



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
JACKSON ENVIRONMENTAL FIELD OFFICE  
DIVISION OF WATER RESOURCES  
1625 HOLLYWOOD DR.  
JACKSON, TN 38305-4316  
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April 26, 2024

Mr. Tony White  
Superintendent  
Dyersburg STP  
P.O. 1358  
Dyersburg, TN 38025

RE: **Pretreatment Compliance Inspection (PCI)**  
City of Dyersburg Wastewater Treatment Plant  
NPDES Tracking No: TN0023477  
Dyer County

Dear Mr. White,

On April 15, 2024, as representatives of the Tennessee Department of Environment and Conservation, Division of Water Resources, Ms. John Bowling and I performed a routine compliance inspection at the above referenced facility to evaluate the City of Dyersburg's compliance with pretreatment program requirements of NPDES Permit TN0023477. The Division thanks you and Mr. Rodney Shelton for your time and assistance. Please see the sections below for details regarding the inspection.

### **I. Permit**

NPDES Permit No. TN0023477 authorizes the City of Dyersburg's Wastewater Treatment Plant to discharge treated municipal wastewater from Outfall 001 into the North Fork Forked Deer River at mile 2.8. The permit was effective on January 23, 2023, and it expires on December 31, 2027.

### **II. File Review**

The City of Dyersburg has six non-categorical and two categorical permitted industries discharging to them. The two categorical industries are ERMCO Mfg. Co. and Rough Country. The other industries are Hexpol, Devely, Former Environmental Waste Solutions, Geon Performance Solutions, Northwest TN Landfill, and Waste Industries of Decatur.

A file review was conducted on industrial users (IUs) ERMCO Mfg. Co. and Hexpol to determine the following:

- i. The individual user permits issued by the Control Authority (CA) met the necessary criteria.

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- ii. The required records, reports, and inspection documents were on file and readily available.
- iii. That the IUs, through examination of the previously mentioned documents, have remained in compliance with the pretreatment program permit limits and self-monitoring requirements set forth by the Control Authority (CA).

During the file review, it was determined that the self-monitoring reports for all industries are being submitted electronically. Self – monitoring reports from the industries to the municipality need to have a wet ink signature per Tennessee rules. This means the reports need to be submitted by mail or dropping off to the city retain the signature as being scanned is considered electronic reporting under 40 CFR Part 3.

All other documentation and records have been well maintained and both IUs reviewed appear to be in compliance at the time of inspection.

### **III. Site Visit**

A site visit was conducted at IUs Hexpol and ERMCO Mfg. Co to gauge pretreatment program effectiveness, compliance, and overall impact. Hexpol is classified as a rubber manufacturer. We met with Mr. Blake Walton and Mr. Dominic Willis, and they provided a thorough walk-through of the production line followed by an observation and description of their pretreatment process. Hexpol's wastewater is generated from stormwater around secondary containment of tanks outside the building. All secondary containment areas are piped to the pretreatment location inside the building. The pretreatment process at Hexpol is two stages. The first stage is a filter stage that filters the water with perlite to help remove contaminants. The second stage is pH adjustment. Hexpol discharges in batches and at the time of the inspection was unable to discharge due to a pump issue. The outfall is in the south part of the building and a sampler is permanently installed at the sampling point for both City of Dyersburg and Hexpol to use when sampling.

ERMCO Mfg. Co is classified as an airport lighting transformer manufacturer with transformers as their primary product. We met with Ms. Angela Robbins, and she provided a thorough walk-through of the production line at the ERMCO Mfg. Co site at 2224 Industrial Road followed by an observation and description of their pretreatment process. ERMCO Mfg. Co has multiple buildings with four of the sites discharging wastewater to the City of Dyersburg. All ERMCO Mfg. Co locations that discharge to the City of Dyersburg are in the same IU permit as they all make transformers, and the pretreatment process is the same for all four locations. Wastewater is generated during the wash stage when the parts to make the transformers go through a 5-stage washer. ERMCO Mfg. Co pretreats the wastewater by adjusting the pH. The sampling location is outside the building at a manhole on the east side of the building. A sampler is placed at the manhole during sampling but is not permanently left there.

No observable deficiencies were noted during the site visits.

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### **IV. Pretreatment**

Please ensure that the self-monitoring reports have a wet ink signature and are kept on file. There were no other issues of concern found with the City of Dyersburg pretreatment program during this compliance inspection. Please continue to maintain accurate records and documentation and submitting necessary reports.

### **V. Conclusion**

Compliance with permit TN0023477 requirements helps ensure discharges that are protective of downstream fish and aquatic life and water quality. Thank you 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 731-676-6604 or via email at Kaylee.Sabo@tn.gov.

Sincerely,



Kaylee Sabo, E.I.

Environmental Protection Specialist

Division of Water Resources

Jackson Environmental Field Office

cc: Johen Bowling, EI, EPS, JEFO, Johen.Bowling@tn.gov  
Tony White, Superintendent, City of Dyersburg STP, twhite@dyersburgtn.gov  
Rodney Shelton, Wastewater Operator, City of Dyersburg, rshelton@dyersburgtn.gov