



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

Columbia Environmental Field Office
1421 Hampshire Pike
Columbia, TN 38401
1-888-891-8332

OFFICE CORRESPONDENCE

Date: November 16, 2021

To: Anna Sartors, DW Unit Manager
Files

From: Sherry Glass, Columbia Field Office

Re: Compliance Review Meeting
Decherd Water System
PWSID #0000187
Franklin County

Columbia EFO staff conducted a Compliance Review Meeting with representatives of the Decherd Water System (PWSID #0000187) in Franklin County. Recurring non-compliance issues and significant deficiencies were identified during the September 2021 sanitary survey. Eric Bradford, Water Superintendent, Tom Summers, Distribution Operator, and Mayor Michael Gillespie, were in attendance representing the system. A Letter of Agreement was executed during the meeting.

Compliance Review Meeting

Decherd Water System

November 16, 2021

10:00 AM

1. Introduction and Purpose of Meeting

During the September 2021 sanitary survey, Significant deficiencies and redundant instances of noncompliance with State Drinking Water Regulations relating to the operation of the water treatment and distribution system were identified. The purpose of this meeting is to review the deficiencies with system personnel, reinforce the importance of returning to compliance and agree to a course of action that will ensure future compliance.

2. Presentation of Non-Compliance Issues

- Revised Emergency Operations Plans (EOP) must be submitted to the Division every 3 years. Your last EOP is dated February 2018 and is past due.
- The Decherd Water System has 2 wells (Well #3 and Well #4) that have collapsed and are in need of immediate attention. Well # 3 is still in use but has a collapse at the surface that is allowing surface water to flow in and around the casing, possibly infiltrating the source. Well #4 is collapsed inside the casing and or screen after the removal of the pump for repairs. This well is unavailable for use due to the collapse.
- Wellhead Protection Plans must be updated every 3 years with new pictures. Decherd's last plan was approved July 6, 2018 and is past due.
- The Decherd Water System did not calibrate benchtop and inline turbidimeters every three months (90 days) as required by Rule 0400-45-01-.17(40). The turbidimeters were not calibrated as required during the first and third quarters of 2021.
- The Decherd Water System has a leaking chlorine injector for Filter #3 and a broken flow adjustment valve handle for the in-line turbidimeter on Filter #1.
- The Decherd Water System has a broken exhaust fan in the chlorine room.
- The vents need to be properly screened on both outside clearwells.
- The security fencing at the Nursery and Nissan Tanks needs to be cleared of brush and vines.

- All water tanks and clearwells require professional inspection at least every five years. The most recent professional inspection report for the Little Mountain Tank was from February 19, 2016.
- The Decherd Water System did not document or maintain disinfection/flushing records for a new line project (#21-0320).
- The Decherd Water System did not collect the correct number of bacteriological samples from the new line project (#21-0320).
- The Decherd Water System did not adequately document disinfection procedures for the robot when the Nissan Tank was inspected December 2, 2019.
- The Decherd Water System did not collect a bacteriological sample from the Nissan Tank after the 2019 robot inspection.
- The Decherd Water System has not maintained an adequate flushing program since the previous Sanitary Survey.
- The Decherd Water System did not follow its Cross Connection Program in conducting surveys of new and existing residential customers (Section III B. of the Cross Connection Control Plan).

3. Discussions of Actions Required to Return to Compliance

- The Decherd Water System must submit an updated EOP to the Division for review and approval by November 15, 2021.
- The Decherd Water System must secure the services of a licensed well driller and/or engineer to inspect both Wells #3 and #4 and submit a report to the Division by November 30, 2021, stating how and on what time schedule the repairs will be addressed.
- The Decherd Water System must submit an updated Wellhead Protection Plan to the Division by November 15, 2021.
- The Decherd Water System must repair the leaking chlorine injector for Filter #3 and the broken flow adjustment valve handle for the in-line turbidimeter on Filter #1 by November 30, 2021.

- The Decherd Water System must repair or replace the broken exhaust fan in the chlorine room by November 30, 2021.
- The Decherd Water System must calibrate all turbidimeters every three months (90 days). All calibrations must be recorded and available for review.
- Proper Number 24 mesh vent screens must be in place on both outside clearwells by November 30, 2021. Photos of the completed work must be submitted to the Division.
- Brush and vines at the Nursery and Nissan Tanks must be cleared by November 30, 2021. Photos of the completed work must be submitted to the Division.
- The Little Mountain tank will be professionally inspected by December 31, 2021. A written report based on the inspection will be produced and maintained on file by the water system.
- The Decherd Water System must make and maintain disinfection/flushing records for all new line projects (and repairs).
- The Decherd Water System must collect the required number of bacteriological samples at the required intervals (beginning, end, and every 2,500') on new line construction.
- The Decherd Water System must record and maintain disinfection procedure records when tanks are inspected either by robot, diving, or draining.
- The Decherd Water System must collect the required bacteriological samples when the interior of tanks or clearwells are inspected or repairs are made.
- The Decherd Water System must maintain an adequate flushing program in order to maintain a chlorine residual of not less than 0.2mg/L in all parts of the distribution system. All flushing activities will be adequately documented. Flushing records will include, among other items, date, time, location, person(s) responsible, length of flushing, as well as beginning and ending chlorine residuals.
- The Decherd Water System must continue to implement a working Cross Connection Program including conducting surveys of new and existing residential customers (Section III B. of the Cross Connection Control Plan).

