



REGION 4

ATLANTA, GA 30303

ELECTRONIC MAIL

CONFIRMATION OF EMAIL RECEIPT REQUESTED

Marco Goings
Mayor
Town of Crenshaw
600 Broad Street
Crenshaw, Mississippi 38621
townofcrenshaw@gmail.com

Dear Marco Goings:

The U.S. Environmental Protection Agency, Region 4 conducted a Compliance Evaluation Inspection (CEI) on the Town of Crenshaw Publicly Owned Treatment Works (POTW) on August 13, 2024. The objective of the CEI was to assess the Town's compliance with the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) permit, and to evaluate the general conditions of the POTW. The inspection results have been summarized in the enclosed CEI Report.

If you have specific questions about the inspection report, please contact Mr. Brad Ammons via email at ammons.brad@epa.gov or 404.562.9769. Please verify receipt of this letter and report by emailing Mr. Ammons at the email address provided.

Sincerely,
**JAIRO
CASTILLO**

Digitally signed by JAIRO
CASTILLO
Date: 2024.10.03
16:49:29 -04'00'

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

ENCLOSURES

1. Crenshaw MS POTW CEI Report

cc: James Gammill

Mississippi Department of Environmental Quality
jgammill@mdeq.ms.gov

Tracey Rosebud
Manager Partner of Mr. Quinn West
Town of Crenshaw
traceyrosebud@yahoo.com

United States Environmental Protection Agency Region 4
Enforcement and Compliance Assurance Division
Water Enforcement Branch
61 Forsyth Street, SW
Atlanta, Georgia 30303



Compliance Evaluation Inspection Report

Crenshaw POTW
Goodwin Street,
Crenshaw, MS 38621
NPDES Permit Number: MS0026930

Project No. CV-MS0026930-08132024

Date of Inspection:

August 13, 2024

Inspectors:

Brad Ammons, EPA Region 4
Mel-chilecee Taylor, EPA Region 4

Inspection Report Prepared by:

Brad Ammons

Title and Approval Sheet

Title: Crenshaw POTW CEI Report CV-MS0026930-08132024

Approving Official:

JAIRO
CASTILLO



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CASTILLO
Date: 2024.10.03
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Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Enforcement Officer:

MICHAEL AMMONS



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MICHAEL AMMONS
Date: 2024.10.02
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Brad Ammons, Environmental Engineer
Wastewater Enforcement Section
Water Enforcement Branch

COMPLIANCE EVALUATION INSPECTION REPORT
Crenshaw MS POTW, Project # CV-MS0026930-08132024

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1. Introduction

On August 13, 2024, representatives of the United States Environmental Protection Agency Region 4, and the Mississippi Department of Environmental Quality (MDEQ) conducted a Compliance Evaluation Inspection (CEI) on the Town of Crenshaw Publicly Owned Treatment Works (POTW), owned by the Town of Crenshaw, Mississippi (The Town) and operated by Tracey Rosebud. The inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. This report provides a summary of the inspection.

2. Participants

Name	Organization	Contact Information
Brad Ammons	EPA Region 4	Ammons.brad@epa.gov
Melchilecee Taylor	EPA Region 4	Taylor.melchilecee@epa.gov
James Gammill	MDEQ	jgammill@mdeq.ms.gov
Tracey Rosebud	Town Contractor	traceyrosebud@yahoo.com
Marco Goings	Mayor	Townofcrenshaw@gmail.com

3. Facility Description

The Crenshaw POTW is a single-cell lagoon publicly owned treatment works located on Missouri Avenue in Crenshaw, MS. The facility is currently permitted under National Pollutant Discharge Elimination System (NPDES) permit number MS0026930 to discharge 0.21 million gallons per day (MGD) from Outfall 001 into a ditch then to David Bayou.

The POTW consists of a single-cell lagoon with no aeration (facultative lagoon). The effluent passes through a chlorine contact chamber which uses chlorine tablets for disinfection. The treated effluent is injected with SO₂ gas for de-chlorination prior to discharge. The effluent passes over a weir prior to discharge to the pipe leading to the receiving stream/ditch.

The facility's current wastewater plant staff are as follows:

- One contract Mississippi Wastewater Treatment Class 4 Operator.

4. Inspection Procedures

The overall objective of this CEI was to evaluate the condition and operational performance of the POTW and Crenshaw's self-monitoring program and to offer compliance assistance as needed. Specific tasks included conducting an opening conference, interviewing POTW staff, reviewing laboratory and Discharge Monitoring Report (DMR) records, conducting a POTW walkthrough, and a closing conference.



Figure 1. Aerial View of Facility

5. Findings & Conclusions

A. Permit Review

Crenshaw's NPDES permit MS0026930 has an effective date of January 6, 2021, and expires on December 31, 2025. The NPDES permit lists Effluent Limitations and Monitoring Requirements for Outfall 001 (Treated Domestic Wastewater) that discharges into a ditch then to David Bayou.

