



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

ELECTRONIC EMAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Ms. Jo Anna McMahon
Director, Environmental Health and Safety
Central State Water Resources
1630 Des Peres Rd., Suite 140
St. Louis, Missouri 63131
env.comp@cswrgroup.com

Re: Reconnaissance Inspection Report (RI)
NPDES Permit No. MS0055671
Great River Utility Operating Company LLC, Grand Oaks

Dear Ms. McMahon:

The U.S. Environmental Protection Agency, Region 4, conducted a Reconnaissance Inspection of the Great River Utility Operating Company LLC, Grand Oaks located at South Montgomery Street, Starkville, Mississippi on June 7, 2022, for compliance with its National Pollutant Discharge Elimination System permit and the Clean Water Act.

The inspection findings are provided in the enclosed Reconnaissance Inspection Report. If you have any questions concerning the inspection report, please contact Tristan Odekirk at 404-562-9295 or via email at Odekirk.Tristan@epa.gov.

Sincerely,

Castillo, Jairo

Digitally signed by
Castillo, Jairo
Date: 2022.07.14
15:16:22 -04'00'

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

Enclosure

cc: Ms. Michelle Clark
Mississippi Department of Environmental Quality

Michael Dick



United States Environmental Protection Agency
Region 4
CV-MS-0055671-6-7-2022
Reconnaissance Inspection Report

SECTION A: National Data System Coding

NPDES No.	MO/DAY/YR	Inspection-Type	Inspector	Facility-Type
MS0055671	6/7/2022	ROS (Reconnaissance without Sampling)	Tristan Odekirk/Richard Elliott	Publicly owned treatment works

SECTION B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Great River Utility Operating Company LLC, Grand Oaks Subdivision South Montgomery Street, Starkville, Mississippi, 39759	Entry Date/Time 6/7/2022 10:00 AM Exit Date/Time 6/7/2022 10:50 AM	Permit Effective Date 2/7/2020 Permit Expiration Date 1/31/2025
Names of On-site Representative(s)/Title(s)/Phone and Fax Number(s) On-site representatives are listed in Section D Michael Dick, Central States Water Resources, 217-741-8746 Ross Williams, Operator, 662-574-9634	Other Facility Data n/a	
Name, Address of Responsible Official/Title/Phone and Fax Number Enrique Chavez Junior, 314-736-4672	Contacted ☒ Yes ☐ No	

SECTION C: Areas Evaluated During Inspection (Check only those areas evaluated)

☒ Permit	☒ Flow Measurement	☐ Operation & Maintenance	☐ CSO/SSO (Sewer Overflow)
☒ Records/Reports	☐ Self-Monitoring Program	☐ Sludge Handling/Disposal	☐ Pollution Prevention
☒ Facility Site Review	☐ Compliance Schedules	☐ Pretreatment	☐ Multimedia
☒ Effluent/Receiving Waters	☐ Laboratory	☐ Storm Water	☐ Other:

SECTION D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

Attached below.

Name(s) and Signature(s) of Inspector(s) TRISTAN ODEKIRK Tristan Odekirk Digitally signed by TRISTAN ODEKIRK Date: 2022.07.14 15:22:32 -04'00'	Agency/Division/Phone and Fax Number EPA/ECAD/(404) 562-9295	Date 7/14/2022
Signature of Management QA Reviewer Castillo, Jairo Jairo Castillo Digitally signed by Castillo, Jairo Date: 2022.07.14 15:16:35 -04'00'	Agency/Division/Phone and Fax Number EPA/ECAD/(404) 562-9257	Date 7/14/2022



United States Environmental Protection Agency
Region 4
CV-MS-0055671-6-7-2022
Reconnaissance Inspection Report
(Continued)

Section D: Summary of Findings / Comments

On June 7, 2022, the U.S. Environmental Protection Agency, Region 4, conducted a Reconnaissance Inspection (RI) of the Great River Utility Operating Company LLC, Grand Oaks Subdivision wastewater treatment lagoon (Facility) located at the end of Live Oak Lane off South Montgomery Street. The Facility is owned and operated by Central States Water Resources Inc. The Wastewater Treatment Plant (WWTP) is operated by a contract operator. Mr. Ross Williams, who is employed by Midwest Water Operations, is the operator of record. The inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. This report and attachments present the results of the inspection.

I. FACILITY DESCRIPTION

The Facility is a single cell wastewater treatment lagoon that treats domestic wastewater from the Grand Oaks Subdivision (Figure 1). Wastewater flows by gravity to the lagoon and enters the lagoon at two locations. Effluent from the lagoon passes through a pipe that serves as a contact chamber. A chlorine tablet dispenser is installed in a manhole through which the outlet pipe from the lagoon passes. Effluent from the lagoon flows through the outlet pipe but the Chlorine tablet dispenser did not have the tablets in contact with the treated effluent (Figure 2) as effluent flow was too low. The disinfection process was, as a result, negatively affected. After chlorination, effluent discharges directly to the receiving water body (Figure 3).

II. INSPECTION PROCEDURES

The objective of this RI was to evaluate the condition of the Facility's aerated lagoon and the permittee's self-monitoring program and offer compliance assistance as needed. Specific tasks included conducting an opening conference, interviewing Facility staff, conducting a site visit to the lagoon and the receiving waters, and a closing conference.

III. COMPLIANCE HISTORY

A review of EPA's Enforcement and Compliance History Online (ECHO) showed that in the October-December 2021 quarter the facility reported effluent permit limit violations for nitrogen as ammonia and dissolved oxygen. Further past violations included failure to report DMRs for 7 quarters and effluent violations for 5-day biochemical oxygen demand, E. Coli, nitrogen as ammonia, and total suspended solids for October-December 2020. When asked about effluent violations the operator claimed that the facility had just been bought by the Central States Water Resources group for maintenance and operations and thus the operator did not know what previous operators and owners had done. The operating company is currently under a compliance agreement with the state of Mississippi to return all owned facilities to compliance. Under the agreement, the new owners have begun sampling the facility to characterize the wastewater.

IV. PERMIT

The permit was issued March 2, 2022, and expires January 31, 2025. The Facility is permitted to discharge from one outfall to Skinner Creek, a tributary of Hollis Creek. Discharge monitoring reports are due annually by the 28th of January of the following year.

V. FLOW MEASUREMENT

No flow measurement device was visible in the wastewater system. The operator stated that improvements and repairs are planned for this facility.

VI. OPERATIONS AND MAINTENANCE

In the past year administrative operation and maintenance of the facility was transferred to the fully digital company Central States Water Resources. Central States Water Resources coordinates with the operator, Ross Williams, who works with Midwest Water Operations and serves as the operator of record. A large tree was growing from the sidewall of the lagoon (Figure 4). The small size of the lagoon raises questions as to the adequacy of the treatment due to the potential for short circuiting and reduced detention time.

VII. EFFLUENT AND RECEIVING WATERS

There was no visible sheen or foaming in the effluent or the receiving waters.

VIII. ATTACHMENTS



Figure 1. View of Grand Oaks wastewater treatment lagoon



Figure 2. Chlorine contact chamber. Water has limited contact with chlorine tablets.



Figure 3. Receiving waters and sample point.



Figure 4. Tree growing on the inside wall of the wastewater lagoon berm.

END OF REPORT