




STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

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MEMORANDUM

To: Mrs. Jessica Murphy, Unit Manager, TDEC Division of Water Resources
e-copy: Jessica.Murphy@tn.gov

From: Vojin Janjić, Manager, Water-Based Systems, Division of Water Resources
e-sig: 

Date August 15, 2017

Re: CAP ER Review Comments
City of Mckenzie, Carroll County
Wastewater Project Number 17.0406
Project: Consent Order #WPC16-0051
NPDES # TN0020613

We have reviewed the report titled, *Correction Action Plan, Engineering Report for the City of McKenzie, Tennessee June 2017, Prepared by GRW Engineers, Inc.*, received on June 13, 2017, in consideration of permit requirements and operability and maintainability and have comments concerning the project.

The report addresses problems identified in the Consent Order, presents modifications made at the treatment plant and in the collection system and recommends the following improvements:

- Replace the pumps and controls in the treatment plant's lab lift station.
- Replace the influent and effluent samplers.
- Repair and or replace the air conditioner, duct work, and controls in the lab building.
- Repair and paint lab building interior.
- Replace several exterior windows in the lab building.
- Replace the two digester blowers.
- Data collection and flow meter study at the collection system.
- Smoke test, televise and rehabilitate sewer lines and manholes.
- Repairs on lift stations as listed in Consent Order.

With a combination of funding from the Community Development Block Grant (CDBG) and Rural Development (RD), the CAP/ER design phase will begin in October 2018 and construction will begin around March 2019 and completed in approximately 12 months.

The CAP/ER does not appear to supply the detail required of the Order And Assessment, Section XXIV, Paragraph 1. Specifically it does not supply start and end dates and milestones for activities prescribed to bring the treatment plant into permit compliance with the NPDES permit. These start and end dates and milestones were to become enforceable as part of the order. Additionally, the CAP/ER does not include an evaluation of the effectiveness of the nutrient optimization effort at the treatment plant. And it does not detail the evaluation the

pump stations to determine if they are operating as designed. Rather, it just indicates that some will be replaced or repaired without any delineation of a replacement/repair schedule.

The CAP/ER supplies start and end dates and milestones for CDBG and RD funding. The CAP/ER neither identifies any causative factor for the continued effluent violations nor details how the proposed improvements at the WWTP are expected to address/correct them. Identification of the factors causing the operational problems at the treatment facility, evaluation of alternatives to address them, and development of a schedule of milestone activities to address them is a separate scope of work from securing funding.

To expedite matters, please reference the assigned wastewater project number 17-0406 on any future correspondence. If we may be of any assistance, please feel free to contact Ms. Maybelle Sparks at (615) 532-0625 or by E-mail at maybelle.sparks@tn.gov.

cc: Water-Based Systems File