REGION 4
ATLANTA, GA 30303

ELECTRONIC EMAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Billie Bales
Director of Finance
Gecon Leasing, LLC
1557 S. Broad Street
Monroe, Georgia 30665
geconleasing@gmail.com

Re: Mayfield Lagoon Compliance Evaluation Inspection Report
NPDES Permit No. GA0021873

Dear Billie Bales:

The U.S. Environmental Protection Agency, Region 4 and the Georgia Environmental Protection Division inspected the Mayfield Water Pollution Control Plant located at Hamburg State Park Road, Jewell, Georgia on December 4, 2023, for compliance with its National Pollutant Discharge Elimination System permit and the Clean Water Act.

The inspection findings are provided in the enclosed Compliance Evaluation Inspection Report. If you have any questions about the inspection report, please contact Mr. William Joyner at 404-562-8795 or via email at joyner.william@epa.gov.

Sincerely,

JAIRO CASTILLO
Digitally signed by JAIRO CASTILLO
Date: 2024.02.12 17:01:29 -05'00'

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

Enclosure

cc: Johanna Smith, P.E.
Georgia Environmental Protection Division
johanna.smith@dnr.ga.gov

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

City of Mayfield Water Pollution Control Plant
NPDES Permit: GA0021873
Project No. CV-GA0021873-12042023

Hamburg State Park Road
Jewell, Georgia, 31045

Inspection Date: December 04, 2023

Inspector:
William Joyner, EPA Region 4
Tristan Odekirk, EPA Region 4

Inspection Report Prepared by: William Joyner

Approval Sheet

Title: Compliance Evaluation Inspection, Mayfield Water Pollution Control Plant, Jewell, Georgia

Approving Official:

JAIRO CASTILLO

Digitally signed by JAIRO CASTILLO
Date: 2024.02.12 17:02:16 -05'00'

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

Enforcement Officer:

Joyner, William

Digitally signed by Joyner, William
Date: 2024.02.12 16:53:54 -05'00'

William Joyner, Environmental Engineer
Wastewater Enforcement Section
Water Enforcement Branch

Table of Contents

1. INTRODUCTION

Representatives of the U.S. Environmental Protection Agency, Region 4 and the Georgia Department of Natural Resources, Environmental Protection Division (GA-EPD) conducted a Compliance Evaluation Inspection (CEI) at the Mayfield Water Pollution Control Plant (WPCP) owned by Gecon Leasing, LLC. The WPCP is located at Hamburg State Park Road, Jewel, Georgia. The inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. The WPCP was purchased by Gecon Leasing, LLC in September of 2022. This narrative report and attachments present the results of the inspection.

An opening conference was held on December 4, 2023, at the Gecon Leasing, LLC office followed by a walk through of the facility.

2. PARTICIPANTS

Name	Position	Phone umber
William Joyner	EPA Inspector	404-562-8795
Tristan Odekirk	EPA Inspector	404-562- 9295
Samantha Wagner	GA-EPD Inspector	404-473-1226
Lynn Whitaker	Mayfield Property Manager	706-444-6288

3. FACILITY DESCRIPTION

The WPCP is a single cell facultative lagoon that consist of an influent pump station and wet well and chlorination contact chamber. Disinfection is achieved by liquid chlorine prior to dechlorination. Sodium Sulfate tablet de-chlorination is used to remove residual chlorine prior to entering the receiving stream. Wastewater is collected from approximately 48 residences.

4. INSPECTION PROCEDURES

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

5. FINDINGS AND CONCLUSIONS

A. PERMIT

The National Pollutant Discharge Elimination System (NPDES) permit number GA0021873 was not available at the time of the inspection. The permittee is authorized to discharge treated domestic wastewater into Fulsome Creek through Outfall 001.

B. RECORDS AND REPORTS

There were no records or reports available to review at the time of the inspection. Facility documents were located at the Gecon Leasing office in Monroe, Georgia.

EPA conducted a review of the Integrated Compliance Information System database for the months of December 2020 through June 2023. Appendix 2 shows the summary of the City's compliance history of the NPDES permit effluent limits.

C. FLOW MEASUREMENT

The flow meter and the effluent totalizer chart were operational.

D. Sampling Review

The permittee had no analytical laboratory results, DMR's, or operator log documents to review at the time of the inspection. According to the property manager the permittee used CSRA Analytical Laboratories, Inc until September of 2023. As of December 2023, CSRA Informed the permittee that they would not be returning to service the WPCP.

