



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

ELECTRONIC EMAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

The Honorable Aelicia Thomas
Mayor of the City of Rosedale
304 Court Street
Rosedale, Mississippi 38769
mayorthomas2020@gmail.com

Re: Compliance Evaluation Inspection Report
NPDES Permit No. MS0020630

Dear Mayor Thomas:

The U.S. Environmental Protection Agency, Region 4 conducted a Compliance Evaluation Inspection (CEI) of the City of Rosedale Publicly Owned Treatment Works (POTW) on September 22, 2021. The objective of the inspection was to assess the permittee's compliance with the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) permit. The inspection results have been summarized in the enclosed CEI Report.

The EPA appreciates your cooperation. If you have specific questions about the inspection report, please contact Brad Ammons at (404) 562-9769 or via email at ammons.brad@epa.gov. Please verify receipt of this letter and report by emailing Mr. Ammons at the email address provided.

Sincerely,

JAIRO
CASTILLO

Digitally signed by JAIRO
CASTILLO
Date: 2021.11.18
08:32:06 -05'00'

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

Enclosure

cc: Michelle Clark
Mississippi Department of Environmental Quality

United States Environmental Protection Agency Region 4
Enforcement and Compliance Assurance
Division
Water Enforcement Branch
61 Forsyth Street, SW
Atlanta, Georgia 30303



Compliance Evaluation Inspection Report

Rosedale POTW
NPDES Permit: MS0020630
Project No. CV-MS0020630-092221

D Street, Martin Luther King Extended
Rosedale, MS 38769

Inspection Date: September 22, 2021

Inspectors:
Brad Ammons, EPA Region 4
Dennis Sayre, EPA Region 4
William Joyner, EPA Region 4

Inspection Report Prepared by: Brad Ammons

November 9, 2021

Title and Approval Sheet

Title: Compliance Evaluation Inspection City of Rosedale POTW

Approving Official:

JAIRO
CASTILLO

Digitally signed by JAIRO
CASTILLO
Date: 2021.11.18
08:32:46 -05'00'

11/18/2021

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

Date

Enforcement Officer:

MICHAEL AMMONS

Digitally signed by
MICHAEL AMMONS
Date: 2021.11.18
10:51:19 -05'00'

11/18/2021

Brad Ammons, Environmental Engineer
Wastewater Enforcement Section
Water Enforcement Branch

Date

COMPLIANCE EVALUATION INSPECTION REPORT
City of Rosedale, Project No. CV-MS0020630-092221

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COMPLIANCE EVALUATION INSPECTION REPORT
City of Rosedale, Project No. CV-MS0020630-092221

1. INTRODUCTION

The U.S. Environmental Protection Agency, Region 4 conducted a Compliance Evaluation Inspection (CEI) at the Rosedale Publicly Owned Treatment Works (POTW) (Facility) located at D Street, Martin Luther King Extension in Rosedale, Mississippi on September 22, 2021. The inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. This narrative report and attachments present the results of the inspection.

2. PARTICIPANTS

<u>Name</u>	<u>Position</u>	<u>Phone Number</u>
Brad Ammons	EPA Inspector	404-562-9769
Dennis Sayre	EPA Inspector	404-562-9756
William Joyner	EPA Inspector	404 562-8795
Jacob Lunn	EPA Employee	202-564-2141
Eddie Smith	City of Rosedale	662-588-0841
Dwayne Griffin	City of Rosedale	662-588-4662

3. FACILITY DESCRIPTION

The Facility discharges treated domestic wastewater collected from the City of Rosedale. There are approximately 2,400 citizens in the City. The treatment system is composed of two lagoons, one main treatment facultative lagoon and a polishing lagoon. The outfall weir is on the west side of the Facility.

4. INSPECTION PROCEDURES

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

5. FINDINGS AND CONCLUSIONS

- Outfall 001 is required to be monitored quarterly for all parameters except for Total Residual Chlorine (TRC) and flow, which are required to be monitored weekly, as in compliance with the permit. Condition number S-1 of the National Pollutant Discharge Elimination System (NPDES) permit requires the Facility to submit the data annually.
- The City uses chlorine tablets for disinfection when there are odor complaints. There is a shortage of chlorine tablets due to a supply chain disruption, potentially caused by the COVID-19 pandemic. The City is down to its last case of chlorine tablets.
- The City uses a contract laboratory (Waypoint Analytical Laboratory) for analysis of all parameters in the permit.
- The Facility was discharging during this inspection and there were no chlorine tablets in the outfall structure to disinfect the effluent.
- The plant operator (Mr. Dwayne Griffin) conducts the sampling and inputs the DMRs into the electronic DMR reporting system. The Mayor then electronically signs the DMRs.

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Figure 1. Facility outlay map (Source: Google Maps).

