

LSASD Project ID: 23-0118 and 23-0119

Sampling and Analysis Plan

**City of Senatobia Back Acres
Subdivision and Heartland
Catfish Company Inc.**

**National Pollution Discharge
Elimination System (NPDES)
National Compliance Initiative
(NCI) Reconnaissance Sampling
Inspections**

Location: Senatobia and Itta Bena MS

Project Date(s): August 7th – 9th, 2023

Final SAP Approval Date: August 4, 2023

Project Leader: Chris McHugh

Water Quality Section

Field Services Branch

Laboratory Services & Applied Science Division

USEPA – Region 4

980 College Station Road

Athens, Georgia 30605-2720

The ANSI National Accreditation Board attests that U.S. EPA Region 4 Laboratory Services and Applied Science Division fulfills the requirements of ISO/IEC 17025:2017 ANAB Forensic Testing & Calibration AR 3125:2019 in the field of Forensic Testing. The activities contained in this report fall within the scope of accreditation, Certificate Number: AT-2628. Expires 08 June 2024.



LABORATORY SERVICES & APPLIED SCIENCE DIVISION

Project Requestor:

Jairo Castillo
Wastewater Enforcement Section
Enforcement & Compliance Assurance Division
Division
USEPA – Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Analytical Support:

Inorganic Chemistry Section
Laboratory Services Branch
Laboratory Services and Applied Science
980 College Station Rd Athens, GA 30605

Waypoint Analytical
Ridgeland, MS

Approvals:

Chris McHugh
Water Quality Section
Field Services Branch

Date

Approving Officials:

Morris Flexner, Technical Reviewer
Water Quality Section
Field Services Branch

Date

Greg White, Supervisor
Water Quality Section
Field Services Branch

Date

This Sampling and Analysis Plan (SAP) is designed to be used in conjunction with the *Applied Science Branch Quality Assurance Project Plan* December 2019.

SECTION A: Project Planning Elements

A1. Distribution List

Recipient	Organization	Address/Email
Jairo Castillo	USEPA Region 4 Enforcement & Compliance Assurance Division	64 Forsyth St. SW Atlanta, Georgia 30303-8960 castillo.jairo@epa.gov
Shelia M. Hollimon	USEPA Region 4 Enforcement & Compliance Assurance Division	64 Forsyth St. SW Atlanta, Georgia 30303-8960 Hollimon.Shelia@epa.gov
Greg White	US EPA Region 4 Laboratory Services & Applied Science Division	980 College Station Road Athens, Georgia 30605-2720 White.greg@epa.gov

A2. Project Personnel

Team Members ¹	Organization	Responsibilities
Chris McHugh	EPA/R4/LSASD	LSASD Project Lead, Safety, Sampling
Asher Sampong	EPA/R4/LSASD	Safety, Sampling

¹Project Leader and all Task Leaders assisting with this project have been deemed competent by LSASD management to conduct the tasks required to fulfill the prescribed goals.

A3. Site Description and Background Information

Heartland Catfish is a fish producing business located at 55001 U.S Hwy 82 West, Itta Bena, MS. The business is currently permitted to discharge treated process wastewater and stormwater runoff under NPDES permit MS0051098 into Yazoo River.

Heartland Catfish did not receive any violations during quarter 12 and has an undetermined violation status for quarter 13. The business did receive a letter of violation from the State of Mississippi on 2/15/2023. The reason for the violation letter was not stated.

City of Senatobia Back Acres Subdivision Lagoon is located at the end of Pine Cove Rd. The plant is currently permitted to discharge treated domestic wastewater under NPDES permit MS0033162 into Senatobia Creek.

City of Senatobia Back Acres Subdivision Lagoon is currently listed on the EPA Office of Enforcement and Compliance Assurance (OECA) significant non – compliance list, for failure to report quarterly discharge monitoring reports (DMR). The facility has been in non – compliance status for the past 12 quarters and falls under the Environmental Justice initiative.

A4. Problem Definition

The purpose of the Reconnaissance Inspection (RI) with sampling for each site is to make and record visual observations of each site, collect representative effluent wastewater samples for analysis and provide evidence for potential compliance problems where appropriate. The analytical data will be provided to U.S. EPA Region 4 Enforcement and Compliance Assurance Division (ECAD) for evaluation of effluent discharge parameters: 5-day biochemical oxygen demand (BOD₅), total suspended solids (TSS), E. Coli, phosphorus (P), and ammonia (NH₃), nitrate/nitrite, and Total Kjeldahl Nitrogen (TKN) at each location.

A5. Project Description, Goals, and Study Boundaries

Study Goal:

LSASD will collect NPDES effluent discharge samples at each facility based on each facility's NPDES permit.

LSASD will provide an analytical sample evaluation report containing the effluent discharge sample results compared to each facility's NPDES permitted discharge limitations.

LSASD will evaluate and provide a summary of each facility's NPDES sampling program.

Study Objectives:

Collect samples at each effluent discharge location.

Evaluate the facility's sampling procedures, sampling equipment, and assess overall facility conditions as needed.

Study Area:

The study area for each sampling evaluation is the effluent discharge location at each WWTP.

Study Design/Approach:

The planned approach utilizes a composite sampler and a collection container or grab sampling to collect an influent and effluent composite sample as necessary based on the facility's NPDES permit. Operating procedures for all sampling and field measurement activities outlined in this study plan are referenced in Section B5: Sampling and Measurement Procedures.

Senatobia Lagoon – Grab Samples (BOD₅, TSS, NH₃, P, TKN, NO₂, NO₃, and E. coli) and In-situ parameters (Total Residual Chlorine, Dissolved Oxygen and pH).

Heartland Catfish – Grab Samples (BOD₅, TSS, NH₃, P, TKN, NO₂, NO₃ and E. Coli) and In-situ parameters (Total Residual Chlorine, Dissolved Oxygen and pH).

Quality Control Samples

A temperature blank in sample coolers will be used to monitor the sample temperature after collection and upon sample delivery to the Contract Lab Program partner, Waypoint Analytical (E. Coli Samples), and the LSASD sample custody room.

A field duplicate sample will be collected at each inspection.

Project Timeline:

All field activities are planned for the week of August 7th, 2023.

Proposed schedule (subject to change):

August 7th – Drive to Oxford, MS

August 8th – Collect grab sample at Senatobia, travel to Itta Bena and collect sample at Heartland Catfish, drive to Contract Lab Program partner in Ridgeland, MS to deliver samples for E. Coli. Stay in Jackson and/or appropriate city on the way back to LSASD.

August 9th – Drive back to LSASD and deliver samples.

A6. Applicable Regulatory Information

40 CFR 136

NPDES Permit No: MS0033162 (City of Senatobia), and MS0051098 (Heartland Catfish Inc.)

A7. Decision(s) to be made based on data

The results of this study will support the ECAD Water Enforcement Branch workplan. ECAD will use the analytical data as needed for any future enforcement actions against the wastewater treatment facilities

SECTION B: Data Generation, Acquisition, and Reporting

Will samples or physical evidence be collected:	☒ Yes – If yes, complete all subsections in Section B.
	☐ No – If no, no action needed for B1, B2, B3 or B4, proceed to B5.

B1. Sampling Design/Information Inputs

Sample Media	Total Number of Samples	Analyses
Effluent Wastewater	1 BOD ₅ ½ gallon 1 (NH ₃ , NO ₂ , NO ₃ , TKN, P) 1L poly 1 TSS 1L poly 1 E. Coli 125 ml poly	Total Suspended Solids (TSS), Ammonia, Nitrate, Nitrite, TKN, Phosphorus, Biochemical Oxygen Demand (BOD ₅), E. Coli and In-situ parameters (Total Residual Chlorine, Dissolved Oxygen and pH)
Effluent Wastewater	1 BOD ₅ ½ gallon 1 (NH ₃ , NO ₂ , NO ₃ , TKN, P) 1L poly 1 TSS 1L poly 1 Fecal 500 ml poly	Total Suspended Solids (TSS), Ammonia, Nitrate, Nitrite, TKN, Phosphorus, Biochemical Oxygen Demand (BOD ₅), E. Coli and In-situ parameters (Total Residual Chlorine, and Dissolved Oxygen and pH)

B2. Sampling Handling and Custody

As outlined in the *Field Services Branch Quality Assurance Project Plan*, all samples will be handled and custody maintained in accordance with the LSASD Laboratory Services Branch Laboratory Operations and Quality Assurance Manual, LSASD Operating Procedure for Sample and Evidence Management, LSASDPROC-005, and LSASD Operating Procedure for Packing, Labeling and Shipping of Environmental and Waste Samples, LSASDPROC-209.

Will a Chain-of-Custody be produced?	☒ Yes
	☐ No

Throughout the duration of the event, have preparations been made to ensure that custody is maintained?

Custody of a sample or physical evidence is defined as:

- *It is in the actual possession of an investigator*
- *It is in the view of an investigator, after being in their physical possession*
- *It was in the physical possession of an investigator and then they secured it to prevent tampering*
- *It is placed in a designated secure area*

☒ **Yes**

☐ **No**

B3. Quality Control

Field quality control measures will be in accordance with the Operating Procedure for Field Sampling Quality Control, LSASDPROC-011. The sample equipment and in-situ meters will be calibrated and set-up prior to use.

Laboratory quality control measures are specified in the *LSASD Laboratory Services Branch Laboratory Operations and Quality Assurance Manual (LOQAM)*. Waypoint Analytical will document and compile laboratory quality control measures in the sample result package. The sample result package will be reviewed by a senior chemist at EPA/Region 4 LSASD laboratory in Athens, GA to ensure analyses are conducted in accordance with the *LSASD (LOQAM)*.