B. Records and Reports

The EPA's Enforcement Compliance History Online (ECHO) shows that the Town failed to submit the Discharge Monitoring Report (DMR) for 2021-2024.

Recent DMRs and analytical results from Sledge's contract laboratory (Waypoint Analytical in Memphis, TN) were reviewed onsite, which the Town was able to reproduce for most of the required quarterly sampling for 2021-2023. The Town had a copy of their NPDES permit and during the inspection some of the analytical results, chain of custody, and DMRs were present which met permit required retention times and were well organized. Mr. Rosebud stated that he kept all the Town's maintenance logs, but that they were ruined in a flood in his home, so none

were produced. EPA and MDEQ suggested that he re-create the operational logs (weekly Residual Chlorine and Flow readings) digitally.

C. Flow Measurement

Mr. Rosebud uses a yardstick at the v-notch weir to measure flow and allegedly records the depth in his notebook (see note above about no operational records produced).

D. Sampling/Laboratory

Mr. Rosebud samples and analyzes the Residual Chlorine and Flow parameters weekly for the Town. The Town contracts with Waypoint Analytical in Memphis, TN to analyze pH, Dissolved Oxygen (DO), Biochemical Oxygen Demand, 5-day (BOD₅), Total Nitrogen, E. Coli, Total Phosphorus and Total Suspended Solids (TSS).

E. Site Visit (Operation and Maintenance)

The following components were observed:

- Chlorine tablets are used at the head of the chlorine contact chamber (Photo 1) and SO₂ is injected at the end of the chlorine contact chamber for dechlorination (Photo 2).
- The lagoon was completely covered in algae and the berm was covered in woody plants (Photo 3).

F. Sludge Handling

Sludge was not evaluated during the inspection as this is a lagoon. No record of lagoon dredging was available.

G. Effluent/Receiving Water

The effluent being discharged through Outfall 001 into the ditch was not evaluated during the inspection due to restricted access (overgrown vegetation). Effluent was being discharged at the time of the inspection.

6. Discussion

The facility DMR non-receipt SNC violations are due to not reporting laboratory analytical results into NetDMR. Most of the analytical results from Waypoint Analytical laboratory were produced, but Mr. Rosebud has not yet emailed three years of quarterly records as requested. Crenshaw should enter the sampling results into NetDMR immediately.

Algae are a naturally occurring and necessary part of facultative wastewater lagoons. Conventional green algae are a sign of a healthy lagoon. The oxygen they produce is necessary for bacteria to stabilize waste (and thus remove BOD) in the pond. However, too much algae in the

effluent can lead to TSS, BOD, and pH violations. Blue-green algae are filamentous and block sunlight, and some blue-green algae produce toxic and odorous byproducts. When algae in the effluent die, settle out, and decay, they exert some oxygen demand on the receiving stream (*Compliance Tips for Small Wastewater Treatment Lagoons with Clean Water Act Discharge Permit*, EPA Document # 305F22002, March 2022). Crenshaw should control algal growth in their lagoon to support adequate wastewater treatment.

END OF REPORT

Appendix 1: Photographic Log



Photo 1: Chlorine tablet injection point.

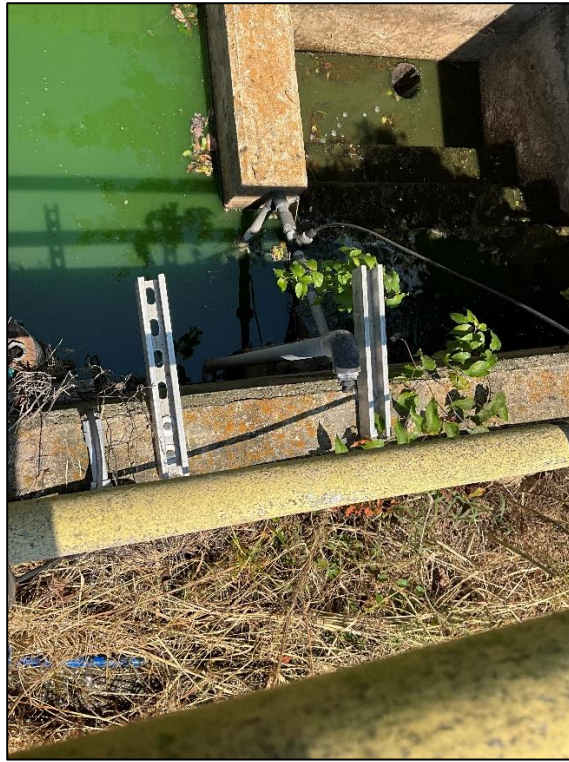


Photo 2: Sulfur Dioxide injection point. High algae effluent observed



Photo 3: Crenshaw lagoon and berm.