E. Operations and Maintenance

(Refer to Attachment 1 for cited photographs)

- Both Influent pumps were operational (Photo 1,2).
- Effluent flowing through Palmer-Bowlus Flume (Photos 3).
- The calibration label on the flow meter was illegible (Photo 4).
- Liquid chlorine is added via a 30–40-gallon drum 24 hours a day (Photo 5).
- Effluent chart was operating (Photo 6).
- The Chlorine contact chamber chlorine injector pumps were operating. However, excessive foaming was observed (Photo 7).
- Sodium Sulfate tablet de-chlorination tank was observed in good conditions (Photo 8).
- EPA observed excessive vegetative growth inside the perimeter of the lagoon near the water line (Photo 10).

F. Effluent and Receiving Waters

The effluent discharging to the creek was gray in color (See Photo 11).

6. Discussion

The permittee was informed of the inspection and confirmed that facility documents would be available for the inspection. However, during the opening conference the property manager called the permittees office and was unable to confirm documents would be available for the meeting.

A. Part II A. (Proper Operation and Maintenance Requirements) of the NPDES permit states, "The permittee shall properly maintain and operate effectively all treatment or control facilities and related equipment installed or used by the permittee to achieve compliance with this permit. Efficient operation and maintenance include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. Back-up or auxiliary facilities or similar systems shall be operated only when necessary to achieve permit compliance."

   i. Excessive algae growth can potentially impact disinfection efficiency and can cause effluent limits exceedances.
   ii. Excessive brush and tree growth on the banks of the lagoon can lead to a degradation of the lagoon banks over time. The town should manage and control the vegetation on the lagoon banks to prevent root penetration of the bank.
   iii. Maintaining adequate laboratory and process control is an element of proper operation and maintenance of the facility. EPA advises the permittee to retain a properly certified laboratory in lieu of CSRA Analytical Laboratories should CSRA continue to not provide services in the future to conduct sample analysis.

B. Part II.A.6 (Operator Certification Requirements) of the NPDES Permit states, "The person responsible for the daily operation of the facility must be a Class III Certified Operator in compliance with the Georgia State Board of Examiners for Certification of Water and Wastewater Plant Operators and Laboratory Analysts Act, as amended, and as specified by Subparagraph 391-3-6-.12 of the Rules and Regulations for Water Quality Control. All other operators must have the minimum certification required by this Act."

   i. The EPA advises the permittee to secure a Class III operator as soon as possible.

APPENDIX 1
Photographic Log

Photo 1. Influent pump station.

Photo 2. Both influent submersible pumps were operational.

Photo 3. Effluent flowing through the Palmer Bowlus Flume.

Photo 4. Flow Meter calibration label was illegible.

Photo 5. Liquid Chlorine tank.

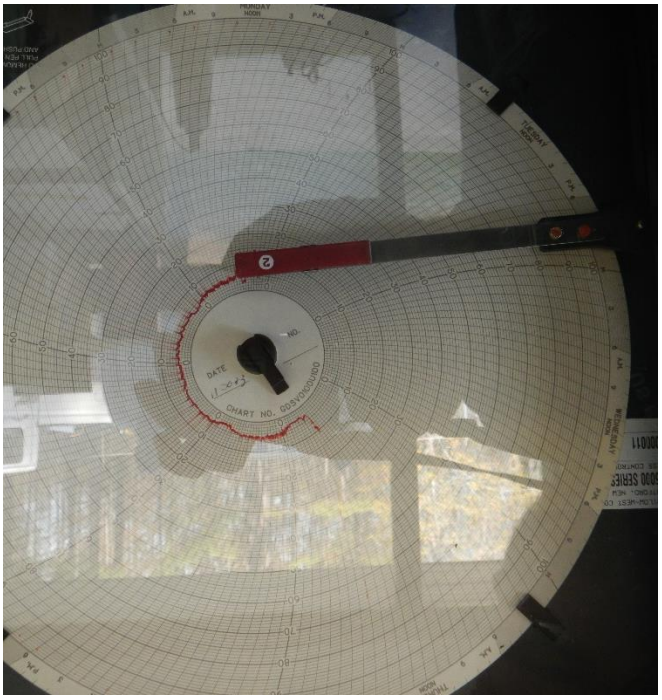

Photo 6. Effluent chart was operational.

Photo 7. Chlorine contact Chamber.

Photo 8. Sodium Sulfate tablet de-chlorination Tank.

Photo 9. Effluent flowing into lagoon.

10. Vegetative growth observed inside the perimeter of the lagoon near the water line.

Photo 11. Effluent at outfall was gray in color.