B4. Analytical Methods and Support

Samples will be analyzed by the EPA/Region 4 LSASD laboratory in Athens, GA in accordance with the *LSASD Laboratory Services Branch Laboratory Operations and Quality Assurance Manual*. Specific analytical methods include:

Ammonia as N, TKN: EPA 350.1

Nitrate/Nitrate: EPA 353.1

Phosphorus: EPA 365.1

TSS: USGS 1-3765-85

BOD₅: SM5210.B

Samples submitted to a Contract Laboratory Program (CLP) laboratory will be analyzed in accordance to the current statement of work.

Fecal Coliform: E. coli: Standard method 9223B E. Coli

Laboratory Turn-Around-Time Requested: 30 Days

Reporting Levels:	☐ Non-Routine Reporting Levels ARE NOT Required, No Further Action. ☒ Non-Routine Reporting Levels ARE Required, List Below.
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Non-Routine
Reporting Levels:

Waste Samples Anticipated:

☐ Yes
☐ No
☐ Unknown

If answer is yes, specify laboratory name/address to receive samples:

NA

B5. Sampling and Measurement Procedures

Sampling and measurement activities will be in accordance with the LSASD operating procedures. The following field procedures will be followed during this study, check all that apply: *(Last Update: 09/13/2022)*

Field Measurement Procedures*		LSASD/SESDPROC-	Revision
☒	Field pH Measurement	100	R5
☐	Field Specific Conductance Measurement	101	R7
☒	Field Temperature Measurement	102	R6
☐	Field Turbidity Measurement	103	R5
☐	Groundwater Level and Well Depth Measurement	105	R4
☒	Field Measurement of Dissolved Oxygen	106	R4
☐	Field X-Ray Fluorescence (XRF) Measurement	107	R5
☒	Wastewater Flow Measurement	109	R5
☒	Global Positioning System	110	R5
☒	In-Situ Water Quality Monitoring	111	R5
☒	Field Measurement of Total Residual Chlorine	112	R6
☐	Field Measurement of Oxidation-Reduction Potential (ORP)	113	R3
General Field Sampling Procedures*		LSASD/SESDPROC-	Revision
☐	Sediment Sampling	200	R4
☐	Surface Water Sampling	201	R5
Hazardous Waste Section Field Sampling Procedures*		LSASD/SESDPROC-	Revision
☐	Soil Sampling	300	R4
☐	Groundwater Sampling	301	R5
☐	Waste Sampling	302	R4
☐	Ambient Air Sampling	303	R5
☐	Potable Water Supply Sampling	305	R4
☒	Wastewater Sampling	306	R5
☐	Soil Gas Sampling	307	R4
Water Quality Section Field Sampling Procedures*		LSASD/SESDPROC-	Revision
☐	Hydrological Studies	501	R6
☐	Reaeration Measurement by Diffusion Dome	505	R5
☐	Sediment Oxygen Demand	507	R5
☐	Multi-Habitat Macroinvertebrate Sampling in Wadeable Freshwater Streams	508	R5
☐	Marine Macroinvertebrate Field Sampling	511	R5
☐	Fish Field Sampling	512	R5
☐	Pore Water Sampling	513	R4
☐	Bottom Water Sampling for Sulfide	515	R0

***If procedures allow for different sampling and measurement methods, the utilized method(s) must be identified in the project description section. Additionally, verify procedure revision numbers before issuance of SAP.**

Section C: Reporting

C1. Reporting

Estimated Report Completion Date: 10/6/2023

Is a Provisional Data Release Anticipated?

☐ Yes

☒ No

Provisional data may be provided prior to the completion of the LSASD final report only if LSASD management approves the release of the information and the analytical data have been released as final from the LSASD Laboratory Services Branch, for LSASD generated data, and/or the LSASD Quality Assurance Section, for non-LSASD generated data. Release of provisional data will be transmitted by electronic or hard copy with official correspondence from the Section Supervisor in accordance with the LSASD Operating Procedure for Report Preparation and Distribution (LSASDPROC-003).

Additional Comments: Provisional data may be released to EPA R4 Enforcement and Compliance Assurance Division pending issuance of final report.

Site Figures and Tables

Table 1: Effluent Limitations for Heartland Catfish

Parameter	Permitted Limit	Unit	Frequency	Limitation
Dissolved Oxygen (DO)	≥ 6.0	mg/L	2x per month	Daily Minimum
BOD ₅	196	mg/L	month	Daily Maximum
NH ₃	38.0	mg/L	Daily	Daily Maximum
pH	$6 \leq \text{pH} \leq 9$	SU	2x per month	Range
TSS	469	mg/L	2x per month	Daily Maximum
E. Coli	410	# of colonies/100 ml	2x per month	Daily Maximum
TRC	1.5	mg/L	2x per month	Daily Maximum
Phosphorus	Report	mg/L	Quarterly	Daily Maximum

Table 2: Effluent Limitations for City of Senatobia Back Acres Subdivision

Parameter	Permitted Limit	Unit	Frequency	Limitation
Dissolved Oxygen (DO)	≥ 6.0	mg/L	Quarterly	Daily Minimum
BOD ₅	45	mg/L	Quarterly	Daily Maximum
NH ₃	3.0	mg/L	Quarterly	Daily Maximum
pH	$6 \leq \text{pH} \leq 9$	SU	Quarterly	Range
TSS	45	mg/L	Quarterly	Daily Maximum
TRC	0.019	mg/L	Weekly	Daily Maximum
E. Coli	410	# of colonies/100 ml	Quarterly	Daily Maximum
Phosphorus	Report	mg/L	Quarterly	Daily Maximum



Figure 1: Map of Heartland Catfish



Figure 2: Map of Senatobia Back Acres Lagoon

End of Sampling and Analysis Plan

LSASD Project ID: 23-0119

National Pollutant Discharge Elimination System National Compliance Initiative Reconnaissance Inspection



City of Senatobia Back Acres Subdivision Lagoon

**End of Pine Cove Road
Senatobia, MS,**

Project Date: August 8th, 2023

Report Date: October 5th, 2023

Project Leader: Chris McHugh
Water Quality Section
Field Services Branch
Laboratory Services & Applied Science Division
USEPA – Region 4
980 College Station Road
Athens, Georgia 30605-2720

The ANSI National Accreditation Board attests that U.S. EPA Region 4 Laboratory Services and Applied Science Division fulfills the requirements of ISO/IEC 17025:2017 ANAB Forensic Testing & Calibration AR 3125:2019 in the field of Forensic Testing. The activities contained in this report fall within the scope of accreditation, Certificate Number: AT-2628. Expires 08 June 2024.

LSASD
LABORATORY SERVICES & APPLIED SCIENCE DIVISION

Project Requestor:

Jairo Castillo-Valenzuela, Supervisor
Wastewater Enforcement Section
Enforcement & Compliance Assurance Division
USEPA – Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Analytical Support:

Inorganic Chemistry Section
Laboratory Services Branch
Laboratory Services and Applied Science
Division
980 College Station Rd Athens, GA 30605

Waypoint Analytical
235 Highpoint Dr
Ridgeland, MS, 39157 Ridgeland, MS

Approvals:

Chris McHugh
Water Quality Section
Field Services Branch

Approving Officials:

Joel Owen, Technical Reviewer
Water Quality Section
Field Services Branch

Greg White, Section Supervisor
Water Quality Section
Field Services Branch

Introduction

On August 8th, 2023, representatives of the U.S. Environmental Protection Agency (U.S. EPA) Region 4 Laboratory Services and Applied Science Division (LSASD) conducted a National Pollutant Discharge Elimination System (NPDES) reconnaissance sampling inspection at the City of Senatobia Back Acres Subdivision Wastewater Treatment Plant in Senatobia, MS. The evaluation was requested by the Enforcement & Compliance Assurance Division (ECAD) Water Enforcement Branch as part of the agency's goal to address significant non-compliance facilities. The inspection followed the procedures listed in the LSASD Project No. 23-0119 Sample and Analysis Plan (SAP). There were no deviations from the SAP throughout the course of this inspection. All standard operating procedures used to conduct this assessment were followed as prescribed and are listed in the project's SAP. Table 1 lists the sampling participants and facility staff.

Table 1 – Inspection Personnel

Name	Position Organization	Dates on site
Chris McHugh	Inspector U.S EPA Region 4 LSASD	August 8 th , 2023
Asher Sampong	Inspector U.S EPA Region 4 LSASD	August 8 th , 2023
Michael Griffith	Chief, Water II Branch MDEQ	August 8 th , 2023

Background

The Back Acres Subdivision lagoon is authorized by the NPDES Permit No. MS0033162 to discharge its effluent via outfall 001 into an unnamed creek that flows into Senatobia Creek.

Currently, this facility is listed on the EPA Office of Enforcement and Compliance Assurance (OECA) significant/category 1 non-compliance for a variety of effluent discharge limit violations and failure to submit monthly discharge monitoring reports for the last 12 months. The City of Senatobia took ownership of the lagoon on October 1, 2021. The City is currently awaiting final plan approval with a local engineering company before it has the plant discharge routed to the City of Senatobia WWTP.

Study Area and Methodology

The study area for the sampling evaluation was the effluent discharge pipe after chlorine disinfection. A grab sample was collected analyzed for Total Suspended Solids (TSS), Ammonia (NH₃), Nitrate/Nitrite

(NO₃, NO₂), Total Kjeldahl Nitrogen (TKN), Phosphorus (P), Biochemical Oxygen Demand (BOD₅) and E. coli. In – situ parameters of pH and dissolved oxygen (DO) were measured with a multi – parameter meter and total residual Chlorine (TRC) with a pocket chlorimeter. Analytical methods used during this study are provided in this project’s SAP.

Sample Analysis Results

Below in Table 2 are the analytical results for the sample collected at EFF001 after final chlorine disinfection stage in the contact chamber. Note, DO and TRC results exceeded the permitted limits. The full analytical results listed below in Table 3 are included in the final report PDF portfolio.

