



State of Mississippi

TATE REEVES

Governor

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

June 14, 2021

Sent via Federal Express

Honorable Shirley Sanderford
City of Hazlehurst
PO Box 549
Hazlehurst, MS 39083-0549

Re: Notice of Violation
Hazlehurst POTW, Lagoon
Hazlehurst, Mississippi
Copolah County
Water - NPDES Permit No. MS0023884

Dear Mayor Sanderford:

Attached is our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Hazlehurst POTW, Lagoon on April 19, 2021. This inspection revealed the following violation(s):

1. **Water-NPDES Permit No. MS0023884, Condition T-28:** "The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit....". The treatment plant needs attention in regards to repairs (inoperable influent pumps, inoperable aerators, inoperable sand filter, inoperable flow meter, and inoperable chlorine gas system), cleaning/housekeeping (vegetation noted in lagoon, on the sand filters, on the aeration blocks and in the chlorine contact chamber) and routine maintenance (lagoon levee erosion). Records should be kept when any of these activities are performed. A checklist is recommended for preventative maintenance activities during operator visits. *A post inspection review of 2019 and 2020 DMR data revealed several effluent violations, indicating the urgency for these tasks and repairs to be completed in order to have a properly operating system.*
2. **Water-NPDES Permit No. MS0023884, Condition T-25:** "All records and results of monitoring activities required by the permit, including calibration and maintenance records,

Agency Interest No. 13178
ENF20210001

OFFICE OF POLLUTION CONTROL

POST OFFICE BOX 2261 • JACKSON, MISSISSIPPI 39225-2261 • TEL: (601) 961-5171 • FAX: (601) 354-6612 • www.mdeq.ms.gov

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shall be retained by the permittee for a minimum of three (3) years...". No records have been provided for review as of this report.

Please submit the following documents within ten (10) days of receipt of this report for review for the period of October 2020 to May 2021:

1. All laboratory analysis results and laboratory analysis final reports;
2. All chain-of-custody forms;
3. All certified operator records showing any monitoring/sampling data and maintenance with dates of onsite visits, sampling and flow monitoring;
4. Calibration logs or records that document required calibration of any field or laboratory instrument or equipment used when collecting and/or analyzing your facility's samples.

We request that you respond to these alleged violations within ten days following the receipt of this letter. This response should contain: (1) actions that have been taken to correct the violation(s), (2) a schedule for correcting the violation(s), or (3) reasons why you believe the alleged violation(s) did not exist. We will review this information before determining if further action is warranted. Failure to submit this information may result in enforcement action.

If you have any questions concerning this matter, please contact me at (601) 961-5171.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rusty Lyons', with a stylized, cursive script.

Rusty Lyons, P.E., BCEE
Municipal and Private Facilities
Environmental Compliance and Enforcement Division



**Mississippi Department of Environmental Quality
Office of Pollution Control
Water Compliance Inspection Report**

Site Name: Hazlehurst POTW, Lagoon

Permit Number: Water - NPDES Permit No. MS0023884

Physical Address

2115 West Gallitin Street
Hazlehurst, MS 39083
Copiah County

Mailing Address

PO Box 367
Hazlehurst, Mississippi 39083

Evaluation Type: Compliance Evaluation Inspection - NPDES

Date of Evaluation: 04/19/2021

Facility Type: Minor Municipal

Inspection Participants: Mr. Jessie Hayden, Contract Certified Operator,
Mr. James Gammill, MDEQ,
Mr. Rusty Lyons, MDEQ

Purpose of Inspection

The City of Hazlehurst operates a wastewater treatment facility (Facility) under NPDES Permit No. MS0023884 with a discharge to Johnson Creek. MDEQ personnel conducted an inspection on April 19, 2021, to determine the facility's compliance with the conditions of the NPDES permit. This inspection was performed immediately following the inspection at City's activated sludge facility (NPDES Permit No. MS0023922)

Permit Status

The Hazlehurst POTW, Lagoon NPDES Permit was re-issued on June 13, 2017, and expires on May 31, 2022. The permit contains no compliance schedules and requires compliance with all limitations.

Facility Description

The City of Hazlehurst has two wastewater treatment facilities. This report is for the lagoon facility located on the north side of West Gallitin Street just west of I-55 (see Photo 1). Raw wastewater is pumped to the Facility from a pump station located at northeast corner of the property. The pumped wastewater enters an aerated lagoon cell with three blower mounted floating aerators and two circular donut type floating aerators. At the outlet end of the aerated cell, additional treatment is provided by an aerated, attached media series of enclosures, which are typically used to reduce the ammonia nitrogen concentration in wastewater. The air for the aerators is provided by bank-mounted blowers. Two sand filter cells follow the lagoon and are mainly to filter suspended solids from the wastewater. Following the sand filters is the chlorine contact chamber. A chlorine feed is located at the

beginning of the contact chamber for disinfection. An ultrasonic type flow meter is installed for flow measurement before a rectangular weir with end contractions. Cascade post aeration is used to raise the effluent dissolved oxygen concentration before discharge.

