



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

ELECTRONIC EMAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Mr. Jeremy Spires
Manager, Environmental Compliance
140 BNA Park Drive, Suite 520
Nashville, Tennessee 37214
Email: jeremy.spires@flynashville.com

Re: Reconnaissance Inspection Report, NPDES Permit No. TN0064041
Metro Nashville Airport Authority, Nashville International Airport

Dear Mr. Spires:

The U.S. Environmental Protection Agency, Region 4 and the Tennessee Department of Environment and Conservation conducted an inspection of the Nashville International Airport's deicing fluid and stormwater runoff treatment system located at One Terminal Drive, Nashville, Tennessee on October 26, 2021. The objective of the inspection was to assess the Metro Nashville Airport Authority's compliance with the National Pollutant Discharge Elimination System (NPDES) Permit and the Clean Water Act and to evaluate the general condition of the facility. The inspection results have been summarized in the enclosed Reconnaissance Inspection Report.

If you have any questions about the inspection report, please contact Dennis Sayre at 404-562-9756 or via email at Sayre.Dennis@epa.gov. Please verify receipt of this letter and attachments to Mr. Sayre.

Sincerely,

JAIRO
CASTILLO

Digitally signed by JAIRO
CASTILLO
Date: 2021.12.16
09:17:56 -05'00'

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

Enclosure

cc Jessica Murphy
Tennessee Department of Conservation and the Environment



United States Environmental Protection Agency
Region 4
CV-TN0064041-102621

Reconnaissance Inspection Report

SECTION A: National Data System Coding

NPDES No.	MO/DAY/YR	Inspection-Type	Inspector	Facility-Type
TN0064041	10/26/2021	ROS (Reconnaissance without Sampling)	Dennis Sayre/Tristan Odekirk	Industrial wastewater facility

SECTION B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Nashville International Airport One Terminal Drive, Nashville, Tennessee	Entry Date/Time 10/26/2021 9:00 AM Exit Date/Time 10/26/2021 10:45 AM	Permit Effective Date 10/1/2020 Permit Expiration Date 7/31/2025
Names of On-site Representative(s)/Title(s)/Phone and Fax Number(s) On-site representatives are listed in Section D	Other Facility Data n/a	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Jeremy Spires, Manager, Environmental Compliance 140 BNA Park Drive, Suite 520 Nashville, Tennessee 37214 Email: jeremy.spires@flynnashville.com 615 275-1444	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) DENNIS SAYRE Dennis Sayre Digitally signed by DENNIS SAYRE Date: 2021.12.16 09:26:25 -05'00'	Agency/Division/Phone and Fax Number EPA/ECAD/(404) 562-9756	Date 12/16/2021
Signature of Management QA Reviewer JAIRO CASTILLO Jairo Castillo, P.E. Digitally signed by JAIRO CASTILLO Date: 2021.12.16 09:18:24 -05'00'	Agency/Division/Phone and Fax Number EPA/ECAD/(404) 562-9257	Date 12/16/2021



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-TN0064041-102621

Section D: Summary of Findings / Comments

On October 26, 2021, the U.S. Environmental Protection Agency, Region 4 and the Tennessee Department of Environment and Conservation (TDEC) conducted a Reconnaissance Inspection (RI) on the Nashville International Airport deicing and storm water treatment system (the “Facility”) located on One Terminal Drive, Nashville, Tennessee. The Facility is owned and operated by the Nashville Metro Airport Authority (NMAA). The inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. This report presents the results of the inspection.

I. PARTICIPANTS

Dennis Sayre	EPA Region 4	Sayre.Dennis@epa.gov
Tristan Odekirk	EPA Region 4	Odekirk.Tristan@epa.gov
Jordan Fey	TDEC	Jordan.Fey@tn.gov
Christina Cagle	TDEC	Christina.Cagle@tn.gov
Jenny Strobel	TDEC	Jenny.Strobel@tn.gov
Ted Morrissey	MNAA	Ted.Morrissey@flynashville.com
Jeremy Spires	MNAA	Jeremy.Spires@flynashville.com
Brandin Price	MNAA	Brandin.Price@flynashville.com

II. FACILITY DESCRIPTION

The Facility is an industrial aerated lagoon treatment system that is designed to treat storm water runoff from various locations that are contaminated with glycol based deicing fluids and storm water runoff from the airport fuel farm area. Refer to the Facility flow diagram shown in Figure 1 for storm water collection areas and treatment units.