Table 2: EPA Sample Results vs. Permitted Limits (Highlighted Exceedances)

Analyte	EPA Analytical Results	Permitted Limit	Sample Location	Sample Date and Time
Total Suspended Solids (TSS)	20 mg/L	≤ 45 mg/L Daily Max	EFF001	8/8/23 11:20 am
BOD ₅	17 mg/L *A, J, H-8	≤ 45 mg/L Daily Max	EFF001	8/8/23 11:20 am
NH ₃ as N	0.56	≤ 3 mg/L Weekly Max	EFF001	8/8/23 11:20 am
Nitrate/Nitrite	0.050 *U	N/A	EFF001	8/8/23 11:20 am
Total Phosphorus	0.90	Report only mg/L	EFF001	8/8/23 11:20 am
Total Kjeldahl Nitrogen (TKN)	4.7	Report only mg/L	EFF001	8/8/23 11:20 am
E. coli – grab sample	3 MPN/100mL	<410 of colonies/100 ml Weekly Max	EFF001	8/8/23 11:20 am
Total Nitrogen (sum of NH ₃ , Nitrate/Nitrite, TKN)	5.31 mg/L	Report only mg/L	EFF001	calculation
Dissolved Oxygen (DO) – In-situ	< 2.0 mg/L*	≥ 7.0 mg/L Weekly Min	EFF001	8/8/23 11:20 am

pH – In-situ	7.6 S.U.	6.0 S.U. < pH < 9.0	EFF001	8/8/23 11:20 am
Total Residual Chlorine - Grab	0.73 mg/L	<0.019 mg/L	EFF001	8/8/23 11:20 am

**

A The analyte was analyzed in replicate. Reported value is an average value of the replicates.

H-8 Recommended analytical holding time exceeded.

J The identification of the analyte is acceptable; the reported value is an estimate.

U The analyte was not detected at or above the reporting limit.

Table 3: Analytical Results (See attached documents in PDF portfolio)

Analysis	Total Pages
TSS, BOD ₅	8
Nitrate/Nitrite, Phosphorus, TKN	9
E. coli	11

Quality Assurance/ Quality Control

Chemistry data for analyses conducted by LSASD Laboratory Services Branch (LSB) were verified and qualified based on Laboratory Operations and Quality Assurance Manual (LOQAM) found on <https://www.epa.gov/quality/epa-region-4-laboratory-services-branch-laboratory-operations-and-quality-assurance-manual>. Quality control for the analyses: TSS, BOD₅, Nitrate/Nitrite, Phosphorus TKN and Total Nitrogen can be found in the quality control section of each attached analytical data package (E233203 CNA FINAL 08 24 23 and E233203 CNA FINAL 09 07 23).

E. coli analysis performed by Waypoint Analytical was analyzed using Standard Method 9223B – 2016 using EPA – Approved IDEXX Colilert. All provided certifications and accreditations are valid and unexpired. Copies of the certifications and quality control are included in the attached analytical package 23-166-0055.

Summary

The City of Senatobia Backacres Subdivision is currently being maintained by the City of Senatobia and follow-up via telecommunications with the City of Senatobia are advised to ensure the progress on rerouting the facility's discharge to Senatobia WWTP is completed as scheduled.

EPA Sampling Results

- Dissolved oxygen levels (< 2.0 mg/L) were below the minimum permitted limit (6.0 mg/L).
- The total residual Chlorine (0.73 mg/L) exceeded the permit limit of (< 0.019 mg/L).

Appendix A Photo Log

Figure 1: Lagoon view – Taken 8/8/23 Time: 15:15



Figure 2: Effluent Discharge Chlorine Tablet feed system. Taken 8/8/23 Taken 15:00

End of Report



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

**Laboratory Services & Applied Science Division
980 College Station Road
Athens, Georgia 30605-2720**

October 5th, 2023

MEMORANDUM

SUBJECT: City of Senatobia Backacres of Subdivision
Final Report
Senatobia, MS
LSASD Project ID: 23-0119

FROM: Chris McHugh
Environmental Engineer
Water Quality Section

THRU: Greg White, Supervisor
Water Quality Section

TO: Jairo Castillo-Valenzuela, P.E., Supervisor
Wastewater Enforcement Section Enforcement
& Compliance Assistance Division

Attached is the Final Report for the City of Senatobia Backacres Subdivision NPDES NCI Reconnaissance Sampling Inspection.

If you have any questions concerning the sampling event, please call me at 706-410-4082 or email me at mchugh.christopher@epa.gov.

Attachments:
cc (via email): Shelia Holiman, ECAD
Sandra Aker, LSASD

Mission: To provide sound Science to our customers through superior environmental evaluation

Vision: To be a solutions-oriented organization, and seen as a leader in sound science through innovation, responsive customer service, and cutting-edge expertise

8/16/2023

EPA Region IV
Mr. Chris McHugh
980 College station Road
Athens, GA, 30605

Ref: Analytical Testing
Lab Report Number: 23-221-0002
Client Project Description: Analytical Testing

Dear Mr. Chris McHugh:
Waypoint Analytical, LLC. received sample(s) on 8/9/2023 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method. Where the laboratory was not responsible for the sampling stage (refer to the chain of custody) results apply to the sample as received.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2021) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Connie Cook
Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.



Certification Summary

Laboratory ID: WP MTN: Waypoint Analytical, LLC., Memphis, TN

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2024
Florida	State Program - NELAP	E871157	06/30/2024
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2024
Illinois	State Program - NELAP	200078	10/10/2023
Kentucky	State Program	80215	06/30/2024
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2024
Mississippi	State Program	MS	11/14/2025
North Carolina	State Program	47701	07/31/2024
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2024
South Carolina	State Program	84002	06/30/2023
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2023
Virginia	State Program	00106	06/30/2024
Virginia	State Program - NELAP	460181	09/14/2023

Laboratory ID: WP RMS: Waypoint Analytical Mississippi, Inc., Ridgeland, MS

State	Program	Lab ID	Expiration Date
Arkansas	State Program	88-1409	02/01/2024
Kentucky	State Program	KY98013	12/31/2023
Louisiana	State Program - NELAP	04023	06/30/2024
North Carolina	State Program	694	12/31/2023



Sample Summary Table

Report Number: 23-221-0002

Client Project Description: Analytical Testing

Lab No	Client Sample ID	Matrix	Date Collected	Date Received	Method	Lab ID
91748	23-0118	Aqueous	08/08/2023 15:30	08/09/2023	9223B-2016	WP RMS
91749	23-0119	Aqueous	08/08/2023 10:20	08/09/2023	9223B-2016	WP RMS

10536

EPA Region IV

Mr. Chris McHugh

980 College station Road

Athens , GA 30605

Project Analytical Testing

Information :

Report Date : 08/18/2023

Received : 08/09/2023

Report Number : **23-221-0002**

REPORT OF ANALYSIS

Lab No : **91748**

Matrix: **Aqueous**

Sample ID : **23-0118**

Sampled: **8/8/2023 15:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
E-coli	54	MPN/100mL	1	1	08/08/23 17:11	HVS	9223B-2016

**Qualifiers/
Definitions**

DF

Dilution Factor

MQL

Method Quantitation Limit

10536

EPA Region IV

Mr. Chris McHugh

980 College station Road

Athens , GA 30605

Project Analytical Testing

Information :

Report Date : 08/18/2023

Received : 08/09/2023

Report Number : **23-221-0002**

REPORT OF ANALYSIS

Lab No : **91749**

Sample ID : **23-0119**

Matrix: **Aqueous**

Sampled: **8/8/2023 10:20**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
E-coli	3	MPN/100mL	1	1	08/08/23 17:11	HVS	9223B-2016

**Qualifiers/
Definitions**

DF

Dilution Factor

MQL

Method Quantitation Limit

G183877

[illegible]

All samples sizes are 100 mL unless otherwise noted.

* A Y/N in this column indicates whether an additional 4 hours incubation was required

Rate
8/15/23

Waypoint Analytical Mississippi, Inc. Confidential

G183877

8/15/2023 8:37 AM

WAYPOINT ANALYTICAL MISSISSIPPI
MICROBIOLOGY: Media Control Check

Instructions: Test each lot of Colilert media for performance by inoculation with three control bacteria minimally quarterly . Three control bacteria are used: EC Positive: *Escherichia coli* , TC Positive: *Klebsiella variicola* and a Negative Control: *Pseudomonas auerginosa* . Prepare and process as a sample. Record the results of the controls. Also process a sterile water control. If the sterile water control exhibits faint fluorescence or faint positive coliform result, discard and use a new batch of media. Incubate these controls at 35 + 0.5°C for 24 hours. Read and record the results.

Expectations of Controls and Blank		Yellow Color Observed	Fluorescence Observed
	E. coli	Yes	Yes
	Total Coliform	Yes	No
	Negative Control	No	No
	Blank (Sterile Water)	No	No

MICRO INC top- 26531

Incubator ID:	B0 D 6	Thermometer ID: Micro Inc Bottom				
Colilert ID:	CS-2016	Yellow Color Observed	Fluorescence Observed	Accept	Reject	Date/Initials
Colilert Lot#	fu 330					
Date/Time In:	06/09/2023 16:30					
Incubator Temp °C	35.5/35					
E. coli ID:	23-REAG-0454	yes	yes	✓		HVS 06/10/23
Total Coliform ID:	23-REAG-0451	yes	no	✓		↓
Negative Control ID:	23-REAG-0452	no	no	✓		
Sterile Water ID:	23-REAG-0896	no	no	✓		
Date/Time Out:	06/10/2023 11:00					
Incubator Temp °C	35.5/35					

Incubator ID:	B00 6	Thermometer ID:					
Colilert ID:	CS-2107	Yellow Color Observed	Fluorescence Observed	Accept	Reject	Date/Initials	
Colilert Lot#	W1550						
Date/Time In:	07/05/23 15:58						
Incubator Temp °C	35.5/35						
E. coli ID:	23-REAG-0454	yes	yes	✓		HVS	07/10/23
Total Coliform ID:	23-REAG-0451	yes	no	✓		↓	
Negative Control ID:	23-REAG-0452	no	no	✓			
Sterile Water ID:	23-REAG-0896	no	no	✓			
Date/Time Out:	07/10/23 15:59						
Incubator Temp °C	35.5/35						

Add media lot # as well

Check sterility of multi-well trays one per lot by aseptically adding 100mL of tryptic soy broth, seal and incubate at 35 ± 0.5 °C for up to 48 hours.