4. Comments from System Officials

- The sanitary survey letter was received 11/2/21.
- Eric Bradford stated that he would be delivering papers to the Columbia EFO on 11/16/21 including the following items:
 1. An updated EOP.
 2. A letter from a professional engineer regarding the Well #3 and Well #4 collapses along with recommendations of actions for the City to take.
 3. An updated Wellhead Protection Plan
- The flow adjustment handle has been repaired. The chlorine injector repair status is planned but not completed.
- Exhaust fan has been repaired.
- Decherd has contracted with Labtronix to calibrate the turbidimeters every 90 days. There was discussion that the operators need to know how to perform the calibration if one needs to be done before Labtronix visits and that the operator would need to demonstrate proficiency of performing the calibration to a Division inspector at the next site visit.
- Mesh screen has been ordered for the clearwell vents but has not been received. It was suggested that some type of covering (zip tie door screen, perhaps) needs to cover the openings in the interim until the screens arrive to prevent things from entering the clearwell. Pictures of the temporary repair need to be submitted to Lane Smith. Once received, pictures of the installed wire mesh screens should be submitted to Lane Smith.
- Maintenance at the Nursery and Nissan Tanks has begun but is not complete. Site pictures will be sent to Lane Smith upon completion.
- Little Mountain Tank has been professionally inspected, but the report has not been received. A copy of the inspection report will be sent to Lane Smith upon receipt.
- The Decherd Water System personnel admitting not following proper bacteriological sampling practices and not maintaining adequate records for construction project #21-0320. Division staff commented that other systems have Standard Operating Procedures (SOP) written for subcontractors to follow. Decherd personnel commented that they may develop a checklist rather than a SOP.
- System officials stated that the ROV used to inspect the Nissan Tank on December 2, 2019, was disinfected according to the professional tank inspection report. A copy of the report was requested. This may be an oversight that occurred during the records review during the sanitary survey.

- The Decherd Water System personnel admitted not following proper bacteriological sampling practices following inspection of the Nissan Tank after the 2019 inspection.
- Adequate flushing-The Decherd Water System personnel reiterated the comment made during the sanitary survey that they would not flush purchased water onto the ground.
- The Decherd Water System will be making changes to its Cross Connection Plan and will be follow the plan specifically the five-year survey of its water system for potential cross connection.

5. Conclusion/Agreements

The system must submit a written response within 30 days stating how and on what time schedule the system will address the significant deficiencies noted in item 2 Subsection C. Wellhead/Springbox Construction and item 4 Subsection B. Inspection and Maintenance of Reservoirs, Tanks and Clearwell; however, the system should address all issues of noncompliance itemized within the sanitary survey letter.

Compliance Review Meeting

Decherd Water System

November 16, 2021

10:00 AM

Attendees:


Signature

Michael Gillespie
Print Name


Signature

Eric Bradford
Print Name


Signature

Glenn T. Summers Jr
Print Name


Signature

Lane Smith
Print Name

Signature

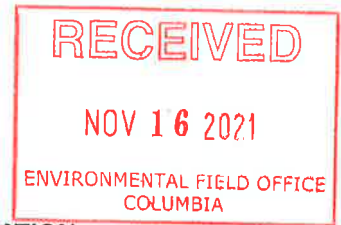
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November 16, 2021

Re: Letter of Agreement
Decherd Water System
PWSID #0000187
Franklin County

The Sanitary Survey letter dated October 26, 2021, identified recurring violations. The following course of action is agreed to by Decherd Water System in an effort to ensure continued compliance with the Safe Drinking Water Act.

- The Decherd Water System will submit an updated EOP to the Division for review and approval by November 15, 2021.
- The Decherd Water System will be operated in such a manner to ensure compliance with drinking water quality standards.
- The Decherd Water System will secure the services of a licensed well driller and/or engineer to inspect both Wells #3 and #4 and submit a report to the Division by November 30, 2021, stating how and on what time schedule the repairs will be addressed
- The Decherd Water System will submit an updated Wellhead Protection Plan to the Division by November 15, 2021.
- The Decherd Water System will repair the leaking chlorine injector for Filter #3 and the broken flow adjustment valve handle for the in-line turbidimeter on Filter #1 by November 30, 2021.