Inspection Summary

Mr. Gammill and I followed Mr. Hayden to the Facility after completing the activated sludge plant inspection. There was a gate located at the entrance, but was not locked. The access road was in good condition.

Treatment Observations

At the time of the inspection, the influent pump station was inoperable (see Photo 2). One pump was out for repairs and the other pump was beyond repair; therefore, a portable pump was being used to keep the water level in the wetwell pumped down.

The two donut type aerators were inoperable and sitting on the lagoon levee (see Photo 3). Mr. Hayden was unaware of how long they had been out of service and there were no notes in the operator or facility's logbooks for the aerators. The blower-mounted aerators were operating (see Photo 4). There was erosion occurring on the inside of the concrete apron around the levee and the water surface of the lagoon was covered with duckweed (see Photos 4 & 5). The aerated blocks were operable; however, significant vegetation was observed growing on the top of the blocks (see Photo 6).

The sand filters were being bypassed at the time of the inspection and the surface of the filters was covered with vegetation (see Photo 7). A post inspection review of the 2020 DMR data in EPA's database revealed violations of the maximum monthly average and maximum weekly average limitations for Ammonia Nitrogen for the annual submittal. Therefore, the sand filters should be returned to service and should not be removed from service without a request to MDEQ after extensive sampling to ensure compliance could be maintained without them.

Chlorine gas is normally used for disinfection, but the feed system was inoperable. It was not known how long the gas feed system had been inoperable, not how long it would be before repairs could be made. Mr. Hayden stated that he places calcium hypochlorite tablets in the cascade aeration area for disinfection. There were no tablets observed. The water in the chlorine contact chamber was light green in appearance with some floating duckweed (see Photo 8).

The flow meter was inoperable. Mr. Hayden stated that he uses the pump run time for calculating the flow rate. Due to the inoperable influent pumps, there was very little flow being discharged. The small volume of flow appeared to be mostly clear (see Photo 9).

Records Review

Mr. Hayden did not have records available for review at the time of the inspection. In addition, records were requested for July 2020 and January and March 2021, but have not been received.

Conclusions

The following alleged violations were noted as a result of this inspection:

1. **Water-NPDES Permit No. MS0023884, Condition T-28:** “The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit...”. The treatment plant needs attention in regards to repairs (inoperable influent pumps, inoperable aerators, inoperable sand filter, inoperable flow meter, and inoperable chlorine gas system), cleaning/housekeeping (vegetation noted in lagoon, on the sand filters, on the aeration blocks and in the chlorine contact chamber) and routine maintenance (lagoon levee erosion). Records should be kept when any of these activities are performed. A checklist is recommended for preventative maintenance activities during operator visits. *A post inspection review of 2019 and 2020 DMR data revealed several effluent violations, indicating the urgency for these tasks and repairs to be completed in order to have a properly operating system.*
2. **Water-NPDES Permit No. MS0023884, Condition T-25:** “All records and results of monitoring activities required by the permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years...”. No records have been provided for review as of this report. Please submit the following documents within ten (10) days of receipt of this report for review for the period of October 2020 to May 2021:
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In addition to the above violations, the following recommendation is being made:

1. The NPDES permit only requires instantaneous monitoring; however, monitoring would be more accurate if the flow meter was operating. At a minimum, flow measurements should be taken using the rectangular weir instead of using pump run times.

