.gov](mailto:DWRWater.Compliance@tn.gov)> wrote:

Dear Mr. Sharp:

The Tennessee Division of Water Resources (The Division) has conducted a routine Compliance Status Review of the Discharge Monitoring Reports (DMRs) for the Anderson County Water Authority's Airbase STP, NPDES permit TN0074071. It has been noted that the facility failed to operate within permit effluent limits at Outfall 001 for *E. coli*, CBOD, and nitrogen, ammonia total [as N] between the monthly monitoring periods of November 2023 to March 2024, as detailed in the attached Violations Report.

Correspondence is being sent via electronic mail only. There will not be a hard copy mailed. If you need a hard copy, please let us know and we will do our best to accommodate you.

The Division appreciates your efforts to maintain water quality. If you have any comments or questions, please contact Sarah Elias at (615) 961-0486.

Sincerely,

Sarah Elias, NPDES Compliance Manager

Compliance & Enforcement Unit