No growth indicates sterility. Note that if the wells become very turbid (indicating a non-sterile condition), there could be gas production and concurrent blowout between wells.

		Growth - with nutrient broth or TSB					
		Test Started		24 hr check		48 hr check	
Lot Number	Date Rec'd	date/time/initials	Y	N	date/time/initials	Y	N
AS01	4/15/21	3/22/21	✓		4/16/21 15:05	✓	
AT011		4/10/21	✓		4/26/21 15:00	✓	
AT012		5/6/21	✓		5/13/21 12:16	✓	
BT028		6/16/21	✓		6/17/21 16:44	✓	
BT600		7/19/21	✓		7/20/21 14:17	✓	
DT023J		8/24/21	✓		8/25/21 8:35	✓	
FT017J		9/23/21	✓		9/24/21 16:14	✓	
GT018J		10/18/21	✓		10/19/21 16:57	✓	
FT015J		1/11/22	✓		1/12/22 10:00	✓	
LT017J		3/31/22 14:48 wms	✓		4/1/22 15:23	✓	
AV06	4/4/22	4/4/22 13:50 wms	✓		4/5/22 13:50	✓	
AV037J		5/3/22 14:18 MA	✓		5/4/22 14:30	✓	
CU022J		6/27/22 9:32 MA	✓		6/28/22 9:58	✓	
DU023J		8/3/22 13:59 MA	✓		8/4/22 14:00 MA	✓	
EU028J		10/20/22 14:08 AA	✓		10/21/22 8:54 AA	✓	
GV004J		01/24/23 16:15 HVS	✓		01/25/23 16:35 HVS	✓	
HU007J		03/13/23 15:05 HVS	✓		03/14/23 16:11 HVS	✓	
KU017J		05/10/23 15:46 HVS	✓		05/11/23 16:05 HVS	✓	
LU018J		07/10/23 15:34 HVS	✓		07/11/23 16:05 HVS	✓	
SV105J							

Shipment Receipt Form

Customer Number: **10536**

Customer Name: **EPA Region IV**

Report Number: **23-221-0002**

Shipping Method

☐ Fed Ex	☐ US Postal	☒ Lab	☐ Other :	
☐ UPS	☐ Client	☐ Courier	Thermometer ID:	NA

Shipping container/cooler uncompromised?	☒ Yes	☐ No	
Number of coolers/boxes received	1		
Custody seals intact on shipping container/cooler?	☐ Yes	☐ No	☒ Not Present
Custody seals intact on sample bottles?	☐ Yes	☐ No	☒ Not Present
Chain of Custody (COC) present?	☒ Yes	☐ No	
COC agrees with sample label(s)?	☒ Yes	☐ No	
COC properly completed	☒ Yes	☐ No	
Samples in proper containers?	☒ Yes	☐ No	
Sample containers intact?	☒ Yes	☐ No	
Sufficient sample volume for indicated test(s)?	☒ Yes	☐ No	
All samples received within holding time?	☒ Yes	☐ No	
Cooler temperature in compliance?	☒ Yes	☐ No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	☒ Yes	☐ No	
Water - Sample containers properly preserved	☒ Yes	☐ No	☐ N/A
Water - VOA vials free of headspace	☐ Yes	☐ No	☒ N/A
Trip Blanks received with VOAs	☐ Yes	☐ No	☒ N/A
Soil VOA method 5035 – compliance criteria met	☐ Yes	☐ No	☒ N/A
☐ High concentration container (48 hr)	☐ Low concentration EnCore samplers (48 hr)		
☐ High concentration pre-weighed (methanol -14 d)	☐ Low conc pre-weighed vials (Sod Bis -14 d)		
Special precautions or instructions included?	☐ Yes	☒ No	

Comments:

Signature:

Carleen Qualls

Date & Time:

08/09/2023 08:56:33

DateShipped:

Lab: Region 4 Lab

CarrierName:

Project Number: 23-0118

AirbillNo:

Cooler #:

[illegible]

Special Instructions:

Shipment for Case Complete? N

Samples Transferred From Chain of Custody #	
1	2
3	4
5	6
7	8
9	10
11	12
13	14
15	16
17	18
19	20
21	22
23	24
25	26
27	28
29	30
31	32
33	34
35	36
37	38
39	40
41	42
43	44
45	46
47	48
49	50
51	52
53	54
55	56
57	58
59	60
61	62
63	64
65	66
67	68
69	70
71	72
73	74
75	76
77	78
79	80
81	82
83	84
85	86
87	88
89	90
91	92
93	94
95	96
97	98
99	100

Analysis Key

Items/Reason	Relinquished by (Signature and Organization)	Date/Time	Received by (Signature and Organization)	Date/Time	Sample Condition Upon Receipt
	Abu Samay 16:40	08/08/23	K. Townsend	1640 8/8/23	16.2°C
				8/9/23	

DateShipped:

Lab: Region 4 Lab

CarrierName:

Project Number: 23-0119

AirbillNo:

Cooler #:

[illegible]

Special Instructions:		Shipment for Case Complete? N
		Samples Transferred From Chain of Custody #
Analysis Key		

Items/Reason	Relinquished by (Signature and Organization)	Date/Time	Received by (Signature and Organization)	Date/Time	Sample Condition Upon Receipt
	Asher Sampson	16:40 08/08/23	K. Townsend	16:40	8/8/23 16.2°C
				8/9/23	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4 Laboratory Services and Applied Science Division
980 College Station Road, Athens, Georgia 30605-2700

D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

August 24, 2023

MEMORANDUM

SUBJECT: FINAL Analytical Report
Project: 23-0119, Senatobia Back Acres Recon

FROM: Kristin Trapp
LSB Inorganic Chemistry Section Chief

THRU: Stacie Masters, Chief
Laboratory Services Branch

TO: Asher Sampong

Attached are the final results for the analytical groups listed below. This report shall not be reproduced except in full without approval of the Region 4 laboratory. These analyses were performed in accordance with the Laboratory Services Branch's Laboratory Operations and Quality Assurance Manual (LSB LOQAM) found at www.epa.gov/region4/sesd/asbsop. Any unique project data quality objectives specified in writing by the data requestor have also been incorporated into the data unless otherwise noted in the Report Narrative. Chemistry data have been verified based on the LSB LOQAM specifications and have been qualified by this laboratory if the applicable quality control criteria were not met. Verification is defined in Chapter 5 of the LSB LOQAM. For a listing of specific data qualifiers and explanations, please refer to the Data Qualifier Definitions included in this report. The reported results are accurate within the limits of the method(s) and are representative only of the samples as received by the laboratory.

Analyses Included in this report:

Method Used:

Accreditations:

Classical/Nutrient Analyses (CNA)

Demand
Solids

SM 5210B (Water)
USGS I-3765-85 (Water)

ISO
ISO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4 Laboratory Services and Applied Science Division

980 College Station Road, Athens, Georgia 30605-2700

D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Report Narrative for Work Order: E233203 Analysis: CNA

8/24/23 KT BOD: Due to the LSASD building being closed on 8/15/23 due to extreme temperature and humidity levels, the final DO of these samples was read on 8/16/23 (day 6). Samples are qualified with an H-8 and J qualifier, which states that the analytical holding time was exceeded.

Sample Disposal Policy

Due to limited space for long term sample storage, LSB's policy is to dispose of samples on a periodic schedule. Air samples collected in summa canisters will be disposed of 30 days following the issuance of this report. All other sample media including original samples, sample extracts and or digestates will be disposed of, in accordance with applicable regulations, 60 days from the date of this report.

This sample disposal policy does not apply to criminal samples which are held until the laboratory is notified by the criminal investigators that case development and litigation are complete.

These samples may be held in the laboratory's custody for a longer period of time. If samples require storage beyond the 60-day period, please contact the Sample Control Coordinator by e-mail at

R4SampleCustody@epa.gov.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4 Laboratory Services and Applied Science Division
980 College Station Road, Athens, Georgia 30605-2700

D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

SAMPLES INCLUDED IN THIS REPORT

Project: 23-0119, Senatobia Back Acres Recon

Sample ID	Laboratory ID	Matrix	Date Collected	Date Received
23-0119	E233203-01	Wastewater	8/8/23 11:20	8/9/23 14:00



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

DATA QUALIFIER DEFINITIONS

A	The analyte was analyzed in replicate. Reported value is an average value of the replicates.
H-8	Recommended analytical holding time exceeded
J	The identification of the analyte is acceptable; the reported value is an estimate.

ACRONYMS AND ABBREVIATIONS

CAS	Chemical Abstracts Service Note: Analytes with no known CAS identifiers have been assigned codes beginning with "E", the EPA ID as assigned by the EPA Substance Registry System (www.epa.gov/srs), or beginning with "R4-", a unique identifier assigned by the EPA Region 4 laboratory.
MDL	Method Detection Limit - The minimum concentration of a substance (an analyte) that can be measured and reported with a 99% confidence that the analyte concentration is greater than zero.
MRL	Minimum Reporting Limit - Analyte concentration that corresponds to the lowest demonstrated level of acceptable quantitation. The MRL is sample-specific and accounts for preparation weights and volumes, dilutions, and moisture content of soil/sediments.
TIC	Tentatively Identified Compound - An analyte identified based on a match with the instrument software's mass spectral library. A calibration standard has not been analyzed to confirm the compound's identification or the estimated concentration reported.

