



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

Johnson City Environmental Field Office  
2305 Silverdale Road  
Johnson City, TN 37601

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November 15, 2023

Mr. Daniel Estes  
City Manager  
e copy: DEstes@CityofElizabethton.org  
City of Elizabethton  
136 Sycamore St.  
Elizabethton, TN 37643

**RE:    Pretreatment Compliance Inspection (PCI)**  
Elizabethton Sewage Treatment Plant (STP)  
NPDES Permit No. TN0023515  
Carter County

Dear Mr. Estes:

On October 26, 2023, Mr. Corey Click with the Tennessee Department of Environment and Conservation, Division of Water Resources (the division), performed a pretreatment compliance inspection of the City of Elizabethton's pretreatment program. The PCI was performed to evaluate and provide assistance to Elizabethton's pretreatment program, and to ensure compliance with Elizabethton's NPDES permit and State and Federal Pretreatment Rules. The division would like to thank Mr. Ed Mullins for his time and assistance during the inspection. Please see the attached *POTW Pretreatment Compliance Inspection Checklist* and the sections below for details regarding the PCI.

The following deficiency was noted from review of control authority (CA) sampling records.

1. The sampling for CA compliance monitoring at Tri-City Plating is conducted by Elizabethton, and the analyses are performed by Pace Analytical Services (Pace). Based on records made available during the inspection, pH results were recorded directly onto chain-of-custody (CoC) forms in Pace reports. While the pH results were recorded on the CoC forms, other information as required by State Rule 0400-40-14-.12(15)(a), such as analytical technique/methods used, were not. In addition, State Rule 0400-40-14-.07 requires analysis of samples to be performed in accordance with Title 40 Code of Federal Regulations (CFR) part 136. Title 40 CFR 136.3(e) Table II requires pH to be analyzed within 15 minutes of sample collection. Based on the information recorded on the CoC forms reviewed, it is unclear if this requirement is being met. It should be noted that this deficiency was previously identified in the Notice of Violation letter dated July 14, 2023, and the City of

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Elizabethton addressed this deficiency in the corrective action plan dated July 14, 2023. Therefore, no further action is necessary at this time.

The following comments/observations from the PCI were noted.

1. As part of the pretreatment compliance inspection, a site inspection was performed at Tri-City Plating. The following comment/observation was noted:
  - a. The composite sampler used to gather composite samples for the Industrial User (IU) self-monitoring is positioned underneath the clarifier located on the other side of the wall from the main wastewater collection sump and pH adjustment tank. The tubing leading from the sample point to the sampler was observed to be dirty. The division recommends that the tubing be replaced periodically to help ensure samples that are representative of the discharge.

Compliance with pretreatment program requirements helps to protect wastewater treatment systems, fish and aquatic life and stream quality. Thank you for your efforts to ensure compliance and to protect state water quality. If I may be of assistance in matters concerning this report, please contact me via telephone at (423) 426-6477 or via email at [corey.click@tn.gov](mailto:corey.click@tn.gov).

Sincerely,



Corey Click  
Environmental Consultant I  
Division of Water Resources  
Johnson City Environmental Field Office

cc: Mr. Johnathan Pleasant, Water Resources General Manager, City of Elizabethton (via email)  
Mr. Ed Mullins, Facilities Manager, City of Elizabethton (via email)  
Mr. William Parks, DWR Program Coordinator, Johnson City EFO (via email)  
Ms. Maybelle Sparks, DWR Water-Based Systems Unit, Nashville (via email)  
Ms. Sarah Elias, DWR Compliance and Enforcement Unit, Nashville (via email)  
Mr. Gordon Holcomb, DWR Pretreatment Staff, Nashville (via email)  
File Copy, DWR, Johnson City EFO  
WaterLog database