

**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
WATER DIVISION – INDUSTRIAL AND MUNICIPAL SECTIONS  
NONCOMPLIANCE NOTIFICATION FORM**

PERMITTEE NAME: Jefferson County Commission ESD PERMIT NO: AL0022934  
 FACILITY LOCATION: Trussville WWTP 325 City Hall Drive, Trussville, Al 35173, Jefferson County  
 DMR REPORTING PERIOD: May 19, 2017

1. DESCRIPTION OF DISCHARGE: (Include outfall number (s))

The effluent was contaminated by the introduction of water in contact with 65% Calcium Hypochlorite (HTH) that had been spread over the effluent cascade structure downstream of the parshall flume and upstream of the outfall. The discharge likely exceeded the permit limit. A fish kill was observed and documented by the Jefferson County Department of Health, Fish and Wildlife Service, and ADEM personnel.

2. DESCRIPTION OF NON-COMPLIANCE: (Attach additional pages if necessary):

<b>LIST EFFLUENT VIOLATIONS (If applicable)</b>			
Outfall Number (s)	NONCOMPLIANCE PARAMETER(S)	Result Reported (Include units)	Permit Limit (Include units)
0011	Total Residual Chlorine (TRC)	not available	0.019 mg/l
<b>LIST MONITORING / REPORTING VIOLATIONS (If applicable)</b>			
Outfall Number (s)	NONCOMPLIANCE PARAMETER(S)	Monitoring / Reporting Violation (Provide description)	

3. CAUSE OF NON-COMPLIANCE (Attach additional pages if necessary):

See attachment.

4. PERIOD OF NONCOMPLIANCE: (Include exact date(s) and time(s) or, if not corrected, the anticipated time the noncompliance is expected to continue):

May 19, 2017

5. DESCRIPTION OF STEPS TAKEN AND/OR BEING TAKEN TO REDUCE OR ELIMINATE THE NONCOMPLYING DISCHARGE AND TO PREVENT ITS RECURRENCE (attach additional pages if necessary):

All effluent cleaning activities with any chemicals, including HTH or other algae removal products, has been stopped. Cleaning will be with manual brushes or water only until such time that a department wide SOP has been developed and approved.

"I certify under penalty of law that this document and all attachments were prepared under my 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."

Gary L. Nelson WWTP Manager  
 NAME AND TITLE OF RESPONSIBLE OFFICIAL (type or print)

Gary L. Nelson, 5/24/2017  
 SIGNATURE OF RESPONSIBLE OFFICIAL / DATE SIGNED

## Non-compliance Notification Form

Trussville WWTP AL0022934

May 2017

### ITEM 3 - CAUSE OF NON-COMPLIANCE:

The operator cleaned the effluent cascade (picture below) with approximately five pounds of sixty-five percent calcium hypochlorite (HTH) the morning of May 19, 2017 at approximately 8:30 a.m. In the past, the operator has isolated the area being cleaned from effluent flow for a period of two to three hours to allow the HTH to react with the algae growth and allow the oxidizing potential to be consumed. Due to changes associated with the ongoing construction, the operator was unable to adequately isolate the area. The operator reintroduced flow into a final clarifier that had been out of service, and the clarifier began to overflow sooner than the operator anticipated. In doing so, the operator inadvertently allowed effluent flow to reach the cascade. According to the Citect trend data, the effluent flow reached the cascade at approximately 8:59 a.m. The effluent flow reacted with the HTH likely increasing the effluent chlorine concentration above the permitted limit. A representative of the Jefferson County Health Department notified the Environmental Services Department at 10:20 a.m. of an observed fish kill near the outfall of the Trussville WWTP. Upon discovery of the fish kill, the Trussville WWTP staff took a grab sample of the effluent for chlorine testing. The sample could not be tested onsite due to failure of the test meter. Chlorine is not a normal test parameter for the plant since UV is used for wastewater disinfection, so a sample was collected and sent to Barton Laboratory for testing. Due to holding times limitations, the testing did not meet standard methods and the results are unreliable. In stream chlorine levels were measured near the outfall and showed elevated results. The County believes the HTH cleaning activity caused the fish kill.

