



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

January 23, 2009

Vojin M. Janjic
Manager, Permit Section
Division of Water Pollution Control
Tennessee Department of Environment and Conservation
L & C Annex - 6th Floor
401 Church Street
Nashville, Tennessee 37243-1534

SUBJECT: NPDES Overview of Cleveland Utilities
Sewage Treatment Plant (STP)
NPDES Number TN0024121

Dear Mr. Janjic:

In accordance with the Environmental Protection Agency (EPA)/Tennessee Department of Environment and Conservation (TDEC) Memorandum of Agreement, we have completed our review of the draft National Pollutant Discharge Elimination System (NPDES) permit referenced above and received on December 24, 2008. Based on our review, it has been identified that this facility discharges into the Hiwassee River, which EPA had determined ultimately discharges into the Mississippi Water Basin. The current permit that expires this month does not have monitoring for nutrients.

In the past, EPA has requested that facilities which may contribute nutrients that ultimately goes to the Mississippi Water Basin have at least monitoring for total nitrogen and total phosphorus included in their NPDES permit. As previously indicated to you, this is a performance measure for EPA Region 4 and its states, which is essentially the same as last year's performance measure and supports the "Gulf Hypoxia Action Plan 2008." This Action Plan may also be found on EPA's website for the Mississippi River Gulf of Hypoxia Watershed Nutrient Task Force at: <http://www.epa.gov/msbasin/>. As you may recall, Jim Giattina's goal is to have 100% of the majors with limits or monitoring requirements in the Mississippi River Basin. In addition, EPA has informally requested this monitoring be on a monthly basis for the life of a permit.

Based on the fact that the Environmental Protection Agency (EPA) is continuing its effort to focus attention on the Gulf of Mexico hypoxia issue during 2009, I am recommending that the reissued contain monthly monitoring requirements for both total nitrogen and total phosphorus. We do not expect the additional expense of this monitoring to be significant. Based on a preliminary examination of the costs of additional analysis to complete nutrient monitoring and reporting in permits, the average cost per sample is \$30-40, with some additional costs possible when performing the analyses off site. If you have any questions regarding this matter please feel free to contact me at (404) 562-9390 or Connie Kagey at (404) 562-9300.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark J. Nuhfer', written over a large, light-colored circular scribble or stamp.

Mark J. Nuhfer
Chief
Municipal and Industrial NPDES Section
Pollution Control and Implementation Branch
Water Protection Division

cc: Mr. Craig Mullinax, Water Division Manager,