

Wade Murphy

From: Bains, Susanna <Bains.Susanna@epa.gov>
Sent: Thursday, February 15, 2024 11:13 AM
To: Vojin Janjic
Cc: Wade Murphy; Holliman, Daniel
Subject: [EXTERNAL] EPA comments on Memphis Regional Megasite WWTP (TN0081906)

Vojin,

In accordance with the U.S. Environmental Protection Agency/State of Tennessee Memorandum of Agreement (MOA) Section IV, EPA is providing the below comment and recommendation to the above-referenced draft individual National Pollutant Discharge Elimination System (NPDES) Permit and supporting documents received by the EPA on January 23, 2024.

- Federal regulations at 40 CFR § 122.29(d)(4) state that within the shortest feasible amount of time (not to exceed 90 days), the owner or operator of a new source or new discharger shall “start-up” all pollution control equipment required to meet all the conditions of its permit.
- EPA recommends allowing up to 90 days from the initiation of start-up to the completion of start-up and enforceability of all effluent limits.
- Note that secondary treatment effluent limits are not eligible for a longer compliance schedule under 40 CFR § 122.47.

Prior to the issuance of a final permit, TDEC is responsible for compiling all significant comments received during the public comment period and responding to all significant comments in accordance with 40 CFR § 124.17(a). EPA requests to review the proposed final permit prior to issuance.

This concludes our review of the draft permit. If you have any questions about the comment and recommendation, please let me know.

Thanks,

Susanna Bains
NPDES Permitting Section
Water Division, EPA Region 4
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