- The Decherd Water System will repair or replace the broken exhaust fan in the chlorine room by November 30, 2021.
- The Decherd Water System will calibrate all turbidimeters every three months (90 days). All calibrations will be recorded and available for review.
- Number 24 mesh vent screens will be in place on both outside clearwells by November 30, 2021. Photos will be submitted to the Division of the completed work.
- Brush and vines at the Nursery and Nissan Tanks will be cleared by November 30, 2021. Photos will be submitted to the Division of the completed work.
- The Little Mountain tank will be professionally inspected by December 31, 2021. A written report based on the inspection will be produced and maintained on file by the water system.
- The system will make and maintain disinfection/flushing records for all new line projects (and repairs).
- The system will collect the required number of bacteriological samples at the required intervals (beginning, end, and every 2,500') on new line or repair construction.
- The system will record and maintain disinfection procedure records when tanks are inspected either by robot, diving, or draining.
- The system will collect the required bacteriological samples when the interior of tanks or clearwells are inspected or repairs are made.
- The system will maintain an adequate flushing program in order to maintain a chlorine residual of not less than 0.2mg/L in all parts of the distribution system. All flushing activities will be adequately documented. Flushing records will include, among other items, date, time, location, person(s) responsible, length of flushing, as well as beginning and ending chlorine residuals.
- The system will follow its Cross Connection Program in conducting surveys of new and existing residential customers (Section III B. of the Cross Connection Control Plan).

The system must respond within 30 days stating how and on what time schedule the system will address the significant deficiencies noted in item 2 Subsection C. Wellhead/Springbox Construction and item 4 Subsection B. Inspection and Maintenance of Reservoirs, Tanks and Clearwell; however, the system should address all issues of noncompliance itemized within the sanitary survey letter.

As a duly authorized representative of the Decherd Water System, I commit to the above actions, as specified, to bring the water system into compliance with the Safe Drinking Water Act and Regulations. I understand failure to comply with any item listed in this agreement will result in further enforcement action by the Division of Water Resources.

Signed this 16th day of November 2021

A handwritten signature in blue ink, appearing to read "Steve Gillette", written over a horizontal line.

Name

A handwritten signature in blue ink, appearing to read "Mayor", written over a horizontal line.

Title

The execution of this Letter of Agreement does not constitute any waiver of the Division's right to pursue formal enforcement action for any past or future violations. Any decision as to the necessity or appropriateness of such formal enforcement action will be made after the Division's review of the facts and circumstances of the identified violations.



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- The Decherd Water System will submit an updated EOP to the Division for review and approval by November 15, 2021. **(Submitted 11/16/21)**
- The Decherd Water System will be operated in such a manner to ensure compliance with drinking water quality standards.
- The Decherd Water System will secure the services of a licensed well driller and/or engineer to inspect both Wells #3 and #4 and submit a report to the Division by November 30, 2021, stating how and on what time schedule the repairs will be addressed. **(Submitted findings only 11/16/21 for well #3. Schedule for repairs have not been submitted.)**
- The Decherd Water System will submit an updated Wellhead Protection Plan to the Division by November 15, 2021. **(Submitted 11/16/21)**

- The Decherd Water System will repair the leaking chlorine injector for Filter #3 and the broken flow adjustment valve handle for the in-line turbidimeter on Filter #1 by November 30, 2021.
- The Decherd Water System will repair or replace the broken exhaust fan in the chlorine room by November 30, 2021. **(Repairs have been made as of 11/16/21)**
- The Decherd Water System will calibrate all turbidimeters every three months (90 days). All calibrations will be recorded and available for review. **(Has contracted with Labtronix)**
- Number 24 mesh vent screens will be in place on both outside clearwells by November 30, 2021. Photos will be submitted to the Division of the completed work. **(screen ordered as of 11/16/21)**
- Brush and vines at the Nursery and Nissan Tanks will be cleared by November 30, 2021. Photos will be submitted to the Division of the completed work.
- The Little Mountain tank will be professionally inspected by December 31, 2021. A written report based on the inspection will be produced and maintained on file by the water system. **(Has been inspected/report not yet received 11/16/21)**
- The system will make and maintain disinfection/flushing records for all new line projects (and repairs).
- The system will collect the required number of bacteriological samples at the required intervals (beginning, end, and every 2,500') on new line or repair construction.
- The system will record and maintain disinfection procedure records when tanks are inspected either by robot, diving, or draining. **(Documentation was located after 2021 survey)**
- The system will collect the required bacteriological samples when the interior of tanks or clearwells are inspected or repairs are made.
- The system will maintain an adequate flushing program in order to maintain a chlorine residual of not less than 0.2mg/L in all parts of the distribution system. All flushing activities will be adequately documented. Flushing records will include, among other items, date, time, location, person(s) responsible, length of flushing, as well as beginning and ending chlorine residuals. **(Has resumed flushing 11/16/21)**

- The system will follow its Cross Connection Program in conducting surveys of new and existing residential customers (Section III B. of the Cross Connection Control Plan).

The system must respond within 30 days stating how and on what time schedule the system will address the significant deficiencies noted in item 2 Subsection C. Wellhead/Springbox Construction and item 4 Subsection B. Inspection and Maintenance of Reservoirs, Tanks and Clearwell; however, the system should address all issues of noncompliance itemized within the sanitary survey letter.

As a duly authorized representative of the Decherd Water System, I commit to the above actions, as specified, to bring the water system into compliance with the Safe Drinking Water Act and Regulations. I understand failure to comply with any item listed in this agreement will result in further enforcement action by the Division of Water Resources.

Signed this 16th day of November 2021

Name

Title

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