



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER RESOURCES  
Memphis Environmental Field Office  
8383 Wolf Lake Drive  
Bartlett, TN 38133  
Phone 901-371-3000 Statewide 1-888-891-8332 Fax 901-371-3170

April 19, 2024

Mr. Robert Wilson  
6841 Center College Rd  
Millington, TN 38053

RE: Activation of a Transient Non-Community (TNC) Water System  
PWSID #TN0005242  
Casper Creek RV Park  
6841 Center College Rd  
Millington, TN 38053 Shelby County

Dear Mr. Wilson:

The Division of Water Resources has been made aware your facility is operating as a public water system. A public water system is defined by the Tennessee Code Annotated, 68-221-703, as “a system for the provision of piped water for human consumption if such system serves fifteen (15) or more service connections or which regularly serves twenty-five (25) or more individuals daily at least sixty (60) days out of the year.” Any arrangement that meets this definition is subject to regulation under the Safe Drinking Water Act. This letter shall serve as official notice that your system is being activated as a public water system and is classified as a Transient Non-Community Water System.

Mrs. Courtney Driver with the Division of Water Resources (DWR) visited Casper Creek RV Park on October 23, 2023, for a new site and source evaluation inspection and to facilitate discussion about water system regulations and how to commence monitoring the system. Upon arrival, Mrs. Driver met with you, Owner of Casper Creek RV Park, and Ms. Debby O’Quinn, Park Host. Your assistance and knowledge were greatly appreciated and allowed DWR staff to review the water system efficiently and effectively.

The following requirements, recommendations, and/or comments noted below are to help you establish and operate the system as an approved Transient Non-Community Water System.

1. The system has been assigned the Public Water System Identification (PWSID) Number TN0005242. Please reference this number on all records and correspondence to the Division, including, but not limited to, all bacteriological analysis and chemical forms.
2. All public water systems must pay an annual maintenance fee. Please refer to Rule 0400-45-1-.32. An invoice will be sent indicating the appropriate fee to pay.

3. Mr. Carl Stevenson has signed a Certified Operator Agreement with Casper Creek RV Park. His operator classification is Grade 3 Water Treatment and Distribution 2, which exceeds the minimum classification requirement to operate your system.
4. The following analysis/requirements will be required by their respective due dates for initial approval: After initial approval, monitoring requirements should occur as described in the [Drinking Water Watch](https://dataviewers.tdec.tn.gov/DWW/) (<https://dataviewers.tdec.tn.gov/DWW/>) Schedules.
  - a. **Bacteriological:** The water system is required to collect bacteriological samples to determine if the water has the presence or absence of bacteria. Presence of bacteria could reduce the quality of water being provided and become a health risk. A written bacteriological sampling site plan must be developed with details on how to properly collect routine and repeat samples and the locations from which to collect such samples.

The water system will be required to submit quarterly samples for bacteriological analysis to the State Laboratory or a State certified laboratory. Bacteriological sampling of the system should be conducted prior to the end of April 2024. This office will inform the State Certified Laboratory to mail the water system a bacteriological water sample bottle. To avoid a sample arriving on a weekend and the sample being classified as invalid because it surpassed the holding time, please mail the sample to the lab early in the week (Monday or Tuesday). Should one of the routine samples be total coliform-positive, the system is required to take a set of three (3) repeat samples. The set of repeat samples will be taken as follows:

- At least one of the repeat samples must be taken from the sampling tap where the original total coliform-positive sample was taken;
- At least one of the repeat samples must be taken at a tap within 5 service connections downstream from the original sampling site;
- At least one of the repeat samples must be taken at a tap within 5 service connections upstream from the original sampling site;
- The complete set of repeat samples must be taken within 24 hours of the system being notified of a positive coliform result, or when instructed to sample by the Division of Water Resources; the entire set of repeat samples must be taken on the same day.

Repeat samples must be taken until total coliforms are not detected in one complete set of repeat samples, or the system exceeds the total coliform treatment technique trigger during the month and notifies the State Department of Environment and Conservation, Division of Water Resources. Also, the water system must provide a **Public Notice** for any failure to comply with these requirements, such as failure to collect a regular sample during the quarter, failure to take the required repeat samples, one positive regular sample without the required negative repeats, or two positive samples (the regular and repeat). Additionally, instructions for collecting and mailing the water samples and filling out the water report form are printed on the back of the bacteriological slips. Please follow the instructions.

