



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COLUMBIA ENVIRONMENTAL FIELD OFFICE
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COLUMBIA, TENNESSEE 38401

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April 26, 2023

Honorable Mark Ledbetter, Mayor
City of Cowan
P.O. Box 338
Cowan, TN 37318

RE: Compliance Evaluation Inspection
Cowan STP
NPDES Permit No. TN0021644
Cowan, Franklin County, Tennessee

Dear Mayor Ledbetter:

On April 14, 2023, I conducted a Compliance Evaluation Inspection (CEI) of the City of Cowan Wastewater Treatment Plant. A CEI is conducted to determine compliance with the permit and to review the operation and maintenance of the treatment plant. The following observations were made during the inspection:

I. Permit

The current permit became effective on February 1, 2022, and shall expire on January 31, 2027.

II. Records/Reports

Discharge Monitoring Reports (DMRs) are being submitted using the NetDMR electronic reporting system. An electronic Monthly Operation Report (eMOR) is being submitted to the Columbia Environmental Field Office. DMRs submitted since the previous inspection were reviewed. The review indicated that there have been no violations of the permit parameters reported since the previous inspection. The facility has registered for the MyTDEC forms system for overflow and release reporting.

III. Facility Site Review and Operations and Maintenance

The treatment system consists of an influent headworks with a grit removal system, oxidation ditch, clarifiers, digester, sludge drying beds and a chlorine contact chamber. The components of the treatment system were functioning as designed during the inspection. The facility is equipped with an emergency generator in the event of a loss of power. The generator is tested weekly. A logbook is being maintained

for plant repairs and maintenance performed on the treatment system. A Standard Operating Procedures (SOP) has been developed for the treatment plant, laboratory and collection system. The treatment plant is enclosed with a perimeter fence and a locked gate. The grounds surrounding the treatment plant are well maintained.

IV. Laboratory

The laboratory is equipped to perform the analytical testing requirements of the permit. Bench sheets were available for review for each analytical test performed. The laboratory is clean and well organized. A new Hach DR 3900 Spectrophotometer has been purchased since the previous inspection. The influent and effluent composite samplers were functioning during the inspection. Each sampler is equipped with a sealed thermometer and set for flow proportional sample collection. Annual calibration of the laboratory equipment, flow meters and the composite sampler thermometers was conducted by Labtronix in December 2022.

V. Sludge Handling/Disposal

The sludge drying beds were in use during the inspection. The accumulated solids are removed from the plant and disposed of in a permitted landfill. The plant is equipped with a digester to store sludge until the drying beds are available for use.

VI. Outfall

The effluent being discharged to Boiling Fork Creek during the inspection was clear. The outfall is posted with a new sign that meets the permit requirements.

VII. Collection System

There are five lift stations within the collection system. A monthly checklist is being maintained on the system.

VIII. Additional Comments/Recommendations

1. Nic Willis is the certified wastewater treatment plant and collection system operator. Mr. Willis has a Wastewater 3 operator certification and a Collections System I certification. These certifications meet the City of Cowan's NPDES permit requirements.

IX. Conclusion

I would like to thank Mr. Willis for his time and cooperation during the inspection. If you have any questions concerning this correspondence, you may reach me at 931-222-9040 or by e-mail at gary.horne@tn.gov.

Sincerely,



Gary Horne
Division of Water Resources