



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

ELECTRONIC EMAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Ms. Jo Anna McMahon, Director Environmental Health and Safety
Central State Water Resources
1630 Des Peres Rd., Suite 140
St. Louis, Missouri 63131
env.comp@cswrgroup.com

Re: Reconnaissance Inspection Report (RI)
NPDES Permit No. MS0053180
Great River Utility Operating Company, LLC, Mobile Home Park

Dear Ms. McMahon:

The U.S. Environmental Protection Agency, Region 4, conducted a Reconnaissance Inspection of the Great River Utility Operating Company, LLC, Mobile Home Park located at South Montgomery Street, Starkville, Mississippi on June 7, 2022, for compliance with its National Pollutant Discharge Elimination System permit and the Clean Water Act.

The inspection findings are provided in the enclosed Reconnaissance Inspection Report. If you have any questions concerning the inspection report, please contact Tristan Odekirk at 404-562-9295 or via email at Odekirk.Tristan@epa.gov.

Sincerely,

Castillo, Jairo

Digitally signed by Castillo,
Jairo
Date: 2022.07.14 08:19:08
-04'00'

Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Enclosure

cc: Ms. Michelle Clark
Mississippi Department of Environmental Quality

Michael Dick



United States Environmental Protection Agency
Region 4
CV-MS-0053180-6-7-2022
Reconnaissance Inspection Report

SECTION A: National Data System Coding

NPDES No.	MO/DAY/YR	Inspection-Type	Inspector	Facility-Type
MS0053180	6/7/2022	ROS (Reconnaissance without Sampling)	Tristan Odekirk/Richard Elliott	Publicly owned treatment works

SECTION B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Montgomery Quarters LLC, Mobile Home Park South Montgomery Street, Starkville, Mississippi 39759	Entry Date/Time 6/7/2022 10:50 AM Exit Date/Time 6/7/2022 11:30 AM	Permit Effective Date 6/13/2017 Permit Expiration Date 5/31/2022
Names of On-site Representative(s)/Title(s)/Phone and Fax Number(s) On-site representatives are listed in Section D Ross Williams, Operator, 662-574-9634 Michael Dick, Central States Water Resources, 217-741-8746	Other Facility Data n/a	
Name, Address of Responsible Official/Title/Phone and Fax Number Wayne Tubb, 662-242-0306	Contacted ☒ Yes ☐ No	

SECTION C: Areas Evaluated During Inspection (Check only those areas evaluated)

☒ Permit	☐ Flow Measurement	☐ Operation & Maintenance	☐ CSO/SSO (Sewer Overflow)
☒ Records/Reports	☐ Self-Monitoring Program	☐ Sludge Handling/Disposal	☐ Pollution Prevention
☒ Facility Site Review	☐ Compliance Schedules	☐ Pretreatment	☐ Multimedia
☐ Effluent/Receiving Waters	☐ Laboratory	☐ Storm Water	☐ Other:

SECTION D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

Attached below.

Name(s) and Signature(s) of Inspector(s) TRISTAN ODEKIRK Tristan Odekirk Digitally signed by TRISTAN ODEKIRK Date: 2022.07.14 08:52:08 -04'00'	Agency/Division/Phone and Fax Number EPA/ECAD/(404) 562-9295	Date 7/14/2022
Signature of Management QA Reviewer Castillo, Jairo Jairo Castillo Digitally signed by Castillo, Jairo Date: 2022.07.14 08:18:58 -04'00'	Agency/Division/Phone and Fax Number EPA/ECAD/(404) 562-9257	Date 7/14/2022



United States Environmental Protection Agency
Region 4
CV-MS-0053180-6-7-2022
Reconnaissance Inspection Report
(Continued)

Section D: Summary of Findings / Comments

On June 7, 2022, the U.S. Environmental Protection Agency, Region 4, conducted a Reconnaissance Inspection (RI) of the Montgomery Quarters LLC, Mobile Home Park wastewater treatment lagoon (the “facility”) located on Token Road in the Montgomery Quarters mobile home park off of South Montgomery Street in Starkville, MS. The Facility is owned and operated by Central States Water Resources Inc. The Wastewater Treatment Plant (WWTP) is operated by a contract operator. Mr. Ross Williams, who is employed by Midwest Water Operations, is the operator of record. The inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. This report and attachments present the results of the inspection.

