



State of Tennessee
Department of Environment and Conservation

Knoxville Environmental Field Office

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February 15, 2024

Dr. Tim Parrott

Email to: TParrott@acs.ac

Superintendent of Schools

101 S. Main Street

Clinton, Tennessee 37716

RE: **Compliance Evaluation Inspection (non-sampling)**
Anderson County Schools - Dutch Valley Elementary School
NPDES permit #TN0057878
Anderson County, Tennessee

Dear Dr. Parrott:

On February 9, 2024, Brad Antone of the Division of Water Resources (The Division), performed a routine compliance evaluation inspection (CEI) at Anderson County Schools - Dutch Valley Elementary School to evaluate compliance with National Pollution Discharge Elimination System (NPDES) Permit # TN0057878. The inspection consisted of a records review from March 8, 2022, to February 9, 2024, and a site walk-through. The Division appreciates Mr. David Moore and Mr. Michael Foust for providing information necessary to conduct this inspection, as well as a tour of the facility. The inspection results and findings have been summarized below.

I. Facility Description

This facility discharges treated domestic wastewater to unnamed tributary at mile 2.2 to Brushy Fork Creek through one permitted outfall. The property is located at 1044 Old Dutch Valley Rd. Clinton, TN 37716. Anderson County Schools - Dutch Valley Elementary School is identified as a sewerage system (SIC 4952).

II. Permit

NPDES Permit # TN0057878 authorizes Anderson County Schools - Dutch Valley Elementary School to discharge treated domestic wastewater from outfall 001 into unnamed tributary at mile 2.2 to Brushy Fork Creek at mile 11.1. There are no other authorized discharges covered under this permit.

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The current NPDES discharge permit is effective from April 1, 2023, to March 31, 2028. Under the permit, Anderson County Schools - Dutch Valley Elementary School is required to grab sample for the following parameters at Outfall 001: Dissolved oxygen (DO), flow, and total residual chlorine (TRC) - five days per week; pH, and settleable solids - two days per week; and total suspended solids (TSS), nitrogen, ammonia, E. coli, and CBOD - monthly. Flow is measured by weir level indicated instantaneously.

Additional monitoring at the outfall requires there be no distinctly visible floating solids, scum, foam, oily slick, or the formation of slimes, bottom deposits or sludge banks that may be detrimental to fish and aquatic life.

III. Records/Reports

The system experienced an unexpected loss of certified operator since the previous inspection. A copy of the current permit was provided during the inspection. With the new operator taking over without the opportunity for a turnover period, some requirements of the permit are not being met. These missed requirements are identified below:

- Contrary to the permit, section 1.3.1., Monthly Operations Reports (MOR's) and Discharge Monitoring Reports (DMR's) are being signed by the operator. The permit states that MOR's, DMR's, and any other information or reports are to be signed and certified by a responsible corporate officer as defined in Tennessee Rules, Chapter 0400-40-05-.07(2)(i), a general partner or proprietor, a principal municipal executive officer or ranking elected official, or his or her duly authorized representative. If a duly appointed representative is to be signing the forms, this person is required to be identified in writing and notification sent to the Division. The Division has not received documentation appointing Mr. Foust as the signature authority on MOR's and DMR's.

- Contrary to the permit, section 1.3.1., a signed and certified copy of MOR's are not being sent to the Division per the email addresses listed in this section of the permit. MOR's are currently being sent to Mrs. Sarah Snyder in the environmental field office, but they are not signed and certified copies. MOR's are required to also be submitted to DWRWW.Report@tn.gov. Please note that the email address, TDEC.Chattanooga.EFO@tn.gov is the incorrect email address, as the Knoxville EFO is this facility's regional field office. This has been identified to the permit writers. At this time, the Division requests MOR's continue to be submitted to Ms. Sarah Snyder at Sarah.Snyder@tn.gov and DWRWW.Report@tn.gov. These MOR's must be signed by personnel identified per the requirements of section 1.3.1. of the permit, and as discussed in the paragraph above.

- MOR's for November and December of 2022 were not submitted to the Division. A review of the MOR's indicate that this period was during an operator transition, and therefore the normal routines of the system were not being followed.

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IV. Facility Site Review, and Operation and Maintenance

This facility is an older package plant with some rust and areas of coating/paint peeling. The plant has extended aeration with activated sludge, clarifier, chlorination chamber, and dechlorination. There was a trickle of flow going through the system during the inspection. Pumps appeared to be in working order and on timers. There were no foul odors, or any noticeable issues during the inspection. The operator and maintenance personnel have done a good job maintaining this old plant, in good working order. Mr. Moore indicated that sludge is periodically pumped (usually on an annual basis).

V. Sampling, Laboratory, and Flow Measurement

Mr. Moore and Mr. Foust conduct sampling and analysis requirements of the permit. pH, TRC, and DO are conducted on premises, five days per week. All other parameter analysis is conducted at the laboratory for Rocky Top Wastewater Treatment Plant (WWTP). Rock Top WWTP lab recently had an audit performed by Division personnel and was found to be operating within the requirements of the Division.

Flow is measured by instantaneous measurement at the weir, and reported each day the school is open.

LabtroniX conducts annual calibrations on analysis equipment, and last completed calibrations in August 2023.

VI. Effluent and Receiving Waters

The receiving stream appeared in good health, with indications of aquatic life present at the outfall. The required outfall signage was in place, with the required information.

VII. Conclusion and Recommendations

The inspection indicates Anderson County Schools - Dutch Valley Elementary School is in compliance with the requirements of their permit. The Division would like to thank Mr. David Moore and Mr. Michael Foust for the welcoming atmosphere and tour of the facility.

Within 30 days of the date of this letter, please provide the following to the Division:

- Notification of signatory authority to the Division.
- MOR's for November and December of 2022, if available.
- Ensure submittal of MOR's are signed and submitted to Mrs. Sarah Snyder at Sarah.Snyder@tn.gov, as well as to DWRWW.Report@tn.gov, per the permit.

Dr. Tim Parrott
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The Division is transitioning to sending correspondence via email. This CEI report will only be sent via email unless a paper copy is requested. Should you have any questions, please do not hesitate to call me at (865) 323-8650 or email at Brad.Antone@tn.gov.

Sincerely,



Brad Antone, Environmental Scientist 2
Knoxville Environmental Field Office
Division of Water Resources
Email: Brad.Antone@tn.gov

cc: Nashville Central Office – via WaterLog Database
Mr. Clay McKarney, Director of Maintenance, Anderson County Schools – via email
Mr. Michael Foust, Certified Operator in Charge – via email