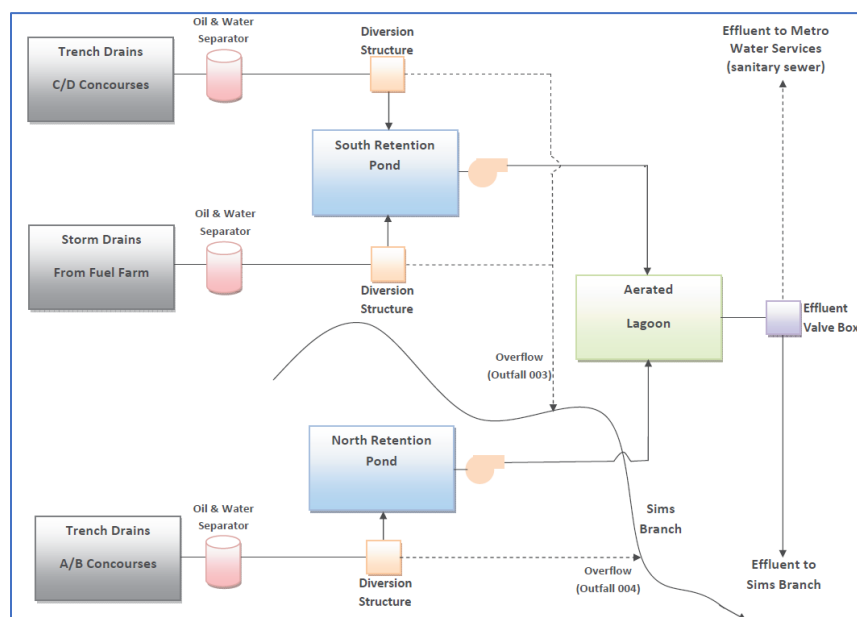


Figure 1. Facility flow diagram.



Reconnaissance Inspection Report

Project No. CV-TN0064041-102621

III. INSPECTION PROCEDURES

The objective of this RI was to evaluate the condition of the Facility's aerated lagoon system and the permittee's self-monitoring program. Specific tasks included conducting an opening conference, interviewing Facility staff, reviewing Discharge Monitoring Reports (DMRs) and other records, conducting a site visit to the lagoon and the receiving waters, and conducting a closing conference. This inspection focused only on Outfall 002 and the aerated lagoon system for the purposes of the site visit.

IV. PERMIT

The Facility is permitted to discharge through various outfalls shown in Figure 2. All outfalls shown in Figure 2 are included in NMAA's National Pollutant Discharge Elimination System (NPDES) Permit, which became effective on October 1, 2020. Outfall 002 is used to discharge treated storm water that is contaminated with deicing fluid and from the airport fuel farm that is transmitted to the aerated lagoon during the deicing season. The NPDES Permit defines the deicing season as any month, October through April, in which deicing material is applied at Nashville International Airport at least once during that month. The lagoon is placed in lay-up generally from May 1 through November 1. Outfalls 003 and 004 are used to discharge storm water from the oil-water separators during periods where deicing operations are not conducted. Storm water discharging from Outfalls SW1 through SW7 do not enter the Facility for treatment.