I. FACILITY DESCRIPTION

The Facility is a single-cell wastewater treatment lagoon that treats domestic wastewater from the Montgomery Quarters mobile home park and the adjacent Stone Ridge Subdivision. Wastewater flows by gravity to a main pump station before entering the lagoon. According to the operator, effluent from the lagoon exits the lagoon through a weir that can be used for flow measurement. The lagoon exit structure did not allow for visual inspection or flow measurement. A bucket method was used by the operator to determine flow. Disinfection is achieved using a chlorine tablet dispenser and dechlorination by using Sodium Sulfite tablets. Effluent from the lagoon should flow through an outlet pipe however, the pipe has been damaged and no longer serves to convey flows to the receiving waterbody. Effluent flows over land and creates channels of erosion leading the receiving stream. The operator stated that he would be repairing the effluent discharge piping in the near future.

II. INSPECTION PROCEDURES

The objective of this RI was to evaluate the condition of the Facility’s aerated lagoon and the permittee’s self-monitoring program and offer compliance assistance as needed. Specific tasks included conducting an opening conference, interviewing Facility staff, conducting a site visit to the lagoon and the receiving waters, and a closing conference.

III. COMPLIANCE HISTORY

The EPA reviewed its Enforcement and Compliance History Online (ECHO) on June 27, 2022. Past violations included failure to report discharge monitoring reports (DMRs) for 8 quarters and effluent violations for 5-day biochemical oxygen demand, total residual chlorine, E. Coli, nitrogen as ammonia, and total suspended solids for October-December 2020. When asked about the effluent violations, the operator claimed that the facility had just been bought by the Central States Water Resources group for maintenance and operations and thus the operator did not know what previous operators and owners had done. The managing company is currently under compliance agreement with the state of Mississippi to return all owned facilities to compliance. Under the agreement, the new owners have begun sampling the facility to characterize the wastewater.

IV. PERMIT

The permit was issued June 13, 2017, and expired May 31, 2022. The permittee submitted a permit renewal application on May 13, 2022, which changed the official name of the facility to “Mobile Home Park”. The Facility is permitted to discharge from one outfall to Skinner Creek, a tributary of Hollis Creek. DMRs are due annually by the 28th of January of the following year.

V. FLOW MEASUREMENT

The operator stated that there is a weir in the chlorination chamber. The inside of the chlorination chamber was not accessible. The only reliable and feasible flow measurement method for the Facility was bucket and stopwatch method. Effluent from the lagoon should flow through an outlet pipe, however, the pipe has been damaged and no longer serves to convey flows to the receiving waterbody (Figures 1 and 2). Effluent flows over land and creates channels of erosion leading the receiving stream.

VI. SAMPLING REVIEW

Annual sampling required in the NPDES permit is conducted by Curtis Labs, located in Denham Springs, Louisiana. Samples are collected by the operator and sent to the commercial laboratory. Monthly sampling is conducted by the operator. The commercial laboratory was not reviewed.

VII. EFFLUENT AND RECEIVING WATERS

No sheen or foam were observed in the receiving waters. However, the effluent conveyance piping needs repair and the installation of a proper flow measurement device is needed.

VIII. ATTACHMENTS



Figure 1. Effluent discharging directly from the chlorination chamber and not through pipe to permitted discharge point.



Figure 2. Disassembled effluent pipe shown below the trees. A ditch in the foreground was made by erosion as effluent discharges from a higher point.

END OF REPORT