ACCREDITATIONS:

ISO	Accredited to ISO/IEC 17025:2017 and accreditation requirements for Forensic Science Testing Laboratories. Refer to the certificate and scope of accreditation FT-0330 at: http://www.epa.gov/aboutepa/about-region-4s-science-and-ecosystem-support-division-sesd
NR	Not accredited for this test.
DW	Accredited for conformance with ISO/IEC 17025:2017 and testing elements in the Fifth Edition of the Manual for the Certification of Laboratories Analyzing Drinking Water, EPA 815-R-05-004, 2005. Refer to the certificate and scope of accreditation AT-2628 at: http://www.epa.gov/aboutepa/about-region-4s-science-and-ecosystem-support-division-sesd
ISO/DW	Accredited to ISO/IEC 17025:2017 and accreditation requirements for Forensic Science Testing Labs, and conformance with ISO/IEC 17025:2017 and testing elements in the Manual for the Certification of Laboratories Analyzing Drinking Water.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Classical/Nutrient Analyses

Project: 23-0119, Senatobia Back Acres Recon

Sample ID: 23-0119

Lab ID: E233203-01

Station ID: EFF001

Matrix: Wastewater

Date Collected: 8/8/23 11:20

<i>CAS Number</i>	<i>Analyte</i>	<i>Results</i>	<i>Qualifiers</i>	<i>Units</i>	<i>MRL</i>	<i>Prepared</i>	<i>Analyzed</i>	<i>Method</i>
E1640606	BOD, 5 Day	17	A, J, H-8	mg/L	2.0	8/10/23 9:14	8/16/23 11:00	SM 5210B
E1642818	Total Suspended Solids	20		mg/L	5.0	8/11/23 8:45	8/11/23 8:45	USGS I-3765-85



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D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Classical/Nutrient Analyses (CNA) - Quality Control

US-EPA, Region 4, LSASD

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 2308022 - C SM5210 BOD										
Blank (2308022-BLK1)				Prepared: 08/10/23 Analyzed: 08/16/23						
SM 5210B										
BOD, 5 Day	U	2.0	mg/L							U
LCS (2308022-BS1)				Prepared: 08/10/23 Analyzed: 08/16/23						
SM 5210B										
BOD, 5 Day	210.80	2.0	mg/L	198.00		106	84.6-115.4			A
Batch 2308026 - C 2540 Solids										
Blank (2308026-BLK1)				Prepared & Analyzed: 08/11/23						
USGS I-3765-85										
Total Suspended Solids	U	5.0	mg/L							U
LCS (2308026-BS1)				Prepared & Analyzed: 08/11/23						
USGS I-3765-85										
Total Suspended Solids	102.10	5.0	mg/L	100.00		102	77.1-110			
LCS (2308026-BS2)				Prepared & Analyzed: 08/11/23						
USGS I-3765-85										
Total Suspended Solids	100.60	5.0	mg/L	100.00		101	77.1-110			
LCS (2308026-BS3)				Prepared & Analyzed: 08/11/23						
USGS I-3765-85										
Total Suspended Solids	104.40	5.0	mg/L	100.00		104	77.1-110			
LCS (2308026-BS4)				Prepared & Analyzed: 08/11/23						
USGS I-3765-85										
Total Suspended Solids	104.50	5.0	mg/L	100.00		104	77.1-110			
LCS Dup (2308026-BSD1)				Prepared & Analyzed: 08/11/23						
USGS I-3765-85										
Total Suspended Solids	107.80	5.0	mg/L	100.00		108	77.1-110	5.43	10	
Duplicate (2308026-DUP1)		Source: E233002-02		Prepared & Analyzed: 08/11/23						
USGS I-3765-85										
Total Suspended Solids	58.100	5.0	mg/L		57.900			0.345	10	



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Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Classical/Nutrient Analyses (CNA) - Quality Control

US-EPA, Region 4, LSASD

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 2308026 - C 2540 Solids

MRL Verification (2308026-PS1)

Prepared & Analyzed: 08/11/23

MRL-2

USGS I-3765-85

Total Suspended Solids	4.8000	5.0	mg/L	5.0000		96.0	57.1-130			U
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D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Notes and Definitions for QC Samples

- U The analyte was not detected at or above the reporting limit.
- A The analyte was analyzed in replicate. Reported value is an average value of the replicates.
- MRL-2 MRL verification for Non-Potable Water matrix



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D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

September 7, 2023

MEMORANDUM

SUBJECT: FINAL Analytical Report
Project: 23-0119, Senatobia Back Acres Recon

FROM: Kristin Trapp
LSB Inorganic Chemistry Section Chief

THRU: Stacie Masters, Chief
Laboratory Services Branch

TO: Asher Sampong

Attached are the final results for the analytical groups listed below. This report shall not be reproduced except in full without approval of the Region 4 laboratory. These analyses were performed in accordance with the Laboratory Services Branch's Laboratory Operations and Quality Assurance Manual (LSB LOQAM) found at www.epa.gov/region4/sesd/asbsop. Any unique project data quality objectives specified in writing by the data requestor have also been incorporated into the data unless otherwise noted in the Report Narrative. Chemistry data have been verified based on the LSB LOQAM specifications and have been qualified by this laboratory if the applicable quality control criteria were not met. Verification is defined in Chapter 5 of the LSB LOQAM. For a listing of specific data qualifiers and explanations, please refer to the Data Qualifier Definitions included in this report. The reported results are accurate within the limits of the method(s) and are representative only of the samples as received by the laboratory.

Analyses Included in this report:

Method Used:

Accreditations:

Classical/Nutrient Analyses (CNA)

Ammonia as N	EPA 350.1 (Water)	ISO
Ammonia/TKN	EPA 351.2 (Water)	ISO
Nitrate and/or Nitrite	EPA 353.2 (Water)	ISO/DW
Phosphorous	EPA 365.1 (Water)	ISO



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Sample Disposal Policy

Due to limited space for long term sample storage, LSB's policy is to dispose of samples on a periodic schedule. Air samples collected in summa canisters will be disposed of 30 days following the issuance of this report. All other sample media including original samples, sample extracts and or digestates will be disposed of, in accordance with applicable regulations, 60 days from the date of this report.

This sample disposal policy does not apply to criminal samples which are held until the laboratory is notified by the criminal investigators that case development and litigation are complete.

These samples may be held in the laboratory's custody for a longer period of time. If samples require storage beyond the 60-day period, please contact the Sample Control Coordinator by e-mail at R4SampleCustody@epa.gov.



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D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

SAMPLES INCLUDED IN THIS REPORT

Project: 23-0119, Senatobia Back Acres Recon

Sample ID	Laboratory ID	Matrix	Date Collected	Date Received
23-0119	E233203-01	Wastewater	8/8/23 11:20	8/9/23 14:00



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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980 College Station Road, Athens, Georgia 30605-2700

D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

DATA QUALIFIER DEFINITIONS

U The analyte was not detected at or above the reporting limit.

ACRONYMS AND ABBREVIATIONS

CAS Chemical Abstracts Service

Note: Analytes with no known CAS identifiers have been assigned codes beginning with "E", the EPA ID as assigned by the EPA Substance Registry System (www.epa.gov/srs), or beginning with "R4-", a unique identifier assigned by the EPA Region 4 laboratory.

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TIC Tentatively Identified Compound - An analyte identified based on a match with the instrument software's mass spectral library. A calibration standard has not been analyzed to confirm the compound's identification or the estimated concentration reported.

ACCREDITATIONS:

ISO Accredited to ISO/IEC 17025:2017 and accreditation requirements for Forensic Science Testing Laboratories.

Refer to the certificate and scope of accreditation FT-0330 at:
<http://www.epa.gov/aboutepa/about-region-4s-science-and-ecosystem-support-division-sesd>

NR Not accredited for this test.

DW Accredited for conformance with ISO/IEC 17025:2017 and testing elements in the Fifth Edition of the Manual for the Certification of Laboratories Analyzing Drinking Water, EPA 815-R-05-004, 2005.

