

Wade Murphy

From: Bains, Susanna <Bains.Susanna@epa.gov>
Sent: Thursday, May 11, 2023 8:56 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 March 21, 2023.

- Federal regulations at 40 CFR § 122.21(b) state that when a facility or activity is owned by one person but is operated by another person, it is the operator's duty to obtain a permit. EPA recommends that if the permittee contracts out the operations of the facility, the operator should become a co-permittee prior to discharge.

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).

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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