



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

ELECTRONIC EMAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Tim Releford, Director of Operations
Cascade Hollow Distilling Company
1950 Cascade Hollow Road
Tullahoma, Tennessee 37388
timothy.r.releford@diageo.com

Re: Compliance Evaluation Inspection
Diageo Americas Supply DBA Cascade Hollow Distilling Company
National Pollutant Discharge Elimination System Permit No. TN0002470

Dear Mr. Releford:

The U.S. Environmental Protection Agency, Region 4 conducted a Compliance Evaluation Inspection (CEI) of the above facility on October 13, 2021. Enclosed is the inspection report the CEI.

If you have specific questions regarding this CEI, please contact Mr. John C. Goodwin, of my staff, at (404) 562-8488 or via email at goodwin.john@epa.gov.

Sincerely,

JAIRO
CASTILLO

Digitally signed by JAIRO
CASTILLO
Date: 2021.12.14
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Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

cc: Jessica Murphy
TDEC

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4
Enforcement and Compliance Assurance Division
Water Enforcement Branch**



COMPLIANCE EVALUATION INSPECTION REPORT

Diageo Americas Supply
1950 Cascade Hollow Road
Tullahoma, Tennessee 37388

NPDES Permit No. TN0002470

Facility Address:
1950 Cascade Hollow Road
Tullahoma, Tennessee 37388

Inspection Dates:
October 13, 2021

Inspectors:
John C. Goodwin, Enforcement Officer, EPA Region 4
Brad Ammons, Enforcement Officer, EPA Region 4

Inspection Report Prepared by:
John C. Goodwin

November 15, 2021

Project ID: CV-TN-0002470-10-13-2021

Approval Sheet

Title: Compliance Evaluation Inspection Diageo Americas Supply, Tullahoma, Tennessee

Approving Official:

JAIRO
CASTILLO

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CASTILLO
Date: 2021.12.14
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12/14/2021

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

Date

Enforcement Officer:

MICHAEL AMMONS

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MICHAEL AMMONS
Date: 2021.12.13
17:09:24 -05'00'

12/13/2021

For:

John C. Goodwin, Environmental Engineer
Wastewater Enforcement Section
Water Enforcement Branch

Date

TABLE OF CONTENTS

1. Introduction	4
2. Facility Description	4
3. Inspection Procedures.....	4
4. Site Findings.....	4
5. Permit	5
6. Records and Reports.....	5
7. Laboratory	5
8. Effluent and Receiving Waters.....	5
9. Flow Measurement	6
10. Operations and Maintenance	6

**Compliance Evaluation Inspection
Diageo Americas Supply
Tullahoma, TN
NPDES Permit No. TN0002470**

1. INTRODUCTION

On October 13, 2021, personnel from the United States Environmental Protection Agency, Region 4 conducted a Compliance Evaluation Inspection (CEI) at the Diageo Americas Supply DBA Cascade Hollow Distilling Company facility (Diageo). The purpose of the CEI was to evaluate Diageo's compliance with its National Pollutant Discharge Elimination System (NPDES) permit.

The following individuals participated in the field inspection:

<u>Name</u>	<u>Organization</u>	<u>Telephone</u>
John C. Goodwin	EPA	404-562-8488
Brad Ammons	EPA	404-562-9769
Timothy Releford	Diageo	931-408-2402

2. FACILITY DESCRIPTION

Diageo owns and operates the facility doing business as Cascade Hollow Distilling Company, also commonly referred to as the George Dickel Distillery. The facility takes water from Cascade Branch and uses it as non-contact cooling water. The facility is permitted to discharge the non-contact cooling water, boiler blowdown, softener regeneration, and stormwater runoff through Outfall 002. The sampling point is at the basin of the cooling tower that discharges to the settling pond identified as George Dickel Lake. The effluent samples are collected from the effluent point on the cooling tower inline to the lake. The lake discharges back into Cascade Branch. No sanitary wastewater is permitted for discharge through Outfall 002.

3. INSPECTION PROCEDURES

The overall objective of this CEI was to evaluate the condition and operational performance of the permittee's self-monitoring program and offer compliance assistance as needed. Specific tasks included an opening conference, conducting an interview with the site management, reviewing Discharge Monitoring Reports (DMRs) and other records, conducting a site visit, and a closing conference.

4. SITE FINDINGS

The facility performs an ozone treatment prior to the cooling tower to prevent biofilm. A walkthrough of the site included the influent station, cooling tower, sampling point, the George Dickel Lake, and Outfall

#2. The influent station has four pumps and two centripetal separators to remove solids. A holding tank of approximately 20,000 gallons referred to as the “wastewater tank” stores the non-contact water prior to the cooling tower.

The lake’s area is estimated to be an acre and did not appear overly turbid. A digital thermometer was observed on the effluent line into the lake.

5. PERMIT

The facility maintains a permit under the NPDES permit number TN0002470. A permit renewal became effective on March 1, 2019, and it will expire on January 31, 2024. The name of the outfalls and the name of the receiving waters were as described in the permit. The facility is authorized to discharge through Outfall 002 into Cascade Creek and Cascade Branch. No flow limits are indicated in the Permit, but the facility typically discharges between 0.25 – 0.50 million gallons per day (MGD).

6. RECORDS AND REPORTS

DMRs and records for the previous year were reviewed for accuracy regarding sampling documentation and reporting of parameter concentrations. The self-monitoring records, including the chain of custody records and commercial laboratory results are maintained for a minimum of three years. The data reviewed was found to be consistent and accurately reported in accordance with the NPDES permit.

The facility has a history of exceeding the total suspended solids (TSS) and settleable solids effluent limitations according to the DMRs for the past three years. Tennessee Department of Environmental Conservation (TDEC) has issued three Notice of Violation letters within the past 12 months concerning the consistent solids exceedances. The facility’s response has been that the exceedances are occurring during rainfall events which account for the elevated amounts of solids in the influent stream. The current permit does not require influent samples to be taken for loading or percent removal comparison.

7. LABORATORY

The facility does not maintain a laboratory for sample analysis. All sampling analysis is performed by a commercial laboratory.

The commercial laboratory is:

Microbac Laboratories, Inc.
505 East Broadway Avenue
Maryville, Tennessee 37804
865-977-1200

This commercial laboratory was not evaluated.

8. EFFLUENT AND RECEIVING WATERS

The effluent discharges into Cascade Branch. At the time of inspection, the outfall discharge was free of floating solids, visible foam and sheen.

9. FLOW MEASUREMENT

The permit does not specify a designed flow capacity and only requires the facility to report flow measurements. No flow limits are indicated in the Permit, but the facility typically discharges between 0.25 – 0.50 million gallons per day (MGD).

10. OPERATIONS AND MAINTENANCE

A dam is positioned immediately downstream of the influent pumps. Sediment has washed into the stream and the facility representative stated that they are permitted to dredge the sediment for removal. The planned maintenance had not yet begun at the time of inspection. No deficiencies with respect to operations and maintenance were noted during the plant's walkthrough.

End of Report