Refer to the certificate and scope of accreditation AT-2628 at:
<http://www.epa.gov/aboutepa/about-region-4s-science-and-ecosystem-support-division-sesd>

ISO/DW Accredited to ISO/IEC 17025:2017 and accreditation requirements for Forensic Science Testing Labs, and conformance with ISO/IEC 17025:2017 and testing elements in the Manual for the Certification of Laboratories Analyzing Drinking Water.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Classical/Nutrient Analyses

Project: 23-0119, Senatobia Back Acres Recon

Sample ID: 23-0119

Lab ID: E233203-01

Station ID: EFF001

Matrix: Wastewater

Date Collected: 8/8/23 11:20

<i>CAS Number</i>	<i>Analyte</i>	<i>Results</i>	<i>Qualifiers</i>	<i>Units</i>	<i>MRL</i>	<i>Prepared</i>	<i>Analyzed</i>	<i>Method</i>
7664-41-7	Ammonia as N	0.56		mg/L	0.050	8/17/23 15:34	8/21/23 13:00	EPA 350.1
E17148461	Total Kjeldahl Nitrogen	4.7		mg/L	0.25	8/28/23 15:33	8/29/23 11:31	EPA 351.2
E701177	Nitrate/Nitrite as N	0.050	U	mg/L	0.050	8/30/23 9:39	8/30/23 17:28	EPA 353.2
7723-14-0	Total Phosphorus	0.90		mg/L	0.020	8/14/23 15:53	8/16/23 16:15	EPA 365.1



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Classical/Nutrient Analyses (CNA) - Quality Control

US-EPA, Region 4, LSASD

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 2308019 - C 350.1 Ammonia

Blank (2308019-BLK1)

Prepared: 08/17/23 Analyzed: 08/21/23

EPA 350.1

Ammonia as N	U	0.050	mg/L							U
--------------	---	-------	------	--	--	--	--	--	--	---

LCS (2308019-BS1)

Prepared: 08/17/23 Analyzed: 08/21/23

EPA 350.1

Ammonia as N	0.96100	0.050	mg/L	1.0030		95.8	90-110			
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Matrix Spike (2308019-MS2)

Source: E233203-01

Prepared: 08/17/23 Analyzed: 08/21/23

EPA 350.1

Ammonia as N	1.4980	0.050	mg/L	1.0030	0.56500	93.0	90-110			
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Matrix Spike Dup (2308019-MSD2)

Source: E233203-01

Prepared: 08/17/23 Analyzed: 08/21/23

EPA 350.1

Ammonia as N	1.6470	0.050	mg/L	1.0030	0.56500	108	90-110	9.48	10	
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MRL Verification (2308019-PS1)

Prepared: 08/17/23 Analyzed: 08/21/23

EPA 350.1

Ammonia as N	0.055000	0.050	mg/L	0.050000		110	70-130			MRL-2
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Batch 2308020 - C 351.2 TKN

Blank (2308020-BLK1)

Prepared: 08/28/23 Analyzed: 08/29/23

EPA 351.2

Total Kjeldahl Nitrogen	U	0.050	mg/L							U
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LCS (2308020-BS1)

Prepared: 08/28/23 Analyzed: 08/29/23

EPA 351.2

Total Kjeldahl Nitrogen	1.4070	0.050	mg/L	1.4600		96.4	90-110			
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Matrix Spike (2308020-MS2)

Source: E233203-01

Prepared: 08/28/23 Analyzed: 08/29/23

EPA 351.2

Total Kjeldahl Nitrogen	5.6500	0.25	mg/L	1.0030	4.7050	94.2	90-110			XM-1
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Matrix Spike Dup (2308020-MSD2)

Source: E233203-01

Prepared: 08/28/23 Analyzed: 08/29/23

EPA 351.2

Total Kjeldahl Nitrogen	5.8700	0.25	mg/L	1.0030	4.7050	116	90-110	3.82	20	XM-1
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 Region 4 Laboratory Services and Applied Science Division
 980 College Station Road, Athens, Georgia 30605-2700

D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Classical/Nutrient Analyses (CNA) - Quality Control

US-EPA, Region 4, LSASD

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 2308020 - C 351.2 TKN

MRL Verification (2308020-PS1)

Prepared: 08/28/23 Analyzed: 08/29/23

EPA 351.2

Total Kjeldahl Nitrogen	0.075000	0.050	mg/L	0.050000		150	70-130			MRL-2, QR-2
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Batch 2308033 - C 365.1 TPhos

Blank (2308033-BLK1)

Prepared: 08/14/23 Analyzed: 08/16/23

EPA 365.1

Total Phosphorus	U	0.010	mg/L							U
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LCS (2308033-BS1)

Prepared: 08/14/23 Analyzed: 08/16/23

EPA 365.1

Total Phosphorus	0.39300	0.010	mg/L	0.39300		100	90-110			
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Matrix Spike (2308033-MS4)

Source: E233203-01

Prepared: 08/14/23 Analyzed: 08/16/23

EPA 365.1

Total Phosphorus	1.3800	0.020	mg/L	0.50000	0.89800	96.4	90-110			
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Matrix Spike Dup (2308033-MSD4)

Source: E233203-01

Prepared: 08/14/23 Analyzed: 08/16/23

EPA 365.1

Total Phosphorus	1.3900	0.020	mg/L	0.50000	0.89800	98.4	90-110	0.722	10	
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MRL Verification (2308033-PS1)

Prepared: 08/14/23 Analyzed: 08/16/23

EPA 365.1

Total Phosphorus	0.0090000	0.010	mg/L	0.010000		90.0	70-130			MRL-2, U
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Batch 2308068 - C 353.2 NO3-NO2

Blank (2308068-BLK1)

Prepared & Analyzed: 08/30/23

EPA 353.2

Nitrate/Nitrite as N	U	0.050	mg/L							U
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LCS (2308068-BS1)

Prepared & Analyzed: 08/30/23

EPA 353.2

Nitrate/Nitrite as N	0.48090	0.050	mg/L	0.50000		96.2	90-110			
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4 Laboratory Services and Applied Science Division
980 College Station Road, Athens, Georgia 30605-2700

D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Classical/Nutrient Analyses (CNA) - Quality Control

US-EPA, Region 4, LSASD

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 2308068 - C 353.2 NO3-NO2

Matrix Spike (2308068-MS1)

Source: E233203-01

Prepared & Analyzed: 08/30/23

EPA 353.2

Nitrate/Nitrite as N	0.48340	0.050	mg/L	0.50000	U	96.7	90-110			
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Matrix Spike Dup (2308068-MSD1)

Source: E233203-01

Prepared & Analyzed: 08/30/23

EPA 353.2

Nitrate/Nitrite as N	0.49730	0.050	mg/L	0.50000	U	99.5	90-110	2.83	10	
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MRL Verification (2308068-PS1)

Prepared & Analyzed: 08/30/23

EPA 353.2

Nitrate/Nitrite as N	0.056200	0.050	mg/L	0.050000		112	70-130			MRL-2
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 4 Laboratory Services and Applied Science Division
980 College Station Road, Athens, Georgia 30605-2700

D.A.R.T. Id: 23-0119

Project: 23-0119, Senatobia Back Acres Recon - Reported by Kristin Trapp

Notes and Definitions for QC Samples

U	The analyte was not detected at or above the reporting limit.
MRL-2	MRL verification for Non-Potable Water matrix
QR-2	MRL verification recovery greater than upper control limits.
XM-1	Sample background/spike ratio higher than method evaluation criteria



State of Mississippi



WATER POLLUTION CONTROL PERMIT

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

THIS CERTIFIES

Senatobia, City of, Back Acres Subdivision
Pine Cove Road
Senatobia, MS
Tate County

has been granted permission to discharge wastewater in accordance with the effluent limitations, monitoring requirements and other conditions set forth in this permit. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

Mississippi Environmental Quality Permit Board

Krystal Rudolph

Mississippi Department of Environmental Quality

Issued/Modified: **November 12, 2021**

Expires: **September 30, 2024**

Permit No. MS0033162

Agency Interest # 13800

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Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Subject Item Inventory

Permit Number:MS0033162

Activity ID No.: PER20210001

Subject Item Inventory:

ID	Designation	Description
AI13800	MS0033162	
RPNT1	MS0033162-001	Outfall 001 (Domestic Wastewater)

Receiving Stream Relationships:

Subject Item	Relationship	Receiving Stream
RPNT1 Outfall 001 (Domestic Wastewater)	Discharges Into	Unnamed Creek
	Then Into	Senatobia Creek

KEY

ACT = Activity

AREA = Area

CONT = Control Device

IA = Insignificant Activity

MAFO = Animal Feeding Operation

RPNT = Release Point

WDPT = Withdrawal Point

AI = Agency Interest

CAFO = Concentrated Animal Feeding Operation

EQPT = Equipment

IMPD = Impoundment

PCS = PCS

TRMT = Treatment

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Subject Item: Outfall 001 (Domestic Wastewater)

RPNT0000000001: MS0033162-001

Such discharges shall be limited and monitored by the permittee as specified below:

Parameter	Discharge Limitations							Monitoring Requirements		
	Quantity / Loading Average	Quantity / Loading Maximum	Quantity / Loading Units	Quality / Conc. Minimum	Quality / Conc. Average	Quality / Conc. Maximum	Quality / Conc. Units	Frequency	Sample Type	Which Months
<i>Ammonia Nitrogen, Total (as N) Effluent</i>	1.7 Maximum Monthly Average	2.5 Daily Maximum	pounds per day	*****	2 Maximum Monthly Average	3 Daily Maximum	mg/L	Quarterly	Grab Sampling	Jan-Dec
<i>Chlorine, total residual Effluent</i>	*****	*****	*****	*****	0.011 Maximum Monthly Average	0.019 Daily Maximum	mg/L	Weekly	Grab Sampling	Jan-Dec
<i>E coli Effluent</i>	*****	*****	*****	*****	126 Maximum Monthly Average	410 Daily Maximum	# of colonies/100 ml	Quarterly	Grab Sampling	Jan-Dec
<i>Flow Effluent</i>	0.099 Maximum Monthly Average	Report Daily Maximum	Million Gallons per Day	*****	*****	*****	*****	Weekly	Instantaneous Sampling	Jan-Dec
<i>Nitrogen (Total) Effluent</i>	Report Maximum Monthly Average	Report Daily Maximum	pounds per day	*****	Report Maximum Monthly Average	Report Daily Maximum	mg/L	Quarterly	Grab Sampling	Jan-Dec
<i>Oxygen Demand, biochemical, 5-day (20 degrees C) Effluent</i>	25 Maximum Monthly Average	37 Daily Maximum	pounds per day	*****	30 Maximum Monthly Average	45 Daily Maximum	mg/L	Quarterly	Grab Sampling	Jan-Dec
<i>Oxygen, dissolved Effluent</i>	*****	*****	*****	6.0 Minimum	*****	*****	mg/L	Quarterly	Grab Sampling	Jan-Dec
<i>pH Effluent</i>	*****	*****	*****	6.0 Minimum	*****	9.0 Maximum	SU	Quarterly	Grab Sampling	Jan-Dec

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Subject Item: **Outfall 001 (Domestic Wastewater)**

