



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
1625 HOLLYWOOD DRIVE
JACKSON, TENNESSEE 38305-4316
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April 20, 2021

Mr. Dick Adams
North Utility District of Decatur and Benton Counties
e-copy: Inud@tds.net
P.O. Box 54
Parsons, Tn 38363

RE: Compliance Evaluation Inspection (CEI) -
North Utility District of Decatur and Benton Counties – TN0074390
Parsons, Decatur County, Tennessee

Dear Mr. Adams:

On April 8, 2021 as a member of the Division of Water Resources (The Division), I performed a routine compliance evaluation inspection (CEI) at the above referenced facility to evaluate compliance with your Water Treatment Plant Filter Backwash Discharge Permit. Please see the sections below for details regarding the inspection.

I. Permit

The permit covers the discharge of effluent from the filter backwash system at the North Utility District of Decatur and Benton Counties (The District) Water Treatment Plant in Parsons, Decatur County, Tennessee. Effluent from the backwash system is stored in 2 onsite sedimentation basins. The basins discharge on an as need basis to “Outfall 001”. The receiving stream is Jordan Spring Branch, a tributary of Cub Creek. The system has had an average finished water production of 0.225 mgd over the past 12 months.

II. Records/Reports

A review of the facility’s self-monitoring records was performed. Monitoring records were available upon request, consistently reported monthly via NetDMR, accurately transcribed, generally complete and current.

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

The plant is described as a “turbidity removal” operation using sodium hypochlorite, poly aluminum chloride and polymer. Monitoring is performed as prescribed by the permit. During the 5-year period

prior to this inspection the District reported only 2 effluent limitation exceedances. Both exceedances were for the parameter "Aluminum, total (as Al)".

IV. Flow Measurement

Flow is monitored by the meter measuring the amount of water used in the filter backwash operation.

V. Laboratory

Total Residual Chlorine (TRC) and pH are performed in house. One deficiency was observed with in-house testing:

1. The calibration of the meter used to analyze TRC was not being verified using primary and/or secondary standards as required by the 40 CFR Part 136 approved method. Please identify and implement appropriate calibration verification protocols as soon as practicable.

All other parameters are subcontracted to Pace Analytical in Mt. Juliet, TN. The subcontract laboratory was not evaluated as part of this inspection.

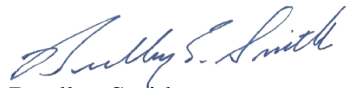
VI. Sludge Handling/Disposal (or Biosolids Handling/Disposal)

Basin sludge removal was last performed in October 2017 by local a pumper (Lynn Moore). The sludge was disposed of on a nearby land application located off Hwy 641. The site has been approved by the Division.

VII. Conclusion

Compliance with your NPDES requirements helps ensure discharges that are protective of downstream fish and aquatic life and water quality. Your efforts will help ensure permit compliance and protect state water quality. If I may be of assistance in matters concerning this report, please contact me via telephone at (731) 512.1312 or via email at bradley.e.smith@tn.gov.

Sincerely,



Bradley Smith
Environmental Consultant
Division of Water Resources
Jackson Environmental Field Office

cc: Bradley Smith, DWR Environmental Consultant I, JEFO (via email)
Cassi Savage, DWR Compliance Unit, Nashville (via email)