



THE CITY OF BRISTOL, TENNESSEE
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Public Works Department
Water Filtration Division

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July 17, 2015

Certified Mail

Mr. Bryan B. Carter
Environmental Protection Specialist
Division of Water Resources
Johnson City Environmental Field Office
2305 Silverdale Road
Johnson City, TN 37601-2162

**Re: Compliance Evaluation Inspection (CEI)
Bristol WTP
NPDES Permit TN0074292**

Dear Mr. Carter:

We have received your June 19, 2015, letter reporting on the findings of the CEI you performed at the Bristol WTP on June 4, 2015. We are writing to provide responses to the concerns and deficiencies you noted and propose our schedule for implementing changes.

Concern I.1 Discharge lines for seal water from the high service pumps entering floor drains connected to a storm drain.

Response Bristol WTP proposes to redirect the floor drains in the high service pump building to an adjacent septic tank and leach field. This will eliminate the concern about this seal water being discharged to surface water. Weather permitting; we expect to complete this piping change within 30 days.

Deficiency II.1 Available records did not include all information required by NPDES permit.

Response Bristol WTP has revised its procedures to assure that all required information is collected and properly recorded.

Concern V.1 Flow measurement frequency not accurately reflected on monthly DMRs.

Response	As you noted, the Bristol WTP records flow measurements more frequently than required by permit. We will note the actual recording frequency on future Discharge Monitoring Reports (DMRs).
Deficiencies VI.1	The pH probe storage.
Response	The lab has taken steps to assure the pH probe will be maintained in the appropriate storage solution. Furthermore, the lab has purchased a pH probe to be used specifically for NPDES sampling in order to limit the number of users.
Deficiencies VI.2	The procedures and documentation of pH analyses.
Response	Operators have been constructing a standard operating procedure using the guidance provided during the inspection as well as support from TAUD. The lab has updated procedures to include all necessary components of proper laboratory quality assurance and quality control required by Title 40 CFR Part 136.7. We expect to complete the development of these SOPs within 30 days and implement them within 30 days thereafter.
Deficiencies VI.3	The procedures and documentation of total residual chlorine analyses.
Response	Using the guidance provided during the inspection as well as from TAUD, operators have been updating standard operating procedures and bench sheets to include all components of proper laboratory quality assurance and quality control required by Title 40 CFR Part 136.7. We expect to complete the development of these SOPs within 30 days and implement them within 30 days thereafter.
Concern VIII.1	Open floor drains in secondary containment areas.
Response	Bristol WTP proposes to install drain covers or removable plugs on these drains. The covers or plugs will maintain the drain in a normally closed condition. They will be removed only when authorized by the Superintendent to allow periodic wash down of the areas after inspection verifies the area is clear of significant chemical residue. This practice will prevent the inadvertent release of chemicals to the onsite holding lagoons. We expect to implement this change within 30 days.
Concern VIII.2	Hose for offloading sodium hypochlorite found overhanging the containment area.

Response

This hose has been positioned inside the containment area, where it will be stored when not in use.

Be assured that Bristol WTP is committed to operating our facility in a manner protective of downstream fish and aquatic life and water quality. Please contact me at the Bristol WTP (423-989-5576) or via cell phone (423-340-2371) if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David St. John".

David St. John
Superintendent / Utilities Services Manager
Bristol Water Treatment Plant

cc: Mr. Brown Patton, DWR, JCEFO
Mr. Kevin Rice, DWR, JCEFO
DWR Compliance and Enforcement Unit, Nashville
Mr. Timothy H. Beavers, Director of Public Works, City of Bristol, TN
Mr. Tom Green, Senior Project Manager, EnSafe, Nashville, TN