



**STATE OF TENNESSEE**  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**COOKEVILLE ENVIRONMENTAL FIELD OFFICE**  
DIVISION OF WATER RESOURCES  
1221 SOUTH WILLOW AVENUE  
COOKEVILLE, TN 38506  
STATEWIDE 1-888-891-8332

PHONE 931-520-6688

FAX 931-432-6952

August 29, 2023

The Honorable Jerry Lowery, Mayor  
City of Sparta  
j.lowery@spartatn.gov  
P.O. Box 468  
Sparta, TN 38583

**RE: Pretreatment Technical Assistance Visit (TAV)**  
**City of Sparta, NPDES Number: TN0061166; Permit Expiration: September 30, 2027.**

Dear Mayor Lowery:

The Division of Water Resources staff wishes to thank you for the generous time and courtesy your staff showed during the recent Pretreatment Technical Assist Visit (TAV) conducted by Mr. Oakley Hall on July 27, 2023, at the City of Sparta, Sewer Treatment Facility in White County. The inspection included discussion and an associated file review.

**Program Document Review**

Sparta (the Control Authority) currently has two (2) SIUs that are discharging wastewater for treatment to the sewer treatment plant (STP). Additional industrial connections are not expected in the near future. The Pretreatment Program was discussed at length with Mr. Brandon Young (Chief Operator). Mr. Young has established effective communication with the industrial user contacts (THK – Kel Stott and BASF – Michael Akehinmi). Since wastewater treatment staff are relatively new to the pretreatment regulatory requirements, it is strongly recommended that they attend pretreatment training courses, which should include Voluntary Pretreatment Level One (1) certification. This will help them to better understand and implement the pretreatment program. Mr. Brandon Young should be identified as the Sparta Pretreatment Coordinator.

**Industrial Permit Review**

The two current industrial user permits became effective on December 1, 2021, and will expire on November 30, 2026. Sampling locations are listed in the permit. No violations were noted since the last inspection (PCI). The wastewater treatment facility accepts septage waste from county septic tanks.

Mayor Jerry Lowery  
City of Sparta  
August 29, 2023  
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### **File Review Findings**

Files were reviewed at the City of Sparta STP. The files and logbooks were found to be in good order. The two industrial users are being inspected annually and sampled by the CA semi-annually. Engineering changes to the discharge at the BASF facility continue to be reviewed by site personnel. Benzene at the BASF discharge has been effectively reduced. No violations for the two (2) SIUs were noted.

### **Industrial Users**

#### **BASF**

Records were available for review. The facility manufactures plastic beads (a physical process). There have been no significant changes in the process flow. The facility made some engineering & technology changes with regard to how they move raw materials in the facility. Mr. Young maintains communication with the facility. Last samples collected: February 25, 2023, and June 6, 2023.

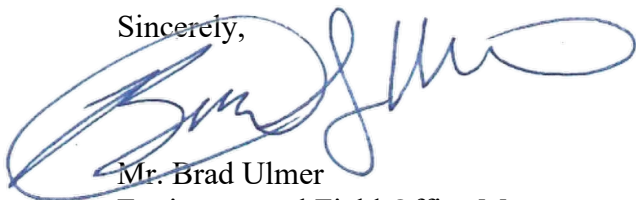
#### **THK Rhythm North America**

Records were available for review. The facility is a CIU (metal finisher). Automotive suspension parts are manufactured and painted. There have been no significant changes in the process flow. The facility has expanded. The expansion has not changed the industrial characteristics of the wastewater discharge as it is the use of machined aluminum and is not painted. Mr. Young maintains communication with the facility. Samples were collected on December 15, 2022, and March 30, 2023, along with a more recent collection that are not yet on file.

The Division of Water Resources would again like to thank you for your staff's time and courtesy during this inspection.

If you have any questions, you may contact Mr. Oakley Hall in Cookeville by way of telephone at (931) 520-6677 or toll free at 1-(888)-891-8332. You may also use electronic mail at: [Oakley.Hall@tn.gov](mailto:Oakley.Hall@tn.gov).

Sincerely,



Mr. Brad Ulmer  
Environmental Field Office Manager  
Division of Water Resources  
Cookeville Environmental Field Office

Enclosure: 7.27.2023 TAV Form by WOH

cc: EFO-CK, White County DWR Files: TN0061166  
Mr. Adam Bonomo, Nashville Central Office, State Pretreatment Coordinator  
Mr. F. Brandon Young, Chief Operator via email, [f.young@spartatn.gov](mailto:f.young@spartatn.gov)

POTW TECHNICAL ASSISTANCE VISITS CHECKLIST

7-27-23  
8:45 AM

TN0061166

Josh  
Rhett



CA NPDES  
Permit  
10/1/2022  
9/30/2027  
EXP.

