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April 20, 2016

Mr. Jim McAdoo
Tennessee Department of Environment & Conservation
Division of Water Resources
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243

Subject: Draft NPDES Permit TN0025437 (Harriman STP)

Dear Mr. McAdoo,

The Tennessee Clean Water Network (TCWN) is submitting the following comments in response to the public notice regarding the proposed NPDES permit renewal for the Harriman STP (TN0025437). We appreciate the opportunity to provide these comments for your consideration and look forward to hearing from the Division.

The receiving waterbody, the Tennessee River, is not assessed as nutrient impaired. However, nutrient monitoring and reporting is essential to continued efforts to evaluate nutrient levels statewide. TCWN has worked closely with the Division over the past few years in the development of the Nutrient Reduction Framework, and been told often about the need for more data. Failing to include a requirement for total phosphorus and total nitrogen monitoring seems contradictory to this need, as well as towards progress in developing an accurate and effective nutrient TMDL for this watershed.

Nutrient monitoring is also an important component of the Hypoxia Task Force work. In other individual permits the Division has included the following language, and TCWN requests it be included in this one as well:

For major NPDES permits (design flows > 1.0 MGD) EPA recommends continued monitoring for total nitrogen (TN) and total phosphorus (TP) in order to have current nutrient data maintained in its Integrated Compliance Information System (ICIS) database to accurately forecast nutrient loading to the Mississippi River. This ICIS data is being used by the Mississippi Hypoxia Task Force which consists of the EPA and States along the Mississippi River. Tennessee is one of three states in Region 4 which has rivers that ultimately drain to the Mississippi River.

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