



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

Nashville Environmental Field Office
711 R.S. Gass Blvd.

Nashville, Tennessee 37216

Phone 615-687-7000 Statewide 1-888-891-8332 Fax 615-687-7078

October 28, 2022

Honorable J. T. Smith, Mayor
eCopy to: jtsmith@ashlandcitytn.gov
Town of Ashland City
P. O. Box 36
Ashland City, TN 37015

RE: **Sanitary Survey- Community Water System, and Notice of Violation**
 Ashland City Water Department
 PWSID #0000023
 Cheatham County

Dear Mr. Smith:

This letter serves as a notice of violation for construction without plans and failure to address deficiencies noted in the most recent sanitary survey in a timely manner, including a significant deficiency noted that could cause contamination of distribution system water. The details of the violations are listed below.

On Tuesday October 18, 2022, Thomas Killion from the Division of Water Resources (Division) performed a site visit of the Ashland City Water Department (ACWD) to follow up on items mentioned in the most recent sanitary survey letter. During the visit it was learned that the standpipe that fills the Caldwell Storage Tank was replaced with a larger pipe. Replacing the standpipe in this tank, particularly since it was replaced with a size different that it was engineered to use would require plans and specifications to be approved before starting construction. This was not done.

Failure to submit plans and specifications to the Division for approval prior to work being started is a violation of Tennessee Code Annotated 68-221-706 which states, in pertinent part "No new construction shall be done nor shall any changes be made in any public water system until plans for such new construction or change have been submitted and approved by the department."

Division staff also noted that the holes noted in the roof of the Industrial Tank during the sanitary survey had not yet been fixed. In a letter sent to the Division in response to the sanitary survey Ashland City Water Department (ACWD) indicated that it would contract with a third party to repair the holes. However, during the follow up, ACWD staff indicated that a third party had not yet been contracted for this but the contractor working on the Caldwell Tank may be asked to repair the Industrial Tank as well. Due to the fact that this represents a significant sanitary deficiency and ACWD had not made any progress

on getting the repair made. Within fifteen (15) days of the receipt of this correspondence ACWD must provide the Division with a schedule and method to repair the tank.

Failure to maintain tanks in the distribution system is a violation of Division Rule 0400-45-01-.17(33) which states in pertinent part... "All public water systems shall properly maintain their distribution system finished water storage tanks and clearwells."

Other items that were mentioned in the sanitary survey letter are currently being worked on or contracted including repair of the scales that feed chemical at the water treatment plant and the raw water meter and pump controls at the plant intake. ACWD should be aware that the items mentioned in the sanitary survey letter should also be finished no later than November 30, 2022.

If you have any questions or need additional information, please contact Thomas Killion at (615) 347-6912 or Thomas.killion@tn.gov.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Timmy Jennette".

Timmy Jennette,
Field Office Manager
Nashville Environmental Field Office
Division of Water Resources

Ecocy: Tom Moss, TDEC Enforcement Unit, tom.moss@tn.gov
Jeff Bagwell, TDEC Compliance Unit, jeff.bagwell@tn.gov
Thomas Killion, TDEC-DWR, Nashville Field Office, Thomas.killion@tn.gov
Michael Murphy, Program Manager, DWR-NEFO, michealp.murphy@tn.gov
Clint Biggers, Public Works Director, cbiggers@ashlandcitytn.gov
Kris Justice, Certified Operator, kjustice@ashlandcitytn.gov
Brian Stinson, Certified Operator, bstinson@ashlandcitytn.gov
Emily Jernigan, DWR-NEFO, Emily.jernigan@tn.gov

Efile