CA name and address: <i>City of Sparta</i>		Date(s) of TAV <i>7-27-23</i>					
<i>TN0061166 Exp 9-30-27</i>		Period covered by TAV <i>LAST Insp. PCI 8-24-22</i>					
PIRT / DSS incorporated in NPDES permit?			<table border="1"> <tr> <td>Yes</td> <td>No</td> </tr> <tr> <td></td> <td><input checked="" type="checkbox"/></td> </tr> </table>	Yes	No		<input checked="" type="checkbox"/>
Yes	No						
	<input checked="" type="checkbox"/>						
INSPECTOR(S)							
Name	Title / Affiliation	Telephone Number					
<i>William McKay Hall</i>	<i>TDEC Environmental Consultant II</i>	<i>(931) 250-3582</i>					
CA REPRESENTATIVE(S)							
Name	Title / Affiliation	Telephone Number					
<i>Brandon Young</i>	<i>City of Sparta Chief Operator</i>	<i>(931) 738-3290</i>					

\*Identified program contact

## ACRONYM LIST

Acronym	Term
BMR	Baseline Monitoring Report
CA	Control Authority
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U. S. Environmental Protection Agency
ERP	Enforcement Response Plan
FTE	Full - Time Equivalent
FWA	Flow - Weighted Average
gpd	gallons per day
IU	Industrial User ✓
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not applicable
N/D	Not determined
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User ✓
SNC	Significant Noncompliance
TCLP	Toxicity Characteristic Leachate Procedure
TRC	Technical Review Criteria
TTO	Total Toxic Organics
WENDB	Water Enforcement National Data Base

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TECHNICAL ASSISTANCE VISIT EVALUATION COMMENTS

Voluntary pretreatment Level I for Brandon & Josh  
 Planning Inspections in August  
 BASF - self reporting to Brandon (Michael)  
 THK - self reports to Brandon (Kel)  
 Good communication  
 - no recent violation -

BASF - last samples 2-25-2023 & 6/6/2023  
 Benzene continues to be reduced

THK - samples 3-30-2023, 12-15-2022, & recent collection not set on file.

CA - sampled Feb. BASF; THK March  
 sch. sampling in August 2023

COMPLETED BY:	W. Oakley Hall	DATE:	7-27-23
TITLE:	Environmental Consultant II	TELEPHONE:	(931) 250-3582
POTW REPRESENTATIVE:	Brandon Young	DATE:	7-27-23
PROVIDING RESPONSES:	- chief operator -	TELEPHONE:	(931) 738-3290

## WENDB DATA ENTRY WORKSHEET

<b>II. WENDB DATA ENTRY WORKSHEET</b>		
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.		
CA name		
NPDES number		
Date of audit		
	Checklist Reference	Data
• Number of SIUs*	II.B.2.a.	2
• Number of CIUs	II.B.2.a.	1
- Number of SIUs without control mechanism	II.C.1.a.	0
- Number of SIUs not inspected	II.E.2.b.	0
- Number of SIUs not sampled	II.E.2.a.	0
- Number of SIUs in SNC with Pretreatment Standards	II.F.3.	0
- Number of SIUs in SNC with Reporting Requirements	II.F.3.	0
- Number of SIUs in SNC with Pretreatment Schedule	II.F.3.	0
- Number of SIUs in SNC Published in the Newspaper	II.F.4.	0
- SIUs on Schedules	II.F.7.	0
*The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."		
**As defined in 40 CFR 403.8(f)(2)(viii).		

WENDB DATA ENTRY WORKSHEET	DATE: 7-27-23
COMPLETED BY: W. Oakley Hall	TELEPHONE: (931) 250-3582
TITLE: ENVIRONMENT CONSULTANT II	

