



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Water Resources
JACKSON ENVIRONMENTAL FIELD OFFICE

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January 5, 2022

Certified Mail #: 7020 2450 0002 2246 6316
Return Receipt Requested

The Honorable Joseph Lewis, Mayor
Town of Woodland Mills
201 Cannon Moores Drive
Union, TN 38261

RE: Notice of Violation/Compliance Evaluation Inspection (CEI)
Town of Woodland Mills Collection System
State Operating Permit No. SOP-14019
Union, Obion County, Tennessee

Dear Mayor Lewis:

On December 8, 2021, Ms. Tammy Miller with the Tennessee Department of Environment and Conservation, Division of Water Resources conducted a compliance evaluation inspection (CEI) of the above referenced facility in order to evaluate compliance with your proposed State Operating Permit (SOP). The Division thanks Mr. Paul Truett for his time and assistance.

I. Permit

The Town of Woodland Mills initially applied for a State Operating Permit in 2014. The permit application was deemed incomplete with notification to the Town of Woodland Mills being made on October 14, 2014 of the incomplete status and need for additional information. A completed permit application was never submitted to the Division's Permit Section. As a result, Woodland Mills has been operating its collection system without permit coverage. This is a violation of the Tennessee Water Quality Control Act, §69-3-108 (c) which states that: Any person operating or planning to operate a sewerage system shall file an application with the commissioner for a permit or, when necessary, for modification of such person's existing permit. Unless a person holds a valid permit, it is unlawful to operate a sewerage system.

II. Records/Reports

No records have not been sent to the Jackson Environmental Field Office to document amount of wastewater sent to Union City STP.

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

The Town of Woodland Mills collects wastewater from residences and transports it through two pumping stations to Union City STP. The Town of Woodland Mills collection system consists of two pump stations that were inspected and found to be operating properly and well maintained. The main pump station has emergency power available as well as external pumps in the event of failure of the pump station's internal pumps.

The operator in charge holds a CS1 license.

IV. Flow Measurement

Flow is measured at the main pump station and calculated minus the flow of Williams Sausage as they share the pump station.

V. Laboratory

No laboratory analysis is performed by the Town of Woodland Mills.

VI. Biosolids Handling/Disposal

All wastewater is sent to Union City STP through 3.5 miles of force main.

V. Additional Comments and Recommendations

- **To gain compliance for the Woodland Mills collection system, a complete application for a State Operating Permit must be submitted to the Division of Water Resources Permit Section by March 15, 2022.**
- A record of pumpage from the Woodland Mills collection systems needs to be maintained and should include the time, date, location, amount of wastewater in gallons that is sent to Union City STP for treatment.

VII. Conclusion

Compliance with a valid state operating permit helps ensure there will be no unpermitted discharge of wastewater to any surface stream or other location where it is likely to enter surface waters. On behalf of the Division and in advance, I want to thank you and your staff for your efforts to ensure permit compliance and to protect state water quality. If I may be of assistance in matters concerning this report, please contact me Ms. Tammy Miller via telephone at (731) 458-7080 or via email at Tammy.Miller@tn.gov.

Sincerely,

A handwritten signature in cursive script that reads "Conner Franklin".

Conner Franklin
Environmental Program Manager
Jackson Environmental Field Office
Division of Water Resources

Copy: Mr. Paul Truett, truett@bellsouth.net
Waterlog