Signature: _____ **Date:** _____

Photos / Other Attachments

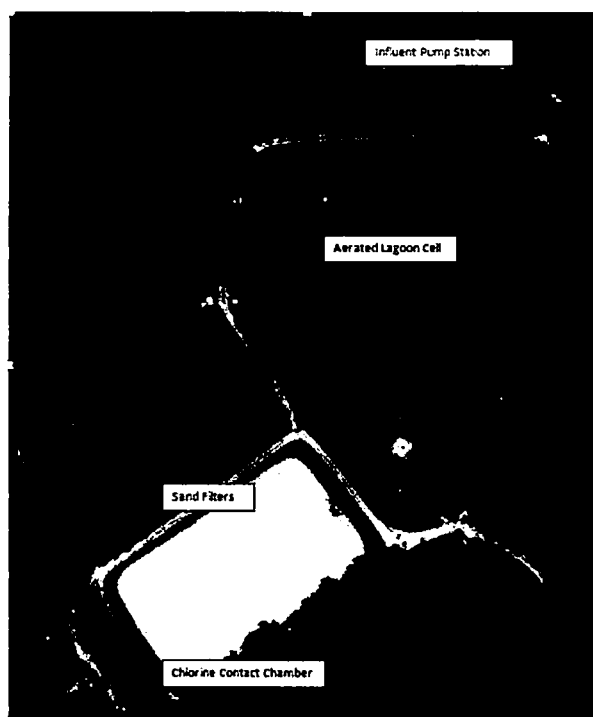


Photo 1: Aerial of Hazlehurst Lagoon POTW



Photo 2: Influent pump station water level



04/19/2021

Photo 3: One of two inoperable aerators

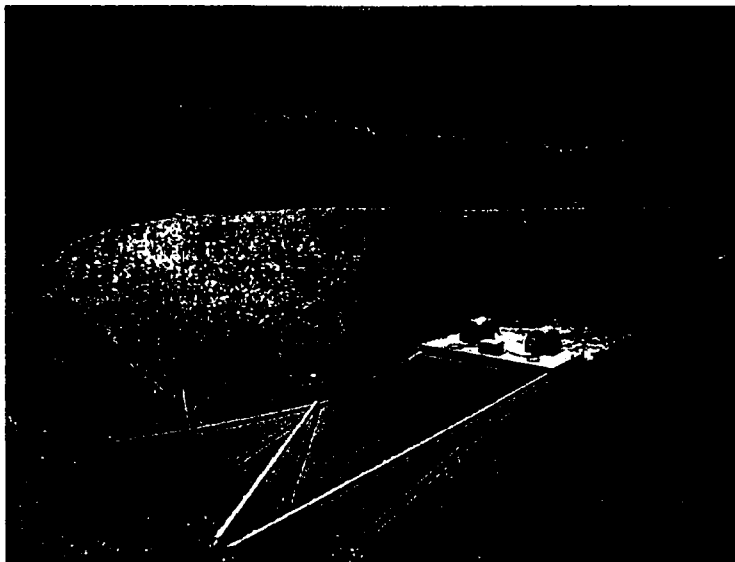


Photo 4: Aerator and duckweed



Photo 5: Erosion behind concrete apron

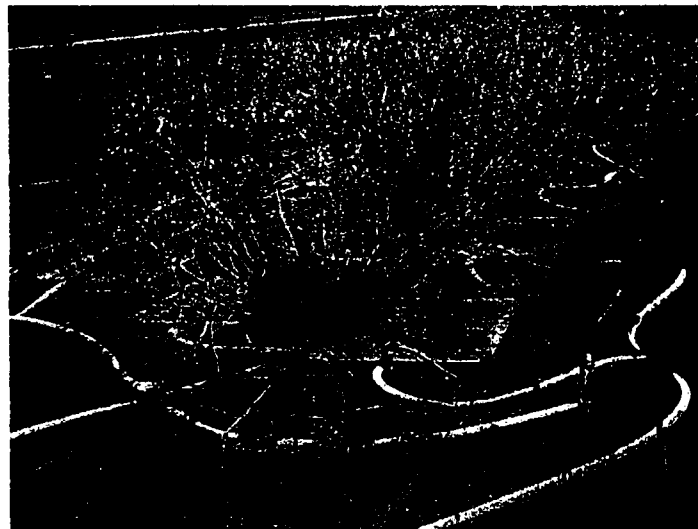


Photo 6: Aerated blocks with vegetation on top



Photo 7: One of two sand filters



Photo 8: Chlorine contact basin

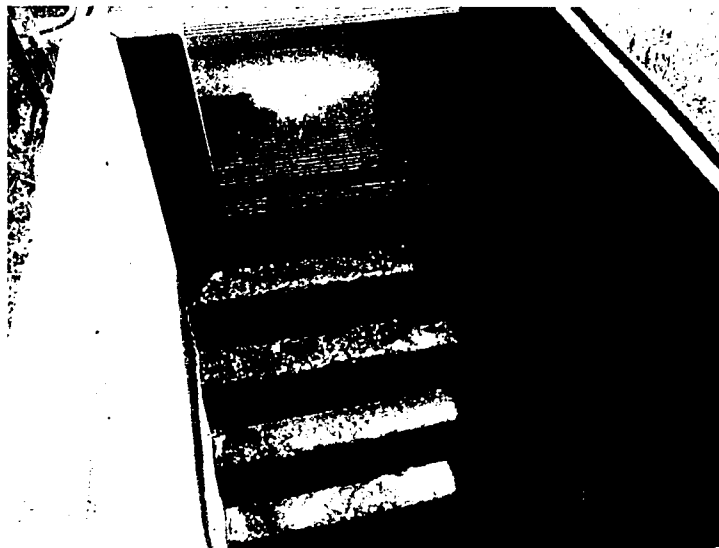


Photo 9: Rectangular weir and cascade post aeration