# RNC WORKSHEET

<b>1. RNC WORKSHEET</b>		
<i>INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.</i>		
CA name	<i>City of Sparta</i>	
NPDES number	<i>TN 0061166</i>	
Date of inspection	<i>7-27-23</i>	Date entered into PCS
		Level
<i>NO</i>	Failure to enforce against pass through and / or interference	I
<i>NO</i>	Failure to submit required reports within 30 days	I
<i>NO</i>	Failure to meet compliance schedule milestone date within 90 days <i>N/A</i>	I
<i>NO</i>	Failure to issue / reissue control mechanisms to 90% of SIUs within 6 months	II
<i>NO</i>	Failure to inspect or sample 80% of SIUs within the last 12 months	II
<i>NO</i>	Failure to enforce pretreatment standards and reporting requirements	II
<i>N/A</i>	Other (specify)	II
<b>SNC</b>		
<i>NO</i>	CA in SNC for violation of any Level I criterion	
<i>NO</i>	CA in SNC for violation of two or more Level II criterion	
<p>For more information on RNC, please refer to EPA's 1990 <u>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</u></p>		

RNC WORKSHEET COMPLETED BY: <i>w. oakley hall</i> TITLE: <i>ENV. Consultant II</i>	DATE: <i>7-27-23</i> TELEPHONE: <i>931-250-3582</i>
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**TAV IU FILE REVIEW**

FILE A Industry name and address  
**BASF**

Type of industry  
**Mechanical Process in manufacturing**

[ ] CIU 40 CFR \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_  
Category(ies) \_\_\_\_\_

Contact name  
**Michael Akshim**

Contact title  
**EHS specialist III**

[] Other SIU [ ] Non SIU

Contact Phone \_\_\_\_\_

Comments  
**S.I.U.**

**CURRENT CONTROL MECHANISM (PERMIT)**

EXPIRATION DATE OF LAST	<b>11-30-21</b>		
PERMIT ISSUE DATE	<b>12-1-2021</b>	PERMIT EXPIRATION DATE	<b>11-30-2026</b>
(< 5 YR DURATION)	<b>yes</b>		
COMMENTS			

**PRETREATMENT STANDARDS VIOLATION HISTORY SINCE LAST INSPECTION**

STANDARD VIOLATED	VIOLATION DATE	
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>		
ENFORCEMENT ACTION	<b>N/A</b>	DATE
SIGNIFICANT NONCOMPLIANCE	<b>NO</b>	CHRONIC TRC

STANDARD VIOLATED	VIOLATION DATE	
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>		
ENFORCEMENT ACTION		DATE
SIGNIFICANT NONCOMPLIANCE	<b>NO</b>	CHRONIC TRC



**TAV IU FILE REVIEW**

FILE <u>B</u> Industry name and address <p align="center" style="font-size: 1.2em;"><i>THK Rhythm</i></p>	Type of industry <i>Manufactures</i> <i>Automotive suspension</i> <i>Parts</i>				
<input checked="" type="checkbox"/> CIU 40 CFR <u>433</u> , _____, _____  Category(ies) _____  <input type="checkbox"/> Other SIU <input type="checkbox"/> Non SIU	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">Contact name <i>Mr. Kel Stott</i></td> <td style="width:50%;">Contact title <i>Environmental Manager</i></td> </tr> <tr> <td colspan="2">Contact Phone <i>(931) 738-2250</i></td> </tr> </table>	Contact name <i>Mr. Kel Stott</i>	Contact title <i>Environmental Manager</i>	Contact Phone <i>(931) 738-2250</i>	
Contact name <i>Mr. Kel Stott</i>	Contact title <i>Environmental Manager</i>				
Contact Phone <i>(931) 738-2250</i>					

Comments *NEW source Metal Finisher*

**CURRENT CONTROL MECHANISM (PERMIT)**

EXPIRATION DATE OF LAST	<i>11-30-2021</i>		
PERMIT ISSUE DATE	<i>12-1-2021</i>	PERMIT EXPIRATION DATE	<i>11-30-2026</i>
(< 5 YR DURATION)	<i>yes</i>		
COMMENTS			

**PRETREATMENT STANDARDS VIOLATION HISTORY SINCE LAST INSPECTION**

<b>STANDARD VIOLATED</b>	<i>N/A</i>	<b>VIOLATION DATE</b>	
<i>(VIOLATION TYPES: REPORTING, PERMIT LIMITS, SAMPLING, NOTIFICATION, RECORDS)</i>			
<b>ENFORCEMENT ACTION</b>		<b>DATE</b>	
<b>SIGNIFICANT NONCOMPLIANCE</b>	<i>NO</i>	<b>CHRONIC</b>	<b>TRC</b>

<b>STANDARD VIOLATED</b>		<b>VIOLATION DATE</b>	
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<b>ENFORCEMENT ACTION</b>		<b>DATE</b>	
<b>SIGNIFICANT NONCOMPLIANCE</b>	NO	<b>CHRONIC</b>	<b>TRC</b>