



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Water Resources**

Nashville Environmental Field Office
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June 20, 2022

Roger Goodson, General Manager
Ecopy: rgoodson@ cudrc.com
Consolidated Utility District of Rutherford County
P.O. Box 249
Murfreesboro TN, 37133

RE: Compliance Evaluation Inspections

CUDRC, Clearview Acres
Permit #SOP-16018, and
CUDRC, Rachel's Place
Permit #SOP-05075, and
CUDRC, Pinnacle Hills
Permit #SOP-06019
Rutherford County

Dear Mr. Goodson,

On Tuesday May 31, 2022, Mr. Jordan Fey and I performed a Compliance Evaluation Inspection on the treatment facilities Clearview Acres for compliance with State Permit SOP-16018, which became effective on September 10, 2021, and expires on August 31, 2026. I also inspected the treatment facilities for the Rachel's Place subdivision, operating under State Permit SOP-05075 which became effective on March 1, 2022, and will expire on February 28, 2027. I also inspected the treatment facilities for the Pinnacle Hills subdivision, operating under State Permit SOP-06019 which became effective on May 6, 2022, and will expire on September 30, 2026.

We met with Mr. Mark Wood and Mr. Joe Fisher during the inspection. I would like to thank Mr. Wood and Mr. Fisher for their time and courtesy shown while on site.

Permit and Records Review

Records are maintained at Consolidated Utility District of Rutherford County's (CUDRC) main office. Copies of quarterly reports and lab data were provided via e-mail before the inspection date. No effluent violations were observed for either facility, and sampling is occurring at the required frequencies for each parameter. Quarterly reports were compared to the files on record

with the Division of Water Resources, and I found no discrepancies. Reports are submitted on time. During review of the analytical reports and quarterly reports, it was noted that 0.01 was used as a value on the quarterly report when there was a ND on the analytical report. Moving forward, please reference the 40 CFR 136 and use Below Detection Limit (BDL) or the Method Detection Limit (MDL) for the test procedure and remain consistent.

Site Review

Mr. Wood indicated that all three facilities are being visited weekly, which meets the O&M schedule which has been submitted to and approved by the Division. The grounds around the filter tanks are sufficiently vegetated with no woody growths, and there were no observable indications of leaks. At Rachel's Place and Pinnacle Hills small divots were visible in the gravel bed above the filters from gravel funneling into the dome below. Clearview Acres is a newer site, and no divots were visible. Mr. Wood and Mr. Fisher were aware of the issue and are investigating available options to remedy this and prevent it in future instillations. I observed pumps and wet wells at all three facilities. There were no signs of corrosion or other problems. Effluent passes through UV and was clear and free of solids and odors.

I observed each drip field for wet or greasy spots and noticed none. All fields are properly signed and fenced, and each one has reserve capacity.

Conclusions

All three facilities are well-maintained and operated, providing a sufficiently clean effluent to the drip fields for final disposal.

Action Items and Recommendations

I would like to thank Mr. Wood and Mr. Fisher again for their courtesy and cooperation shown during these inspections. No corrective actions are required at this time. Moving forward follow the 40 CFR 136 reporting requirements for BDL and remain consistent. If you have any questions or concerns, please contact me at 615-961-3875 or christina.wingett@tn.gov.

Sincerely,



Christina Wingett
Environmental Scientist
Division of Water Resources

e-copy: Joe Fisher, Wastewater Foreman, jfisher@ cudrc.com
