

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION Division of Water Resources

JACKSON ENVIRONMENTAL FIELD OFFICE

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May 23, 2023

The Honorable John A. Emison Mayor, Town of Alamo 97 South Johnson Street Alamo, TN 38001

RE: Compliance Evaluation Inspection

Town of Alamo, Alamo STP NPDES TN0024988 Alamo, Crockett County

Dear Mayor Emison:

On May 2, 2023, as representatives of the Tennessee Department of Environment and Conservation Jackson Environmental Field Office, Noah Reid, Kaylee Sabo and I conducted a Compliance Evaluation Inspection (CEI) of the town of Newbern STP facility. During the inspection, the wastewater treatment plant and the laboratory were evaluated to determine the status of compliance with your National Pollutant Discharge Elimination System (NPDES) permit. The Division thanks operator Will Perry for his time and assistance.

I. Permit

The permit covers the discharge of treated municipal wastewater from Outfall 001 to an unnamed tributary to Buck Creek at mile 4.5 to the Forked Deer at Mile 118. The discharge consists of treated municipal wastewater from the Town of Alamo's wastewater collection and treatment systems. The treatment plant has a design capacity of 0.4 MGD. A copy of the permit was on file and available for review.

II. Records/Reports

Generally, records were available upon request, efficiently filed, accurately transcribed, complete and current. Laboratory data from June 2018 was traced through the entire process from generation to final reporting in the EPA's Integrated Compliance Information System (ICIS) and found to be complete and without error.

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III. Facility Site Review, Self-Compliance Program, Operation & Maintenance, and Sanitary Sewer Overflows

Alamo STP is an activated sludge oxidation ditch with extended aeration. The treatment system consists of an oxidation ditch, one final clarifier, and a chlorine contact chamber. Water leaving the chlorine contact chamber is dechlorinated and discharged through Outfall 001. Alamo STP is equipped with emergency backup power to run the system.

Alamo STP has had numerous exceedances of their NPDES permit effluent limits, including: Total Residual Chlorine (TRC), *E. Coli*, Total Suspended Solids (TSS), and Carbonaceous Biochemical Oxygen Demand (CBOD)

The certified operator in direct charge holds WWT3 and the collections operator holds a CS2.

Effluent/Receiving Waters

The final effluent is discharged to an unnamed tributary to Buck Creek at mile 4.5 to the Forked Deer at Mile 118. The outfall location at the receiving stream was not observed during this inspection.

V. Flow Measurement

Influent flows are measured by Parshall flumes with ultrasonic totalizers being the secondary devices. Effluent flows are measured by v-notch weirs with ultrasonic totalizers being the secondary devices. All flow measuring devices are calibrated annually by Labtronix annually.

VI. Laboratory

Laboratory standard operating procedures are followed consistently by laboratory staff. All analytical methods employed in the laboratory are approved in Title 40 CFR Part 136. In-house testing includes the following parameters: pH, dissolved oxygen (DO), TRC, settleable solids, TSS, and *E. coli*. CBOD, Ammonia total as N, Phosphorus total as P, total nitrogen as N, and sludge testing are being subcontracted to Waypoint Analytical. The subcontract laboratory was not evaluated as part of this inspection. All calibration of equipment is performed annually by Labtronix. One area that needs to be brought into compliance in the laboratory was identified:

1. Quality assurance/Quality control (QA/QC) measures need to be added to the performance of E coli testing according to Title 40 CFR Part 136 guidelines.

VII. Sludge Handling/Disposal (or Biosolids Handling/Disposal)

Return activated sludge is sent back to the oxidation ditch from the clarifier. Waste activated sludge is sent to the drying beds and then taken to the Republic landfill in Union City for disposal.

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VIII. Additional Comments and Recommendations

The Division understands that Alamo STP is consulting with the Tennessee Association of Utility Districts to get the Laboratory QA/QC in alignment with Title 40 CFR Part 136 requirements.

Alamo STP has another final clarifier being built on site presently and will be brought into service upon completion. The grit chamber is waiting on a part to be supplied and should be brought back into service within the month. Cameras are due to be deployed on some of the mains in the collections system followed by re-lining where needed to reduce inflow and infiltration. Alamo STP has been very active with smoke testing and relining in the past few years.

IX. Conclusion

Compliance with your NPDES requirements ensure discharges that are protective of downstream fish and aquatic life and water quality. On behalf of the Division, I want to thank you and your staff for your efforts to ensure permit compliance and to protect state water quality. If I may be of assistance in matters concerning this report, please contact me via telephone at (731) 512.1338 or via email at Tammy.Miller@tn.gov.

Sincerely,

Tammy Miller, Environmental Scientist

Copy: Mr. Will Perry, will010274@gmail.com

Jackson Environmental Field Office Division of Water Resources

Waterlog

Danny Miller