APPENDIX 2

Permit Compliance History

monitoring Period End Date	Parameter Description	Permit Limit Value	DMR Value	Units	Violation Type
12/31/2020	Solids, total suspended	8.5	17.1	kg/d	Non-Reportable Noncompliance
12/31/2020	Solids, total suspended	45	76.5	mg/L	Non-Reportable Noncompliance
1/31/2021	Flow	0.075	0.088	MGD	Non-Reportable Noncompliance
1/31/2021	Flow	0.06	0.077	MGD	Non-Reportable Noncompliance
2/28/2021	Flow	0.06	0.123	MGD	Non-Reportable Noncompliance
2/28/2021	Flow	0.075	0.196	MGD	Non-Reportable Noncompliance
3/31/2021	Flow	0.075	0.188	MGD	Non-Reportable Noncompliance
3/31/2021	Flow	0.06	0.079	MGD	Non-Reportable Noncompliance
4/30/2021	Flow	0.075	0.099	MGD	Non-Reportable Noncompliance
8/31/2021	Solids, total suspended	8.5	13.5	kg/d	Non-Reportable Noncompliance
8/31/2021	Flow	0.075	0.292	MGD	Non-Reportable Noncompliance
9/30/2021	Flow	0.075	0.094	MGD	Non-Reportable Noncompliance
10/31/2021	Chlorine, total residual	0.01	0.02	mg/L	Significant/Category I Noncompliance
11/30/2021	Chlorine, total residual	0.01	0.11	mg/L	Significant/Category I Noncompliance
12/31/2021	Flow	0.08	0.089	MGD	Non-Reportable Noncompliance
12/31/2021	Chlorine, total residual	0.01	0.19	mg/L	Significant/Category I Noncompliance
1/31/2022	Chlorine, total residual	0.01	0.21		Significant/Category I Noncompliance
2/28/2022	Flow	0.06	0.075		Non-Reportable Noncompliance
2/28/2022	Chlorine, total residual	0.01	0.18		Significant/Category I Noncompliance
3/31/2022	Flow	0.08	0.135		Non-Reportable Noncompliance
3/31/2022	Chlorine, total residual	0.01	0.19		Non-Reportable Noncompliance
3/31/2022	Coliform, fecal general	400	1200		Non-Reportable Noncompliance
4/30/2022	BOD, 5-day, 20 deg. C	8.5	11.4		Non-Reportable Noncompliance
4/30/2022	Solids, total suspended	8.5	13.3		Non-Reportable Noncompliance
4/30/2022	Flow	0.06	0.09	MGD	Non-Reportable Noncompliance
4/30/2022	Flow	0.08	0.86	MGD	Non-Reportable Noncompliance
4/30/2022	Chlorine, total residual	0.01	0.31	mg/L	Significant/Category I Noncompliance
5/31/2022	Chlorine, total residual	0.01	0.019	mg/L	Significant/Category I Noncompliance

6/30/2022	Chlorine, total residual	0.01	0.1	mg/L	Significant/Category I Noncompliance
7/31/2022	Flow	0.08	0.104	MGD	Non-Reportable Noncompliance
8/31/2022	Chlorine, total residual	0.01	0.24	mg/L	Significant/Category I Noncompliance
9/30/2022	Chlorine, total residual	0.01	0.38	mg/L	Significant/Category I Noncompliance
10/31/2022	BOD, 5-day, 20 deg. C	45	105	mg/L	Non-Reportable Noncompliance
10/31/2022	BOD, 5-day, 20 deg. C	30	50.9	mg/L	Non-Reportable Noncompliance
10/31/2022	Chlorine, total residual	0.01	0.14	mg/L	Significant/Category I Noncompliance
11/30/2022	Chlorine, total residual	0.01	0.1		Significant/Category I Noncompliance
12/31/2022	BOD, 5-day, 20 deg. C	8.5	9.68		Non-Reportable Noncompliance
12/31/2022	Flow	0.08	0.084		Non-Reportable Noncompliance
12/31/2022	Chlorine, total residual	0.01	0.49		Significant/Category I Noncompliance
1/31/2023	Solids, total suspended	8.5	11.7		Non-Reportable Noncompliance
1/31/2023	Flow	0.08	0.26		Non-Reportable Noncompliance
1/31/2023	Flow	0.06	0.075		Non-Reportable Noncompliance
1/31/2023	Chlorine, total residual	0.01	0.11		Significant/Category I Noncompliance
2/28/2023	Flow	0.08	0.133		Non-Reportable Noncompliance
2/28/2023	Flow	0.06	0.097		Non-Reportable Noncompliance
2/28/2023	Chlorine, total residual	0.01	0.25		Significant/Category I Noncompliance
3/31/2023	Flow	0.08	0.128		Non-Reportable Noncompliance
3/31/2023	Flow	0.06	0.088		Non-Reportable Noncompliance
3/31/2023	Chlorine, total residual	0.01	0.12		Non-Reportable Noncompliance
4/30/2023	Chlorine, total residual	0.01	0.19	mg/L	Significant/Category I Noncompliance
5/31/2023	Chlorine, total residual	0.01	0.13	mg/L	Significant/Category I Noncompliance
6/30/2023	Chlorine, total residual	0.01	0.16	mg/L	Significant/Category I Noncompliance

END OF REPORT