



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES

Nashville Environmental Field Office

711 R.S. Gass Blvd

Nashville, TN 37216

Phone 615-687-7000 Statewide 1-888-891-8332 Fax 615-687-7078

September 29, 2016

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

Certified Mail
7006 0500 0002 4403 4602
Return Receipt Requested

RE: **Sanitary Survey-Community Water System**
Laguardo Utility District
PWSID #0000394
Wilson County

Dear Mr. Gray:

On September 7-9, 2016, Lonnie McCloud and I, from the Division of Water Resources (Division), visited the Laguardo Utility District (LUD) and performed a Sanitary Survey. The survey consisted of a records review to document the operational performance of the system and an on-site inspection of the distribution system. The survey covered the time period from October 2014 through July 2016. The Division would like to thank Mr. Joey Hardin, Mr. Travis Owens, and the rest of the LUD staff for their courtesy, willingness to work with the Division, and timely responses to Division requests. In accordance with the Sanitary Survey Manual the LUD earned 596 points out of a possible 599 points for a numerical score of ninety-nine percent (99%). This rating places LUD in the State's "Approved" category.

The following deficiencies, comments, and/or recommendations as outlined in the Sanitary Survey Rating Form were identified during the survey and should be addressed as applicable:

1. Section 1: System Management and Operation.

• **Subsection H. Emergency Operations Plan**

LUD personnel must update the drought management section of the Emergency Operations Plan. According to Division Rule the drought management section of the Emergency Operations Plan (or Drought Management Plan) should have been updated no later than June 30, 2016. However no copy of the update was received by the Division. LUD personnel must submit an updated drought plan to the Division for review within the time specified below.

2. Section 4: Treatment.

• Subsection I. Disinfection

During the tour of the water treatment plant Division staff noted that duplicate disinfection equipment was not in operation at the time of the survey. The chlorine room has 4 pumps available for the delivery of disinfectant. However, only one of these pumps was in operation at the time. LUD personnel must ensure that duplicate disinfection is in place with at least two pumps feeding a portion of the disinfectant dose. **Within 30 days of the receipt of this correspondence** the LUD water treatment plant must have duplicate disinfection equipment operational. **Three (3) points** were deducted from the scoring calculation for this item.

Please provide a written response, **within thirty (30) days of receipt of this letter**, outlining what will be done or has been done to correct the above mentioned violations. Send the response letter to the address at the top of this letter, to the attention of Thomas Killior.

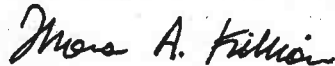
General Observations, Comments, and Other Recommendations

1. During the survey LUD personnel made the Division aware that it was in the process of placing the newly approved source wells online. As a reminder, LUD must have the construction associated with this approved before placing the new source online. LUD should also be aware that chemical monitoring requirements will likely change as a result of using the new source.
2. Division staff performed an onsite review of all of LUD's water storage tanks. All tanks were in good shape and fit for their purpose. However, a few of the tanks could use some minor attention. The Five Oaks and Bates Road tanks could use some regrouting along the base of the tank, and the Cairo Bend tank should be cleaned in order to keep mildew from damaging the paint.
3. Division staff observed Mr. Travis Owens perform the following analysis: turbidity, free chlorine residual, temperature, pH, alkalinity, orthophosphate, and hardness. Therefore state approval for daily analysis is hereby granted to the Laguardo Utility District to perform the above -mentioned parameters. Mr. Owens was also approved to perform calibration of the bench-top turbidimeter. However, no personnel were approved to calibrate the inline Turbidimeters. LUD must continue to use an outside source for this calibration. This approval is effective until the next sanitary survey or until he is no longer employed by the water system and is contingent upon use of approved methodologies and proper operation and calibration of the analysis equipment.
4. During a review of the LUD Monthly Operations Reports (MORs) Division staff determined that LUD is using outdated forms for the Disinfectant Monitoring Report (CN-1201), and the Interim Enhanced Surface Water Treatment Rule Filter Performance Report (CN-1200). Copies of the current forms have been included with this letter and electronic copies can be found at the following link: <http://www.tennessee.gov/environment/topic/wr-wq-dw-drinking-water>. Please begin using the current forms with your next MOR submittal.

5. LUD now has 3,858 connections serving an estimated population of 10,339. The number of required bacteriological samples taken from the distribution system remains at **Ten (10) per month**. The updated Drinking Water Monitoring Program for the system in accordance with Rule 0400-45-01-0.17(3) is enclosed.

Again, I would like to thank Laguardo Utility District personnel for their assistance and courtesy. If you have any questions or need additional information, please contact me at (615) 687-7059.

Sincerely,



Thomas Killian, Environmental Scientist
Nashville Environmental Field Office
Division of Water Resources

Enclosures

cc: Nashville Central Office
Joey Hardin, General Manager, Laguardo Utility District
File