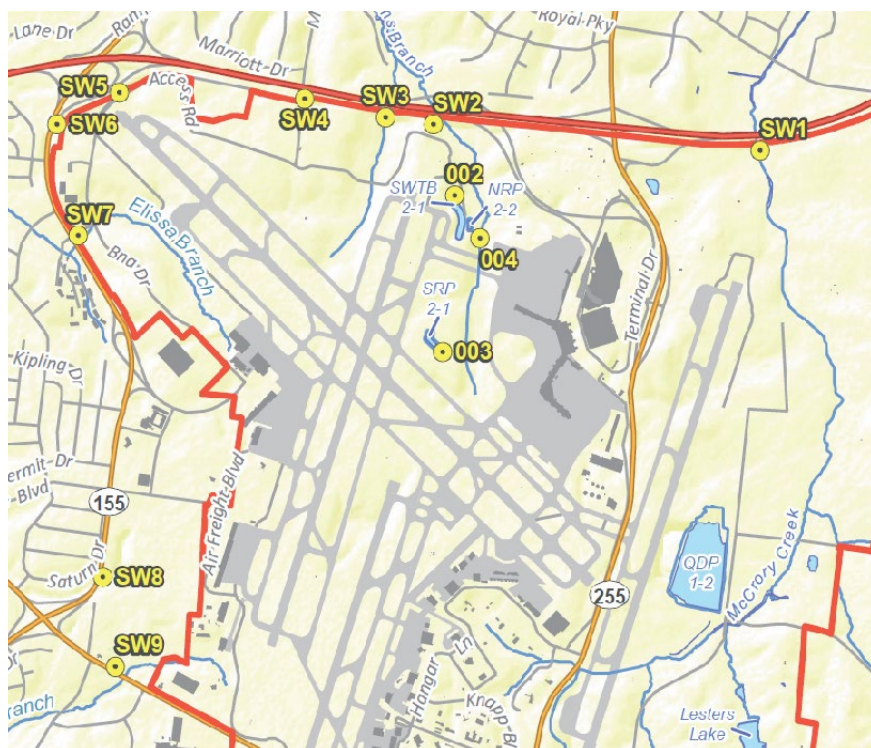


Figure 2. Outfall location map.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-TN0064041-102621

The NPDES Permit stipulates that all outfalls be monitored throughout the entire year.

V. RECORDS AND REPORTS

Attachment 2 shows NMAA's three-year compliance history as recorded in EPA's Integrated Compliance Information System (ICIS). ICIS records show that since February 2019, MNAA has submitted their Discharge Monitoring Report (DMR) either past the due date and/or failed to collect or analyze samples. ICIS records also show that MNAA exceeded effluent limits for Ammonia (as Nitrogen), Carbonaceous Biochemical Oxygen Demand (5 day), Total Suspended Solids, and pH as shown in Attachment 2.

TDEC issued Notices of Violation (informal enforcement actions) on 06/13/2019, 02/31/2020, and 07/06/2021. No formal enforcement action is recorded for the past five years.

VI. OPERATIONS AND MAINTENANCE

(Refer to Attachment 1 – Photographs for photo citations)

SITE VISIT OBSERVATIONS

- The site visit during the inspection only included the Aerated Lagoon area of the system and Outfall 002, as shown in Figure 2.



Figure 2. Overhead view of the Aeration Lagoon area.

- The Clarifier and the north end of the lagoon was empty and appeared to be in good condition. The Facility was still in lay-up at the time of inspection and was scheduled to be



Reconnaissance Inspection Report
Project No. CV-TN0064041-102621

on-line starting November 1, 2021. The south end of the pond is full and in start-up operations (Photos 1, 2 and 3).

- Flow is measured from a Parshall flume located next to the Clarifier. The Clarifier was still in lay-up condition and therefore no flow was present in the flume (Photo 4).
- Flow is conveyed to Outfall 002 from the Clarifier in an open channel concrete conveyance ditch. The water present in the conveyance ditch is storm water or ground water seepage originating from the PVC pipe (Photos 5 and 6).
- Outfall 002 has a sign posted at the outfall to Sims Branch creek as required by the NPDES Permit (Photo 7).
- The conveyance ditch ends approximately 20 to 25 feet from the creek. The section of the conveyance ditch, where water pools at the termination of the concrete ditch, has been used for collecting samples for Outfall 002 discharges. Dirt and other solids were accumulated at this location (Photo 8).

VII. EFFLUENT AND RECEIVING WATERS

The Facility was not discharging from the Clarifier during the inspection. The storm water that was present in the conveyance ditch, shown in Photo 5, was clear and the flow was negligible. The creek water at Outfall 002 was clear.

