



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JACKSON ENVIRONMENTAL FIELD OFFICE  
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November 15, 2023

The Honorable Eric Jordan  
Mayor, Town of Bells  
E copy: BellsMayorJordan@yahoo.com  
P. O. Box 760  
Bells, Tennessee 38006

RE: **Compliance Evaluation Inspection**  
City of Bells Wastewater Lagoon  
NPDES Permit No. TN0026247  
Crockett County

Dear Mayor Jordan:

On November 2, 2023, as a representative of the Tennessee Department of Environment and Conservation, Division of Water Resources (The Division), Jackson Environmental Field Office, I conducted a Compliance Evaluation Inspection (CEI) of the City of Bells' Wastewater Lagoon. During the inspection, the wastewater treatment lagoon and the wastewater laboratory were evaluated to determine the status of compliance with your National Pollutant Discharge Elimination System (NPDES) permit. The Division thanks Marlon Jordan, Jr. and Angel West for their time and assistance.

### **I. Permit**

The permit covers the discharge of treated municipal wastewater from Outfall 001 to the South Fork Forked Deer River at mile 36. The discharge consists of treated municipal wastewater from the City of Bells' wastewater collection and treatment system as well as the influent from Pictsweet Corporation. The treatment lagoon has a design capacity of 2.75 MGD. A 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. Consistently, records were available upon request, efficiently filed, backed up electronically, accurately transcribed, complete and current.

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

Bells Wastewater Lagoon is a major municipal facility that operates a five-cell lagoon system. Domestic influent and Pictsweet influent combine to enter the influent pump station. The lagoon system consists of cell #1 being an anaerobic covered lagoon, cell #2 being an aerated lagoon, and cell # 3-4 being facultative lagoons. Cell number 5 is a polishing pond. A hypochlorite drip has been added between lagoons 4 and 5. A clarifying pond follows the lagoons and the effluent discharges through pumps to the South Fork Forked River at mile 36. If the pH reaches a low level, sodium hydroxide is dripped at the influent pump station. The Bells Wastewater Lagoon does have an emergency generator capable of running the influent pump station should loss of power be an issue. The Bells Wastewater Lagoon currently has one certified operator that holds certification for Biological Natural Systems and Grade Two Collections. The collection system was not a part of this inspection. Before this CEI, the EPA CDX system and State Compliance records from October 2021 through September 2023 were reviewed and showed the facility to have had 26 exceedances of their permit effluent limits: Three for CBOD effluent, four for CBOD % removal, seven for *E. coli*, two for ammonia as N, and ten for Total Suspended Solids.

### **IV. Effluent/Receiving Waters**

The outfall location at the receiving stream (South Fork Forked River at mile 36) was not observed during this inspection.

### **V. Flow Measurement**

Influent and Effluent flow is measured by magnetic meters have not been calibrated annually since 2021.

### **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, and total residual chlorine. Nitrogen total as N, phosphorus total as P, ammonia as N, settleable solids, carbonaceous biochemical oxygen demand (CBOD), *E. coli*, total suspended solids and biomonitoring are being subcontracted to Waypoint Analytical in Jackson. The subcontract laboratory was not evaluated as part of this inspection. Two areas that need to be brought into compliance in the laboratory were identified:

1. Total Residual Chlorine needs to be tested per your permit and QA/QC (Quality Assurance/Quality Control) measures per Title 40 CFR Part 136 need to be implemented for testing.
2. Laboratory instruments must be calibrated annually.

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

During the period evaluated for the purpose of this inspection no biosolids were removed from the treatment lagoons.

**VIII. Additional Comments and Recommendations**

Please implement Total Residual Chlorine testing and the required QA/QC. In addition, instrumentation and flow meters must be calibrated annually.

**IX. Conclusion**

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

Sincerely,

A handwritten signature in blue ink that reads "Tammy Miller". The signature is written in a cursive style.

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

cc: Marlon Jordan, Jr, Certified Operator (via email)