- b. **Nitrate-Nitrite and Total Nitrate-Nitrite Monitoring:** The Division requires a sample to be collected and submitted to a certified laboratory for nitrate-nitrite and total nitrate-nitrite analysis. A list of certified laboratories can be provided if requested. All non-community water systems are required to monitor for nitrate-

nitrite and total nitrate-nitrite during the initial start-up. **You have 60 days from the date of this letter to sample your water well for nitrate-nitrite and total nitrate-nitrite and submit the results to the Division of Water Resources (DWR).** After the initial start-up, all non-community water systems are required to monitor for nitrate annually. It will be your responsibility to make an arrangement with a certified laboratory to conduct this sample analysis. Your next nitrate sample must be collected by December 30, 2025.

5. **Free Chlorine Residual:** Chlorine residual is required to be tested once the system installs a chlorination system. Your system is required to maintain a minimum free chlorine level of 0.2 mg/L at all times and should not exceed 4.0 mg/L. A log of daily chlorine readings should be maintained and kept in your records. This information is to be recorded on a Monthly Operations Report (MOR) and submitted to the Division of Water Resources by the 10<sup>th</sup> day of the following month.
6. **Cross Connection and Backflow Prevention:** A cross-connection is a potential or actual link between the drinking water supply line and any pipes or devices that contain polluted water, or water of unknown quality. The backflow of polluted water into drinking water lines can occur if, for some reason, the drinking water lines lose pressure. It can also occur if water lines are connected to some device containing fluids under high pressure such as an industrial, residential, or commercial boiler. Backflow can also occur if the public water lines are connected to a home or business using a well for auxiliary water supply. The common garden hose is responsible for many cross-connections because it is usually submerged in the container it is used to fill. Maintaining an air gap between drinking water and unsafe liquids is the most effective means of backflow prevention. Keeping pressure at all times in the public water system lines enhances backflow prevention. Installing special kinds of valves in the water lines (called backflow prevention devices) can also prevent backflow. Tennessee Law prohibits allowing cross-connections to occur. Non-community water systems must be aware that cross-connections can introduce bacteria and chemicals into drinking water lines and degrade the quality of water being provided to the users. It is the responsibility of the system to perform and maintain records of systematic/annual cross-connection inspections of the facility's drinking water lines. A cross-connection statement has been included with this letter and should be completed, signed, and returned to the Division within 60 days.
7. **Wellhead Protection Plan:** The system is required to complete a wellhead protection plan for the water well.
8. Casper Creek RV Park is classified as a public water system. As such construction plans, drawings, specifications, and engineering reports, including design calculations, should have been submitted for review prior to construction. Please remit all necessary documents by **May 19, 2024**. Go to: [Plans Review and Approval for Public Water Systems \(tn.gov\)](https://www.tn.gov/plans-review-and-approval-for-public-water-systems) for additional guidance on how to submit through the TN Cloud portal. This web site also includes information on how to submit the required fee payment.
9. By **May 19, 2024**, submit water quality test results for the well including nitrate, nitrite, and coliform bacteria. Please email this documentation to [Courtney.Driver@tn.gov](mailto:Courtney.Driver@tn.gov).

For your reference, attached are blank copies of the Monthly Operations Report and disinfectant monitoring form. You can also find relevant forms and reports online: [Drinking Water \(tn.gov\)](https://www.tn.gov/drinking-water).

For future construction, please be advised that plans and specifications must be submitted to the Division for approval in advance of construction commencing. Failure to do so could result in an

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Enforcement Action Request. Please be aware that Rule 0400-45-01-.05(8)(a) states in part: No person shall operate a public water system without notifying the Division of Water Resources prior to placing the new system in operation.

We appreciate your attention to this matter. If you have any questions or otherwise need assistance, please contact me at (901) 483-0267 or by email at [Courtney.Driver@tn.gov](mailto:Courtney.Driver@tn.gov).

Sincerely,

*Courtney Driver*

Courtney Driver  
Environmental Scientist  
Division of Water Resources  
Memphis Environmental Field Office

cc: TDEC/DWR/MEFO File  
cc: TDEC/DWR/Nashville Central Office File