VII. DISCUSSION

MNAA's NPDES Permit states in Section B.1 (Representative Sampling) that "Samples and measurements taken in compliance with the monitoring requirements specified herein shall be representative of the volume and nature of the monitored discharge and shall be taken after treatment and prior to mixing with uncontaminated storm water runoff or the receiving stream. Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges."

NPDES Permit Section A stipulates that samples are to be collected for "External Outfall 002, Effluent Gross, All Year."

NMAA's representative stated that effluent samples are taken at the end of the concrete conveyance ditch for Outfall 002. Flow from the Clarifier is measured at the Parshall flume located next to the Clarifier. Samples collected at the stated sampling point are not representative of the discharge from the Clarifier because the open conveyance ditch allows for the introduction of storm water runoff prior to the flow entering the creek. Since the NPDES Permit requires year around monitoring of each outfall, NMAA should be sampling discharges from the location marked as Outfall 002, including any storm water discharge, regardless whether the treatment system is in lay-up, if a discharge is present.

A more appropriate location for Outfall 002 would be just after the flow leaves the Parshall flume. If Outfall 002 were located after the flume, samples would be representative of discharges from the



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-TN0064041-102621

treatment system and free from impacts of storm water runoff in the conveyance ditch. Also, any flow reported on the DMR as “no discharge” would be accurate.

VIII. ATTACHMENTS

1. Photographs
2. Three-year Compliance History

End of Report

Attachment 1 – Photographs
Nashville International Airport
Project No. CV-TN0064041-102621



Photo 1. Aerated Lagoon, north section.



Photo 2. Aerated Lagoon, south section.



Photo 3. Clarifier tank.



Photo 4. Parshall flume.



Photo 5. Open channel ditch from the Clarifier (in the background) to Sims Creek/Outfall 002.



Photo 6. Open channel ditch to Outfall 002.



Photo 7. Outfall 002 at Sims Creek.



Photo 8. The end of the open channel ditch and sampling location for Outfall 002.

Project No. CV-TN0064041-102621

Violation Type	Outfall	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Violation cause
DMR Non-Receipt Violation	002	G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:2 C2	D90	2/28/2019	N-04/15/2019	2-04/26/2019	Insufficient flow for sampling
DMR Non-Receipt Violation	002	G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:2 C3	D90	2/28/2019	K-04/15/2019	2-04/26/2019	Insufficient flow for sampling
DMR Non-Receipt Violation	004	G 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	7/31/2019	K-09/15/2019	0-09/15/2021	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 00340 Oxygen demand, chem. [high level] [COD] Effluent Gross Season ID:0 C3	D80	8/31/2019	K-10/16/2019	0-10/16/2021	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 00400 pH Effluent Gross Season ID:0 C3	D80	8/31/2019	K-10/16/2019	0-10/16/2021	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D80	8/31/2019	K-10/16/2019	0-10/16/2021	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 00556 Oil & Grease Effluent Gross Season ID:0 C3	D80	8/31/2019	K-10/16/2019	0-10/16/2021	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 80082 BOD, carbonaceous [5 day, 20 C] Effluent Gross Season ID:0 C3	D80	8/31/2019	K-10/16/2019	0-10/16/2021	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	002	G 00061 stream flow, instantaneous Instream Monitoring Season ID:0 Q1	D80	11/30/2019	N-01/15/2020	1-01/15/2020	Sample equipment Failure
DMR Non-Receipt Violation	002	G 00061 stream flow, instantaneous Instream Monitoring Season ID:0 Q2	D80	11/30/2019	K-01/15/2020	1-01/15/2020	Sample equipment Failure
DMR Non-Receipt Violation	004	G 00400 pH Effluent Gross Season ID:0 C3	D80	11/30/2019	K-01/15/2020	1-01/15/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 00340 Oxygen demand, chem. [high level] [COD] Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 00400 pH Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 00556 Oil & Grease Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	004	G 80082 BOD, carbonaceous [5 day, 20 C] Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW1	B 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW1	B 00340 Oxygen demand, chem. [high level] [COD] Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW1	B 00400 pH Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW1	B 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW1	B 00556 Oil & Grease Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW1	B 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW2	B 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW2	B 00340 Oxygen demand, chem. [high level] [COD] Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW2	B 00400 pH Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW2	B 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW2	B 00556 Oil & Grease Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW2	B 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW7	B 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW7	B 00340 Oxygen demand, chem. [high level] [COD] Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW7	B 00400 pH Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW7	B 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW7	B 00556 Oil & Grease Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	SW7	B 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	12/31/2019	K-02/15/2020	6-03/31/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	002	G 00061 stream flow, instantaneous Instream Monitoring Season ID:0 Q1	D80	2/29/2020	N-04/15/2020	1-04/15/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	002	G 00061 stream flow, instantaneous Instream Monitoring Season ID:0 Q2	D80	2/29/2020	K-04/15/2020	1-04/15/2020	Failed to Sample/Required Analysis Not Conducted
DMR Non-Receipt Violation	002	G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:2 C2	D90	2/29/2020	N-04/15/2020	2-05/26/2020	Conditional Monitoring - Not Required This Period
DMR Non-Receipt Violation	002	G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:2 C3	D90	2/29/2020	K-04/15/2020	2-05/26/2020	Conditional Monitoring - Not Required This Period
DMR Non-Receipt Violation	002	G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:2 C2	D90	2/29/2020	N-04/15/2020	2-05/26/2020	