6. PERMIT

The NPDES permit number MS0020630 (Permit) became effective on March 26, 2020, and the Permit expires on February 28, 2025.

Pollutants of interest in the Permit include Ammonia Nitrogen, TRC, E. Coli, Total Nitrogen, 5-day Biochemical Oxygen Demand (BOD₅), Dissolved Oxygen, pH, Total Phosphorus and Total Suspended Solids (TSS). The Facility is permitted to discharge treated wastewater into Drainage Ditch #3. Ditch #3 discharges into Lane Bayou. The Permit requires quarterly sampling for Ammonia Nitrogen, E. Coli, Total Nitrogen, BOD₅, Dissolved Oxygen, pH, Total Phosphorus and TSS. The Permit requires weekly sampling for TRC and Flow. Finally, the Permit requires annual sampling for BOD₅ and TSS percent removal and annual reporting of DMR monitoring data via the electronic NetDMR system. The DMR data for each year is due by January 28 of the following year.

7. RECORDS AND REPORTS

The annual DMR for 2020 was reviewed, as well as the analytical results and the chain of custody forms for 2020. A review of EPA's Enforcement and Compliance History Online (ECHO) website shows the Facility to be in Significant Non-compliance (SNC) for DMR non-receipt at Outfall 001 for 4th quarter 2018 and 4th quarter 2020. Table 1 below is a summary of missing DMRs in ECHO.

Table 1. DMR non-receipt from July 1, 2018, to June 30, 2021

Outfall	Parameter	Monitoring Frequency	Missing DMR
001	Fecal Coliform	Quarterly	4 th quarter 2018 (missing DMR)
001	All parameters	Quarterly	4 th quarter 2020 (missing DMR)

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However, a data pull of the underlying Integrated Compliance Information System (ICIS) database shows the only missing data currently is the BOD₅ % Removal, TSS % removal, pH and Dissolved Oxygen for 2020. The City should follow up with its laboratory contractor regarding the above missing effluent data.

In addition, the ECHO database shows the following NPDES permit effluent limit exceedances (see Table 2. below).

Table 2. Effluent limit exceedances from July 1, 2018 to June 30, 2021

Outfall	Parameter	Monitoring Frequency	Effluent Exceedance
001	BOD ₅	Quarterly – reported Annually	4 th Quarter 2018 (2000% over the limit); 4 th Quarter 2019 (600% over the limit)
001	Total Ammonia Nitrogen	Quarterly – reported Annually	4 th Quarter 2018 (98% over the limit); 4 th Quarter 2019 (184% over the limit)

8. SAMPLING

Mr. Griffin collects the samples and sends the samples to Waypoint Analytical Laboratory for analysis of all parameters. Records reviewed included chain of custody and analytical results and found to be satisfactory.

9. DISCUSSION

As discussed above, the City should contact Waypoint Analytical Laboratory to get records that are missing in the ICIS database and input them using the electronic DMR reporting system.

10. ATTACHMENTS

1. EPA ECHO printout

END REPORT

Customize Report		Facility Summary			Facility/System Characteristics		Enforcement and Compliance		Environmental Conditions		Pollutants		Community												
CWA (Source ID: MS0020630)					07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19	07/01-09/30/19	10/01-12/31/19	01/01-03/31/20	04/01-06/30/20	07/01-09/30/20	10/01-12/31/20	01/01-03/31/21	04/01-06/30/21	07/01-09/30/21								
Facility-Level Status		Significant/Category I Noncompliance		Significant/Category I Noncompliance		Significant/Category I Noncompliance		Significant/Category I Noncompliance		Significant/Category I Noncompliance		Violation Identified		Violation Identified		Violation Identified		Violation Identified		Significant/Category I Noncompliance		Significant/Category I Noncompliance		Under Review	
Quarterly Noncompliance Report History		Failure to Report DMR - Not Received		Failure to Report DMR - Not Received		Failure to Report DMR - Not Received		Failure to Report DMR - Not Received		Failure to Report DMR - Not Received		Failure to Report DMR - Not Received		Reportable Noncompliance		Reportable Noncompliance		Reportable Noncompliance		Reportable Noncompliance		Failure to Report DMR - Not Received		Failure to Report DMR - Not Received	
Pollutant		Disch Point		Mon Loc		Freq		Effluent limit exceedances																	
► CWA		BOD, 5-day, 20 deg. C E		001 - Y		Effluent Gross		NMth		2000%		600%													
► CWA		Nitrogen, ammonia total [as N] E		001 - Y		Effluent Gross		NMth		98%		184%													
Late or Missing Discharge Monitoring Report (DMR) Measurements		Missing DMRs																							
Counts of Missing DMR Measurements		2												51											

Informal Enforcement Actions (5 Years)