



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
DIVISION OF WATER RESOURCES
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April 19, 2024

The Honorable Eric Jordan
Mayor
City of Bells
P.O. Box 760
Bells, TN 38006

RE: **Pretreatment Compliance Inspection (PCI)**
Bells Lagoon
NPDES Tracking No: TN0026247
Bells, Crockett County, Tennessee

Dear Mayor Jordan,

On April 9, 2024, as representatives of the Tennessee Department of Environment and Conservation, Division of Water Resources, Ms. John Bowling and I performed a routine compliance inspection at the above referenced facility to evaluate the City of Bells's compliance with pretreatment program requirements of NPDES Permit TN0026247. The Division thanks Mr. Marlon Jordan, Jr., and Ms. Angel West for their time and assistance. Please see the sections below for details regarding the inspection.

I. Permit

NPDES Permit No. TN0026247 authorizes the City of Bells Wastewater Lagoon to discharge treated municipal wastewater from Outfall 001 into the South Fork Forked Deer River at mile 36. The permit was effective on October 1, 2021, and it expires on September 30, 2026.

II. File Review

The City of Bells has one non-categorical permitted industry, the Pictsweet Company, discharging to the wastewater treatment facility.

A file review was conducted on the industrial user (IU) to determine the following:

- i. The individual user permits issued by the Control Authority (CA) met the necessary criteria.
- ii. The required records, reports, and inspection documents were on file and readily available.

Pretreatment Compliance Inspection

City of Bells

April 19, 2024

Page 2

- iii. That the IUs, through examination of the previously mentioned documents, have remained in compliance with the pretreatment program permit limits and self-monitoring requirements set forth by the Control Authority (CA).

On the Semi-Annual Report (SAR) for April 2023 to October 2023, it was noted that the Pictsweet Company had a violation on E. Coli in July of 2023 and was given a verbal warning. However, E. Coli is not listed as a parameter to be monitored in the Industrial User (IU) Permit. The City of Bells can choose to test for E. Coli, and it should be noted in the SAR. Since the parameter is not listed in the IU Permit, it is not enforceable. If the City of Bells wants to enforce E. coli violations, it is recommended a provision is added to the IU permit that allows the City of Bells to sample the Pictsweet Company for E. Coli and enforce if it can be proven that a passthrough exceedance has occurred.

The monthly sampling reports from the Pictsweet Company do not include the required signatory certification and date. Please ensure that monthly sampling reports are submitted with the proper signatory certification and date. The file review determined that documentation and records have been well maintained and the IU review appeared to be in compliance at the time of inspection.

III. Site Visit

A site visit was conducted of the Pictsweet Company's pretreatment program effectiveness, compliance, and overall impact. The Pictsweet Company is classified as a chop suey, frozen, manufacturer with frozen vegetables being their primary product. We met with Mr. Brett Lake and Mr. Dylan Cupples, with the Pictsweet Company, and they provided us a walk-through of their pretreatment process.

The industry has one wastewater discharge point. The Pictsweet Company pretreats the process water by filtering out vegetable debris before it is discharged to the City of Bells's wastewater lagoon. The vegetable waste from this filtering process is collected by Taylor Brothers. The outfall and sampling point is right before the lagoon. No observable deficiencies were noted during the site visit.

IV. Pretreatment

As mentioned above, the City of Bells must make sure that monthly reporting from the industry is signed and dated. It is also recommended that if the City of Bells wishes to enforce E. Coli violations that a provision be added to the industrial user permit that allows the City of Bells to sample the Pictsweet Company for E. Coli and enforce if passthrough exceedances occur. Please continue to maintain accurate records and documentation along with submitting necessary reports.

V. Conclusion

Compliance with permit TN0026247 requirements helps ensure discharges that are protective of downstream fish and aquatic life and water quality. Thank you for your efforts to ensure permit compliance and to protect state water quality. If I may be of assistance in matters concerning

Pretreatment Compliance Inspection

City of Bells

April 19, 2024

Page 3

this report, please contact me via telephone at 731-676-6604 or via email at Kaylee.Sabo@tn.gov.

Sincerely,



Kaylee Sabo, E.I.

Environmental Protection Specialist

Division of Water Resources

Jackson Environmental Field Office

cc: John Bowling, EI, EPS, JEFO, john.bowling@tn.gov
Honorable Eric Jordan, Mayor, City of Bells, cityhall@cityofbellstenn.us
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