

Memo

To: File

Date: April 25, 2023

From: DeWitt Logsdon

Subject: Clifton NPDES Permit – TN0067423

I suggest the following item be reviewed prior to the next permit issuance:

On page 18 of the Clifton NPDES permit, it states the following for pretreatment:

3.2. POTW PRETREATMENT PROGRAM GENERAL PROVISIONS

As an update of information previously submitted to the division, the permittee will undertake the following activity.

- a. **The permittee shall submit the results of an Industrial Waste Survey (IWS) in accordance with 40 CFR 403.8(f)(2)(i), including any industrial users (IU) covered under Section 301(i)(2) of the Act. As much information as possible must be obtained relative to the character and volume of pollutants contributed to the POTW by the IUs. This information will be submitted to the Division of Water Resources, Pretreatment Section within one hundred twenty (120) days of the effective date of this permit, unless such a survey has been submitted within 3 years of the effective date. Development of a pretreatment program may be required after completion of the industrial user review. All requirements and conditions of the pretreatment program are enforceable through the NPDES permit.**

Today, I spoke to Adam Bonomo, State Pretreatment Coordinator. Since this WWTP only receives sewage from both the Turney Center Annex and the TN Dept of Corrections CCA prison facilities, an IWS is not required and can be removed from the next permit reissuance.

