



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
NASHVILLE ENVIRONMENTAL FIELD OFFICE
711 R.S. GASS BLVD.
NASHVILLE, TENNESSEE 37216

February 10, 2015

Mr. Clayton Gray
President, Laguardo Utility District
355 Woods Ferry Road
Lebanon, TN 37087

RE: **Sanitary Survey Letter**
Laguardo Utility District
PWSID# 0000394, Wilson County

Dear Mr. Gray:

On December 16 and 17, 2014, staff from the Division of Water Resources (division) met with Laguardo Utility District (Laguardo) personnel to conduct an on-site inspection and file review of the water system. This on-site inspection and file review constituted a sanitary survey. The deficiencies noted in the inspection and their relative number of points deducted is reflected in the score as a percentage of total points possible. For water systems which have treatment and distribution there are a total of 599 points available. In the case of Laguardo, 8 points were deducted. This evaluation resulted in Laguardo earning a score of **ninety-eight** percent, which places it in the "**Approved**" category of public water systems in Tennessee. The division would like to thank water system personnel for being both professional and courteous during the sanitary survey process.

The following areas of non-compliance must be addressed and require a written response within forty-five (45) days of receipt of this letter. Please outline in your response the measures that will be performed to correct each of the deficiencies noted. Please send your response letter and the requested information to the address at the top of this letter.

1. During a review of the Laguardo's turbidity records, it was determined that personnel are not reporting turbidity accurately on the Monthly Operations Report (MOR). According to Laguardo personnel, the information reported on the MOR only consists of information collected from grab sampling for turbidity. While turbidity is continuously monitored and recorded by inline equipment this data was not considered when reporting to the division. Personnel must ensure that all data is considered when reporting to the

division on the MOR or any of the accompanying forms. It should be noted that all turbidity data reviewed by division staff during the survey was within acceptable limits.

2. During a review of Laguardo's turbidimeter calibration records division staff noted that that the 2100N benchtop turbidimeter was not being calibrated every ninety (90) days as required.

The following comments provide an overview of areas that were reviewed during the survey, and provide assistance in meeting the division's rules and regulations. These comments do not reflect deficient areas, and therefore do not require a written response:

1. An onsite inspection of the water system's water storage tanks indicated that they were well maintained and in good shape to meet their purpose. However, the Cairo Bend Road tank had a standing dead tree near the tank that could fall and damage the tank. The division recommends Laguardo remove the tree to ensure it does not damage the tank.
2. During the survey, the division approved the Laguardo Utility District (Mr. Michael DeArmond) to perform the following analyses and obtained the following results:
 - a. pH, 7.4 (finished water)
 - b. Alkalinity, 218 mg/L (finished water)
 - c. Hardness, 140 (finished water)
 - d. Chlorine, 2.53 mg/L (finished water)
 - e. Iron, 0.01 mg/L (finished water)
 - f. Manganese, 0.034 mg/L (finished water)
 - g. Orthophosphate, 0.04mg/L (finished water)
 - h. Carbon Dioxide, 30 mg/L (finished water)
 - i. Temperature, 14 degrees Celsius (raw water)

All test were performed adequately to provide accurate results for daily plant operation and all results were within acceptable limits. The division also certified Mr. Travis Owens for calibration of the 2100N benchtop and the 1720 inline turbidimeters. This certification is valid until the next sanitary survey or until he is no longer employed by the water system and is contingent on proper maintenance of equipment and calibration standards.

3. Laguardo must provide a wellhead protection plan to the division for review no later than one year after the water treatment plant was placed into operation. Since the treatment plant was brought online in July 2014, the plan must be submitted no later than July 31, 2015.
4. Due to the fact that Laguardo has begun using a new source the division requests that the drought management plan be updated to reflect this change. The plan should be submitted to the division for review no later than March 30, 2015. Additionally, during the survey Laguardo personnel mentioned that future plans are to feed the entire service area from the water treatment plant. When this is complete the division will also ask

Laguado to update the Stage 2 Disinfection Byproducts monitoring plan and the flushing plan. The division should be informed when this change is taking place.

5. The population of the water system has increased since the last sanitary survey. The water system serves a total of 3,709 connections which gives the water department a calculated population of 9,940. This change was not significant enough to increase the number of bacteriological samples collected. Therefore, Laguado must continue to collect 10 bacteriological samples per month. An updated drinking water monitoring program is attached.

Thank you again for the professionalism and considerate attitude shown by your staff during the survey. We look forward to working with you in the future. Thank you also for your efforts to keep Tennessean's supplied with safe, clean drinking water. If you have either questions or comments concerning the Sanitary Survey, or survey letter, contact Thomas Killion at (615) 687-7059 or me at (615) 687-7119.

Sincerely,



Ann Morbitt
Environmental Program Manager
Division of Water Resources

cc: Wilson County Health Department
Joey Hardin, General Manager, Laguado Utility District
Central Office
File

Enclosures