



REGION 4

ATLANTA, GA 30303

James Rayford
Mayor
Town of Lambert
Highway 322 East
Lambert, MS 38643
lambertutilities@gmail.com

Dear James Rayford:

The U.S. Environmental Protection Agency, Region 4 conducted a Compliance Evaluation Inspection on the Town of Lambert Publicly Owned Treatment Works (POTW) on August 13, 2024. The objective of the inspection was to assess the Town of Lambert compliance with the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) permit, and to evaluate the general condition 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 Ms. Mel-Chilecee Taylor via email at taylor.melchilecee@epa.gov or 404.562.9586. Please verify receipt of this letter and report by emailing Ms. Taylor at the email address provided.

Sincerely,
JAIRO
CASTILLO

Digitally signed by JAIRO
CASTILLO
Date: 2024.09.11
13:51:00 -04'00'

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

ENCLOSURES

1. Lambert MS POTW CEI Report

cc: James Gammill
Mississippi Department of Environmental Quality
jgammill@mdeq.ms.gov

William Q. West
Contract Operator, Town of Lambert
gmwest104@gmail.com

Tracey Rosebud
Manager Partner of Mr. West, Town of Lambert
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
Lambert POTW
Highway 322 East,
Lambert, MS 38643
NPDES Permit Number: MS0020231

Project No. CV-MS0020231-08132024

Date of Inspection:
August 13, 2024

Inspectors:
Mel-Chilecee Taylor, EPA Region 4
Brad Ammons, EPA Region 4
James Gammill, MDEQ

Inspection Report Prepared by:
Mel-Chilecee Taylor

Title and Approval Sheet

Title: Lambert MS POTW CV-MS0020231-08132024.docx
Project No. CV-MS0020231-08132024

Approving Official:

JAIRO
CASTILLO

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

Enforcement Officer:

Taylor,
Melchilecee

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Melchilecee
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Mel-Chilecee Taylor, Physical Scientist
Wastewater Enforcement Section
Water Enforcement Branch

COMPLIANCE EVALUATION INSPECTION REPORT
Lambert MS POTW, Project # CV-MS0020231-08132024

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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 Lambert Publicly Owned Treatment Works (POTW), owned by the Town of Lambert, Mississippi (The Town) and operated by Mr. Tracey Rosebud, Manager partner of William Q. West. 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
Mel-Chilecee Taylor	EPA Region 4	Taylor.Melchilecee@epa.gov
Brad Ammons	EPA Region 4	Ammons.Brad@epa.gov
James Gammill	MDEQ	jgammill@mdeq.ms.gov
Tracey Rosebud	Town Contractor Assistant	traceyrosebud@yahoo.com

3. Facility Description

The Lambert POTW is a lagoon publicly owned treatment works located on Highway 322 East in Lambert, MS. The facility is currently permitted under NPDES permit number MS0020231 to discharge 0.75 million gallons per day (MGD) from outfall 001 into a Ditch then to Muddy Bayou.

The POTW consists of two facultative lagoons with aeration (aerators were out of service during this CEI). The effluent passes through a chlorine contact chamber which uses gaseous chlorine for disinfection. The effluent also has SO₂ gas for de-chlorination prior to discharge. The effluent passes over a flat weir plate prior to discharge to the pipe leading to the receiving stream.

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

- One Mississippi Wastewater Treatment Class 4 Operator;
- One Service Worker.

4. Inspection Procedures

The overall objective of this CEI was to evaluate the condition and operational performance of the POTW and Lambert's self-monitoring program and to offer compliance assistance as needed. Specific tasks included conducting an opening conference, interviewing POTW staff, reviewing WWTP 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

Falcon's NPDES permit for the POTW has an effective date of November 21, 2023, and expires on October 31, 2028. The NPDES permit lists and describes the outfall as Outfall 001 (Treated Domestic Wastewater) into a Ditch then to Muddy Bayou.

The NPDES permit contains Effluent Limitations and Monitoring Requirements table for Outfall 001 at the POTW's current capacity of 0.75 MGD.

B. Records and Reports

The EPA's Enforcement Compliance History Online (ECHO) shows that the POTW was in Non-Compliance (NC) and Significant Non-Compliance (SNC) for Discharge Monitoring Report (DMR) non-receipt for 2021-2023.

Recent DMRs and analytical results from Lambert's contract laboratory (Waypoint Analytical in Ridgeland, MS) were reviewed onsite. According to Waypoint Analytical no samples were collected or sampled for any parameter since 2019 for the Lambert POTW. 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 agreed to email three years of quarterly records. EPA hasn't received the records. Finally, Mr. Rosebud stated that he kept all the Town's maintenance logs, but that the logs were damaged at his home and moving forward, plans to keep all records at the City Hall.

C. Flow Measurement

Mr. Rosebud uses a yardstick at the v-notch weir to determine flow.

D. Sampling/Laboratory

Mr. Rosebud samples/analyzes the Residual Chlorine parameter for the Town. The Town contracts with Waypoint Analytical in Ridgeland, MS to analyze Biochemical Oxygen Demand (BOD₅), BOD percent removal, Ammonia-Nitrogen, Total Nitrogen, E. Coli, Total Phosphorus and Total Suspended Solids and TSS percent removal.

- Waypoint Analytical appears to be sampling for fecal and should be sampling for E.coli.

E. Site Visit (Operation and Maintenance)

The POTW consists of two-cell lagoons with aeration in the first cell (aerators were out of service during this CEI). The effluent passes through a chlorine contact chamber which uses gaseous chlorine for disinfection. The effluent also has SO₂ gas for de-chlorination prior to discharge. The effluent passes over a flat weir plate prior to discharge to the pipe leading to the receiving stream. The following components were observed:

- The ventilation fan of the gas chlorine room was inoperable.
- Full and empty Gas chlorine cylinders open to the sun and no safety chain was used to keep cylinders from falling over (Photo 1 & 2).
- Sulfur Dioxide being applied to disinfected treated water with high presence of duckweed (Photo 3).
- Leak in the wall of the Chlorine Contact Chamber (photo 5).
- On Cell 1, there are three aerators, one aerator was removed to be repaired and the other two were inoperable (Photo 6 & 7).
- There is no valve control to shut effluent from entering cells.

F. Sludge Handling

Sludge was not evaluated during the inspection. No record of lagoon dredging was available.

G. Effluent/Receiving Water

The effluent at the end of treatment leading to Outfall 001 was not evaluated during the inspection due to restricted access (overgrown vegetation). The facility's plant has not been in operation and no flow 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. The facility has no record on hand of any use of daily or weekly operating log, nor documentation of written preventive maintenance log where sampling has taken place due to damage to records at the Mr. Rosebud's home, who at the time of the inspection was not a Certified Wastewater Operator. Mr. Rosebud is to email three years of quarterly records. Waypoint Analytical appears to be sampling for fecal and should be sampling for E. coli. The facility should rehabilitate/repair health and safety items and treatment units noted in the Site Visit section of this inspection report.

END OF REPORT

Appendix 1: Photographic Log



Photo 1: Gas chlorine cylinders



Photo 2: Gas chlorine cylinders exposed to the environment.



Photo 3: Sulfur Dioxide injection location and Weir



Photo 4: Chlorine Gas injection location



Photo 5: Leak in the Chlorine contact chamber wall



Photo 6: Lagoon- Cell 1



Photo 7: View of lagoon cell 2