RPNT0000000001: **MS0033162-001**

Such discharges shall be limited and monitored by the permittee as specified below:

Parameter	Discharge Limitations							Monitoring Requirements		
	Quantity / Loading Average	Quantity / Loading Maximum	Quantity / Loading Units	Quality / Conc. Minimum	Quality / Conc. Average	Quality / Conc. Maximum	Quality / Conc. Units	Frequency	Sample Type	Which Months
<i>Phosphorus (Total) Effluent</i>	Report Maximum Monthly Average	Report Daily Maximum	pounds per day	*****	Report Maximum Monthly Average	Report Daily Maximum	mg/L	Quarterly	Grab Sampling	Jan-Dec
<i>Solids (Total Suspended) Effluent</i>	25 Maximum Monthly Average	37 Daily Maximum	pounds per day	*****	30 Maximum Monthly Average	45 Daily Maximum	mg/L	Quarterly	Grab Sampling	Jan-Dec

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Facility Requirements

Permit Number:MS0033162

Activity ID No.: PER20210001

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AI0000013800 (MS0033162):

Limitation Requirements:

Condition No.	Parameter	Condition
L-1		The effluent shall not cause an accumulation of solids or sewage sludges in the receiving stream. [11 Miss. Admin. Code Pt. 6,R. 2.2.A(2).]
L-2		There shall be no discharge of floating solids or visible foam in other than trace amounts. [11 Miss. Admin. Code Pt. 6, R. 2.2.A(2).]
L-3		The discharges shall not cause the occurrence of a visible sheen on the surface of the receiving waters. [11 Miss. Admin. Code Pt. 6, R. 2.2.A(2).]
L-4		Samples taken in compliance with the monitoring requirements specified in this permit shall be taken at the nearest accessible point after final treatment but prior to mixing with the receiving stream or as otherwise specified in this permit. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(28).]

Record-Keeping Requirements:

Condition No.	Condition
R-1	Recording of Results For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including: (1) The exact place, date, and time of sampling; (2) The dates the analyses were performed; (3) The person(s) who performed the analyses; (4) The analytical techniques, procedures or methods used; and (5) The results of all required analyses. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(29)(a).]

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Facility Requirements

Permit Number:MS0033162

Activity ID No.: PER20210001

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AI0000013800 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-1	Reporting Monitoring results obtained during the previous reporting period shall be summarized and reported on a Discharge Monitoring Report (DMR). DMR data must be submitted electronically using the MDEQ NetDMR system NO LATER THAT THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. DMRs and all other reports required herein, shall be signed in accordance with 11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(15)(c)(1). of the Mississippi Wastewater Regulations. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(15)c(1)., 40 CFR 122.21(1)(4)(i)]
S-2	Noncompliance Notification - Twenty-Four Hour Reporting (1) The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance. (2) The following shall be included as information which must be reported within 24 hours under this paragraph. (i) Any unanticipated bypass which exceeds any effluent limitation in the permit. (ii) Any upset which exceeds any effluent limitation in the permit. (iii) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours. (iv) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph (1) of this section if the oral report has been received within 24 hours. The Executive Director may waive the written report on a case-by-case basis for reports under paragraph (1) of this section if the oral report has been received within 24 hours. All reports required by this condition which are submitted after December 20, 2025, shall be submitted by the permittee electronically as instructed by MDEQ. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(29)(e)., 40 CFR 122.41.(1)(6)]

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Facility Requirements

Permit Number:MS0033162

Activity ID No.: PER20210001

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AI0000013800 (continued):

Submittal/Action Requirements:

Condition No.	Condition
S-3	Noncompliance Notification - Other Noncompliance The permittee shall report all instances of noncompliance not reported under the twenty-four hour reporting requirements, at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the same information as is required under the twenty-four hour reporting requirements contained in this permit. All reports required by this condition which are submitted after December 20, 2025, shall be submitted by the permittee electronically as instructed by MDEQ. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(29)(f)., 40 CFR 122.41.(1)(7)]
S-4	Noncompliance Notification - Other Information Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(29)(g).]
S-5	Bypassing -Notice Anticipated bypass- If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass. Unanticipated bypass- The permittee shall submit notice of an unanticipated bypass as required by the twenty-four hour reporting requirements set forth in this permit. All reports required by this condition which are submitted after December 20, 2025, shall be submitted by the permittee electronically as instructed by MDEQ. [40 CFR 122.41(m)(3)(i, ii)]
S-6	Expiration of Permit At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit. [11 Miss. Admin. Code Pt. 6, R. 1.1.5.B(1).]

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Facility Requirements

Permit Number:MS0033162

Activity ID No.: PER20210001

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AI0000013800 (continued):

Narrative Requirements:

Definitions:

Condition No.	Condition
T-1	Definitions: General The permittee shall refer to 11 Miss. Admin. Code Pt. 6, R. 1.1.1.A for definitions of any permit term not specified in this permit. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A.]
T-2	Definitions: Monthly Average "Monthly Average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for E coli bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the geometric mean for E coli bacteria, the value one (1) shall be substituted for sample results of zero. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A(44).]
T-3	Definitions: Daily Discharge "Daily discharge" means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily average" is calculated as the average measurement of the discharge of the pollutant over the day. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A(15).]
T-4	Definitions: Daily Maximum "Daily maximum" means the highest "daily discharge" over a calendar month. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A(16).]
T-5	Definitions: Toxic Pollutants "Toxic pollutants" means any pollutant listed as toxic under Section 307(a)(1) or, in the case of "sludge use or disposal practices", any pollutant identified in regulations implementing Section 405(d) of the Clean Water Act. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A(71).]
T-6	Definitions: Hazardous Substances "Hazardous substances" are defined in 40 CFR 116.4. [40 CFR 116.4]

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Facility Requirements

Permit Number:MS0033162

Activity ID No.: PER20210001

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AI0000013800 (continued):

Narrative Requirements:

Definitions:

Condition No.	Condition
T-7	Definitions: Weekly Average "Weekly average" means the average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week. The weekly average for E coli bacteria is the geometric mean of all "daily discharges" measured in a calendar week. In computing the geometric mean for E coli bacteria, one (1) shall be substituted for sample results of zero. For self-monitoring purposes, the value to be reported is the single highest weekly average computed during a calendar month. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A(86).]
T-8	Definitions: Quarterly Average "Quarterly Average" means the average of "daily discharges" over a three month period, calculated as the sum of all "daily discharges" measured during the quarter divided by the number of "daily discharges" measured during the quarter. The quarterly average for E coli bacteria is the geometric mean of "daily discharges" measured during the quarter. In computing the geometric mean for E coli bacteria, the value one (1) shall be substituted for sample results of zero. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A(61).]
T-9	Definitions: Quarterly Maximum "Quarterly Maximum" means the highest "daily discharge" measured over a three-month period. [11 Miss. Admin. Code Pt. 6, R.1.1.1.A(62).]
T-10	Definitions: Maximum Monthly Average Maximum Monthly Average means the highest "monthly average" over a monitoring period. [40 CFR 122]
T-11	Definitions: Yearly Average "Yearly Average" means the average of "daily discharges" over a calendar year, calculated as the sum of all "daily discharges" measured during the calendar year divided by the number of "daily discharges" measured during the calendar year. The yearly average for E coli bacteria is the geometric mean of "daily discharges" during the calendar year. In computing the geometric mean for E coli bacteria, the value one (1) shall be substituted for sample results of zero. [11 Miss. Admin. Code Pt. 6, R.1.1.1.A(87).]

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Facility Requirements

Permit Number:MS0033162

Activity ID No.: PER20210001

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AI0000013800 (continued):

Narrative Requirements:

Definitions:

Condition No.	Condition
T-12	Definitions: Yearly Maximum "Yearly Maximum" means the highest "daily discharge" measured over a calendar year. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A(88).]
T-13	Definitions:"Submitted" means the document is postmarked on or before the applicable deadline, except as otherwise specified. [11 Miss. Admin. Code Pt. 6, R. 1.1.1.A(67).]
Condition No.	Condition
T-14	"The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule: Effluent limits have been developed such that the waste treatment system should protect water quality. However, this permit is subject to modifications if future evidence, monitoring results, or nuisance conditions indicate that a higher degree of treatment is required to maintain water quality.The discharge from this facility shall cease and connection made to a regional sewer system when the sewer system is available in the area. At that time the discharge from the system shall be terminated.In accordance with the Municipal and Domestic Water and Wastewater System Operator's Certification Act of 1986, this treatment facility must be operated by persons who are certified as qualified to operate the facility. The Office of Pollution Control must concur with plans and specifications for the installation or modification of the wastewater treatment facility and sewer collection system, if applicable, prior to the commencement of construction. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(9).]"
T-15	Within 14 days after either an interim or final date of compliance specified by this permit, the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(10).]
T-16	Representative Sampling Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(28)(e).]

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Facility Requirements

Permit Number:MS0033162

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-17	Reporting If the results for a given sample analysis are such that any parameter (other than E coli) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in calculating an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall report "NODI = B" on the DMR. For E coli, a value of 1.0 shall be used in calculating the geometric mean. If the resulting E coli mean value is 1.0, the permittee shall report "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement. [11 Miss. Admin. Code Pt. 6, Ch. 1, Subch. 2.]
T-18	Reporting If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(15)(c)(2).]
T-19	Reporting Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(15)(c)(3).]
T-20	Test Procedures Test procedures for the analysis of pollutants shall include those set forth in 40 CFR 136 or alternative procedures approved and/or promulgated by EPA. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(30).]
T-21	Records Retention All records and results of monitoring activities required by this permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(29)(a).]