DMR Non-Receipt Violation	'002 G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:1 C3	D90	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'002 G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:1 C2	D90	7/31/2020	N-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'002 G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:1 C3	D90	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'002 G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:1 C2	D80	7/31/2020	N-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'002 G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:1 C3	D80	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'002 G TAA3B LC50 Static 48Hr Acute Ceriodaphnia Effluent Gross Season ID:0 C1	D90	7/31/2020			No discharge
DMR Non-Receipt Violation	002 G TAA6C LC50 Static 48Hr Acute Pimephales Effluent Gross Season ID:0 C1	D90	7/31/2020			No discharge
DMR Non-Receipt Violation	004 G 00340 Oxygen demand, chem. [high level] [COD] Effluent Gross Season ID:0 C3	D80	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'004 G 00400 pH Effluent Gross Season ID:0 C3	D80	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'004 G 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D80	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'004 G 00556 Oil & Grease Effluent Gross Season ID:0 C3	D80	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'004 G 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	'004 G 80082 BOD, carbonaceous [5 day, 20 C] Effluent Gross Season ID:0 C3	D80	7/31/2020	K-09/15/2020	2-09/23/2020	No discharge
DMR Non-Receipt Violation	003A G 52290 Total Petroleum Hydrocarbons - Diesel Internal Monitoring Point Season ID:0 C1	D80	10/31/2020	K-12/16/2020	1-12/16/2020	Failed to Sample/Required Analysis Not Conducted
Effluent Violation	'002 G 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C2	E90	2/28/2019	T-03/31/2019	2-08/31/2019	
Effluent Violation	'002 G 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C3	E90	2/28/2019			
Effluent Violation	'002 G 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C2	E90	3/31/2019	T-03/31/2019	2-08/31/2019	
Effluent Violation	'002 G 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C3	E90	3/31/2019			
Effluent Violation	'002 G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:2 C2	E90	11/30/2019			
Effluent Violation	'002 G 80082 BOD, carbonaceous [5 day, 20 C] See Comments Season ID:2 C3	E90	11/30/2019			
Effluent Violation	'002 G 00530 Solids, total suspended Effluent Gross Season ID:0 C2	E90	12/31/2020			
Effluent Violation	'002 G 00400 pH Effluent Gross Season ID:0 C1	E90	2/28/2021			
Effluent Violation	'002 G 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C2	E90	2/28/2021	T-04/30/2021	2-08/31/2021	
Effluent Violation	'002 G 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C3	E90	2/28/2021			
Effluent Violation	'002 G 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C2	E90	4/30/2021	T-04/30/2021	2-08/31/2021	
Effluent Violation	'002 G 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C3	E90	4/30/2021			

For the purposes of this permit, the deicing season shall include any month, **October through April**, in which deicing material is applied at Nashville International Airport at least once during that month