

July 10, 2015

Ms. Maybelle Sparks
Tennessee Department of Environment & Conservation
Division of Water Resources
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, TN 37243

Subject: Draft NPDES Permit TN0059366 (Lick Creek Valley WWTP)

Dear Ms. Sparks,

The Tennessee Clean Water Network submits these comments in response to the public notice regarding the draft NPDES permit for the Lick Creek Valley WWTP (TN0059366). We appreciate the opportunity to provide these comments for your consideration and look forward to hearing from the Division.

1. The plant should be required to optimize.

Optimization is a significant component of the Division's Nutrient Reduction Framework and to date has been incorporate in several NPDES permits. The Framework states "The Division strongly encourages that, if applicable, plant optimization be included as one of the first alternatives in the plant's nutrient removal/reduction plan."¹

The draft permit contains one reference to optimization.⁶ However, contrary to most draft permits incorporating plant optimization, there is no nutrient reduction plan included nor any other references to plant optimization. TCWN would like to know if plant optimization is a requirement in this NPDES permit. If not, we request it be added along with a compliance schedule for completing the optimization.

¹ TDEC, Division of Water Resources. *Tennessee Nutrient Reduction Framework*. Page 26. January 2015 (draft).

⁶ TDEC, Division of Water Resources. NPDES Permit TN0059366 (draft). Page 33. June 2015: The permittee shall develop and implement a biological monitoring plan to define the biological impact of its discharge on the receiving stream after optimization.

2. Post-optimization limits must be included in this permit for Outfall 001.

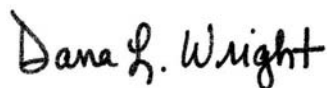
According to the Division's most recent data, the receiving stream, Lick Creek, is impaired by total phosphorus (TP).⁷ Once the optimization is complete the plant should comply with the post-optimization effluent limit equivalent to or less than 1.0 mg/L TP. The post-optimization effluent limits have frequently been applied in other permits.⁸ In an effort to be consistent and properly implement the Nutrient Reduction Framework, TP post-optimization limits are appropriate.

3. The performance-based total phosphorus limit should apply year round prior to optimization.

As noted above, Lick Creek is impaired by TP. The limits applicable to Outfall 001 include total nitrogen (TN) and TP limits for the summer, but only a TN limit for the winter.¹⁴ The TP limit must also be applied in the winter to prevent further degradation to Lick Cree.

We appreciate the opportunity to comment on this draft permit and the Division's consideration of these concerns. Please send the final permit and response to comments to dana@tcwn.org.

Sincerely,



Dana Wright
Water Policy Director

⁷ TDEC, Division of Water Resources. *Year 2014 303(d) List (draft)*. July 2014.

⁸ See TN0059404 (White House STP), TN0064424 (Oneida STP), TN21717 (Dresden-Printing Factory Lagoon), TN0062286 (Dresden Lagoon), TN0024791 (Claiborne Utility District STP), TN0025127 (City of Rocky Top STP), TN0064149 (Luttrell STP).

¹⁴ TN0059366 (draft). Pages 7-8. June 2015.