Permit to Discharge Wastewater in Accordance with National Pollutant Discharge Elimination System

Senatobia, City of, Back Acres Subdivision

Facility Requirements

Permit Number:MS0033162

Activity ID No.: PER20210001

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-22	Falsifying Reports Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(29)(d).]
T-23	Duty to Comply The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(2).]
T-24	Proper Operation, Maintenance and Replacement 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. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems that are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(18).]
T-25	Duty to Mitigate The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit that has a reasonable likelihood of adversely affecting human health or the environment. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(19).)]
T-26	Bypassing The permittee shall comply with the terms and conditions regarding bypass found in 40 CFR 122.41(m). [40 CFR 122.41(m)]

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Condition No.	Condition
T-27	Bypassing - Definitions "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production. [40 CFR 122.41(m)]
T-28	Bypassing - Bypass not exceeding limitations The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the notice and prohibition provisions of the bypass requirements in this permit. [40 CFR 122.41(m)]
T-29	Bypassing- Prohibition of Bypass (1) Bypass is prohibited, and the Commission may take enforcement action against a permittee unless: (i) Bypass was unavoidable to prevent loss of life, personal injury, or sever property damage. (ii) There was no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgement to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and (iii) The permittee submitted notices as required under the Twenty-Four Hour reporting requirements set forth in this permit. (2) The Commission may approve an anticipated bypass, after considering its adverse affects, if the Commission determines that it will meet the three conditions listed above in paragraph (1) of this permit condition. [40 CFR 122.41(m)]
T-30	Upsets The permittee shall meet the conditions of 40 CFR 122.41(n) regarding "Upsets" and as in the upset requirements of this permit. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(27).]

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-31	Upsets- Definition "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(27).]
T-32	Upsets - Effect of an Upset An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the "conditions necessary for demonstration of upset" requirements of this permit are met. Any determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, shall not constitute final administrative action subject to judicial review. [11 Miss. Admin. Code Pt. 6, R.1.1.4.A(27).]
T-33	Upsets - Conditions necessary for demonstration of upset A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that: (1) An upset occurred and that the permittee can identify the cause(s) of the upset; (2) The permitted facility was at the time being properly operated; (3) The permittee submitted notice of the upset as required in 40 CFR 122.41(L)(6)(ii)(B)(24-hour notice of noncompliance); and (4) The permittee complied with any remedial measures required under 40 CFR 122.41(d) (Duty to Mitigate). [11 Miss. Admin. Code Pt. 6, R.1.1.4.A(27).]
T-34	Upsets - Burden of proof In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(27).]

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-35	Removed Substances Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(21).]
T-36	Power Failures If electric power is required, in order to maintain compliance with the conditions and prohibitions of the permit, the permittee shall either: (1) Provide an alternative power source to operate the wastewater control facilities; or, if such alternative power source is not in existence, and no date for its implementation appears in the permit, (2) Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(22).]
T-37	Inspection and Entry The permittee shall allow any authorized Commission representative to enter the permittee's premises at any reasonable time, to have access to and copy any applicable records, to inspect process facilities, treatment works, monitoring methods or equipment or to take samples, as authorized by Section 49-17-21 of the Code. In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night. Follow-up investigations subsequent to the conclusion of the emergency event shall be conducted at reasonable times. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(17).]
T-38	Transfer of Ownership or Control This permit is not transferable to any person without proper modification of this permit following procedures found in [11 Miss. Admin. Code Pt. 6, R. 1.1.5.C.]
T-39	Signatory Requirements All applications, reports, or information submitted to the Permit Board shall be signed and certified. [11 Miss. Admin. Code Pt. 6, R. 1.1.2.C.]

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Narrative Requirements:

Condition No.	Condition
T-40	Signatory Requirements - Application Signatures All permit applications shall be signed as follows: (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (i) a president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy - or decision-making function for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official. [11 Miss. Admin. Code Pt. 6, R. 1.1.2.C.]
T-41	Signatory Requirements -Reports and Other Information All reports required by the permit and other information requested by the Permit Board shall be signed by a person described by the application signature requirements in this permit or by a duly authorized representative of that person. A person is a duly authorized representative only if: (1) The authorization is made in writing by a person described by the application signature requirements; (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and (3) The written authorization is submitted to the Permit Board. [11 Miss. Admin. Code Pt. 6, R. 1.1.2.C.]

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-42	Signatory Requirements - Changes to Authorization If an authorization under the signatory requirements of this permit is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the signatory requirements of this permit must be submitted to the Permit Board prior to or together with any reports, information, or applications. [11 Miss. Admin. Code Pt. 6, R. 1.1.2.C.]
T-43	Signatory Requirements - Certification Any person signing a document under the signatory requirements stated in this permit shall make the following certification: "I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations." [11 Miss. Admin. Code Pt. 6, R. 1.1.2.C.]
T-44	Availability of Records Except for information deemed to be confidential under the Mississippi Code Ann. 49-17-39 and 40 CFR 123.41, file information relating to this permit shall be made available for public inspection and copying during normal business hours at the office of the Department of Environmental Quality in Jackson, Mississippi. Written request must be provided in accordance with policies developed by the Commission and must state, specifically, records proposed for review, date proposed for review and copying requirements. [11 Miss. Admin. Code Pt. 6, R. 1.1.3.E.]
T-45	Duty to Provide Information The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. The permittee shall also furnish to the Permit Board upon request, copies of records required to be kept by the permit. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(16).]

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-46	Toxic Pollutants The permittee shall comply with any toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) established under Section 307(a) of the Federal Water Pollution Control Act. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(26).]
T-47	Toxic Pollutants Notification Requirements The permittee shall comply with the applicable provisions of 40 CFR 122.42. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(26).]
T-48	Civil and Criminal Liability (1) Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law. (2) Except as provided in permit conditions on "Bypassing" and "Upsets", nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance. (3) It shall not be the defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(24).]
T-49	Oil and Hazardous Substance Liability Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions under Mississippi Law pertaining to transportation, storage, treatment, or spillage of oil or hazardous substances. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(23).]
T-50	Property Rights The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations. [11 Miss. Admin. Code Pt. 6, R. 1.1.5. E.]

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-51	Severability The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(25).]
T-52	Protection of Confidential Information (1) Pursuant to Miss. Code Ann. ' 49-17-39 and 40 CFR 123.41, the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. ' 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality. [11 Miss. Admin. Code Pt. 6, R. 1.1.3.F.]
T-53	Protection of Confidential Information- continued (2) A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to part (1) of this requirement, shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi. [11 Miss. Admin. Code Pt. 6, R. 1.1.3.F.]
T-54	Protection of Confidential Information- continued (3) Upon determination by the Commission that information submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. ' 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed. [11 Miss. Admin. Code Pt. 6, R. 1.1.3.F.]

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-55	Spill Prevention and Best Management Plans Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State and not subject to Mississippi Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall provide secondary containment as found in 40 CFR 112 or equivalent protective measures such as trenches or waterways which would conduct any tank releases to a permitted treatment system or sufficient equalization or treatment capacity needed to prevent chronic/acute pollution impact. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(12)(a).]
T-56	Reopener Clause This permit shall be modified, or alternately, revoked and reissued, to comply with any applicable effluent standard, limitation or storm water regulation issued or approved under Section 301(b)(2)(C), and (D), 304(b)(2), 307(a)(2) and 402(p) of the Federal Water Pollution Control Act if the effluent standard, limitation or regulation so issued or approved: 1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or 2. Controls any pollutant not limited in the permit. 3. This permit shall be modified to reflect any additional or otherwise more stringent limitations and additional monitoring as determined to be necessary by the results of a Completed TMDL. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.F(1).]
T-57	Closure Requirements Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall provide a Closure Plan to the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises or permanently disposed of on site such that no potential environmental hazard to the waters of the State will be presented. Closure plan(s) submitted to and approved by Mississippi Department of Environmental Quality for compliance with other environmental regulations will satisfy the closure requirements for those items specifically addressed in the closure plan(s) as long as the closure does not present a potential for environmental hazard to waters of the State. [11 Miss. Admin. Code Pt. 6, R. 1.1.4.A(11).]

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AI0000013800 (continued):

Narrative Requirements:

Condition No.	Condition
T-58	Permit Actions The permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a modification of planned changes or anticipated noncompliance, does not stay any permit condition. [11 Miss. Admin. Code Pt. 6, R. 1.1.5.C(5).]

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RPNT0000000001 (MS0033162-001) Outfall 001 (Domestic Wastewater):

Submittal/Action Requirements:

Condition	
No.	Condition
S-1	The Permittee shall submit analytical results on an annual Discharge Monitoring Report (DMR): Due annually by the 28th of January. [11 Miss. Admin. Code Pt. 6, Ch. 1, Subch. 1. IV.A(15)c]

GENERAL INFORMATION

Senatobia, City of, Back Acres Subdivision
Pine Cove Road
Senatobia, MS
Tate County

Alternate/Historic Identifiers

ID	Alternate/Historic Name	User Group	Start Date	End Date
13800	New Image Utility Company	Historic Site Name	3/10/1992	10/5/2021
MS0033162	New Image Utility Company, Back Acres Subdivision	Water - NPDES	7/30/1997	7/31/2002
MS0033162	New Image Utility Company, Back Acres Subdivision	Water - NPDES	9/16/2004	8/31/2009
MS0033162	New Image Utility Company, Back Acres Subdivision	Water - NPDES	1/4/2010	10/15/2014
MS0033162	New Image Utility Company, Back Acres Subdivision	Water - NPDES	10/15/2014	9/30/2019
	Branch	Branches Group - Municipal	7/18/2017	
MS0033162	New Image Utility Company, Back Acres Subdivision	Water - NPDES	10/25/2019	9/30/2024
13800	City of Senatobia, City, Back Acres Subdivision	Official Site Name	10/5/2021	

Basin: Yazoo River Basin

Location Description:Copy of 001

Relevant Documents: Short Form D