



Covington Public Works/Utilities

DIRECTOR OF PUBLIC WORKS

City of Covington

Public Works Meeting

City Hall

Downstairs Board Room 4:00 P.M.

November 5, 2024

- 1. Update on Well #4 (Completed)**
- 2. Pretreatment Compliance Inspection 2024 (see attachment)**
- 3. Gas Pipeline Safety Inspection 2024 (see Attachment)**
- 4. Bobby Flowers promoted to Grounds Supervisor**
- 5. Joe Bloechl passed his WW Grade 4 test**
- 6. Malik will take his Water Grade 3 test 11/14**
- 7. Chris/ Rodney will take a Water Testing Class on 11/18-21**
- 8. Open positions-2 Utility Repairmen**

Other Business:

- 1. Code Division monthly report: (See attached)**

Adjourn:



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

Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, TN 38133

Phone 901-371-3000 Statewide 1-888-891-8332 Fax 901-371-3170

September 19, 2024

Mayor Jan Hensley
City of Covington
200 West Washington
Covington, TN 38019

Re: Pretreatment Compliance Inspection
 Covington Sewage Treatment Plant (STP)
 NPDES Permit No. TN0020982
 Tipton County

Dear Mayor Hensley:

On April 30, 2024, Ms. Brittany Gibson with the Division of Water Resources, Memphis Environmental Field Office (DWR/MEFO) conducted a Pretreatment Compliance Inspection (PCI) at the City of Covington's Sewage Treatment Plant (STP). Upon arrival at the facility, Ms. Gibson met with Mr. James Mason - Chief Certified Wastewater Operator, and Mr. Calvin Johnson - Utilities Manager, and stated that the purpose of the inspection was to review the City of Covington's Pretreatment Program. This was accomplished by reviewing each of the facility's Significant Industrial User (SIU) files and permits, and subsequently conducting an inspection of a selected SIU (Charms, LLC.). These visits provide an excellent opportunity to ask questions or discuss any problems that your SIUs may be experiencing with the current pretreatment program.

This inspection covered the period of June 2023 through March 2024. The City of Covington has four (4) Significant Industrial Users (SIUs). Only one (1) is a Categorical Industrial User (CIU) and the remaining three (3) are Non-Categorical Industrial Users (NCIUs). Three out of four (3/4) of Covington's SIUs are operational and actively discharging.

Mueller Fittings (metal finishing manufacturer), the STP's only CIU has been down and out of operation since March 31, 2023, when a F3 tornado touched down in Covington, TN. This facility is not currently discharging. However, the facility anticipates starting production operations up around October 2024. Mr. Mason and Mr. Johnson plan to inspect the facility before and after production start-up.

Covington's three (3) NCIUs are Charms Co. (hard candy manufacturer), Sugaright (sugar/sucrose manufacturer), and Unilever (ice cream/popsicle manufacturer). All three are actively discharging. Charms LLC. was selected for an on-site inspection. During the inspection Ms. Gibson, Mr. Mason, and Mr. Johnson met with Mr. Harvey Beasley - Sanitation Supervisor to discuss the overview of their manufacturing process. Afterwards, a tour was conducted at the facility.

Biosolids are sent to a municipal solid waste landfill. The Division of Solid Waste Management regulates this process.

The following are items to note regarding this inspection:

- During this reporting period Unilever received one (1) Notice of Violation (NOV) in January 2024 for BOD exceedances.
- *As of the date of this letter, the City of Covington submitted their Industrial Waste Survey (IWS) to Nashville Central Office (NCO) in June 2024.*

The City of Covington exhibits a comprehensive and structured pretreatment program. The Division appreciates Mr. Mason's and Mr. Johnson's cooperation and assistance during this visit and the City of Covington's continued efforts to comply with its' pretreatment regulations. If you have any questions or comments regarding this visit, please contact Ms. Brittany Gibson at (901) 633-6931 or Brittany.Gibson@tn.gov.

Sincerely,



Brittany Gibson
Environmental Scientist
Division of Water Resources
Memphis Environmental Field Office

cc: TDEC/DWR/MEFO – File

ec: David Gray- Public Works Director
Calvin Johnson - City of Covington Utilities & Water Manager
James Mason - Covington Chief Certified Wastewater Operator
Samantha O'Neil - TDEC/DWR/NCO, State Pretreatment Coordinator
Gordon Holcomb - TDEC/DWR/NCO, State Pretreatment



**Tennessee Public Utility Commission
Gas Pipeline Safety Division
2024 Inspection (Onsite Days) Affidavit – RRO**

I acknowledge that an inspection of _____ City of Covington Gas OPID #02853
(Operator)

on the following date(s): _____ September 9th through 11th _____, 2024,

was performed and that the completed inspection form was available for review during the exit interview and the information provided for purposes of this inspection is true, accurate, and complete to the best of my knowledge and belief.

Contact Personnel: _____ Calvin Johnson _____ Title: _____ Utilities Manager _____

Office #: _____ 901.476.0583 _____ Cell# _____ 901.232.6688 _____ Email: _____ cjohnson@covingtontn.com _____

Mailing Address, City State Zip: _____ P.O. Box 768, Covington, TN 38109 _____


Company Street Address: _____ 300 S. College St., Covington, TN 38109 _____


Responsible Company Official: _____ Jan Hensley _____ Title: _____ Mayor _____

Mailing Address: _____ 200 W. Washington Ave., Covington, TN 38109 _____

- A GPSD exit interview summary will be attached to this affidavit listing all potential violations and recommendations as observed during the inspection. All guidance, action plans, and technical assistance pertaining to this inspection will be documented on the exit interview summary along with the acknowledgement signatures of the operator and inspector.

Executed and sworn on this _____ 11th _____ day of _____ September _____, 2024

Operator Signature	Operator Printed
	Calvin Johnson

Inspector Signature	Date(s) of Attendance	Inspector Printed
	9/9-11/2024	Kenneth Harper



Tennessee Public Utility Commission - Gas Pipeline Safety Division
2024 Safety Inspection Evaluation & Exit Interview

Operator: City of Covington Gas	Inspection Number: 24-029RROKH
Federal ID Number: 2853	Inspection Type: Regulators, Reliefs, & Odorant and OQ P9
Location: Covington, TN	Inspection Date(s): 9/9-11/24
Contacted: Calvin Johnson	TPUC: Kenneth Harper
Pre-Inspection Date (If Applicable): 5/13/24	Remote Date(s): N/A
Onsite Date(s): 9/9-11/24	Report Submittal Date: 9/21/24
Section 114 Inspection Date: N/A	Travel Date(s) (If not part of Onsite Dates): N/A

Minimum Federal Safety Standards Alleged Violation(s)

Inspection #	Inspection Type	Date(s)	# Cited This Inspection	# Closed This Inspection	# Previously Cited - Still Open	Total # Open
20-010	Valves, Leaks, Patrolling	5/12-14/2020	0	0	0	0
22-010DA	PAP	1/10/2022	0	0	0	0
23-013IMPTW	DIMP	2/16/2023	0	0	0	0
23-017VLP&CKH	Valves, Leaks, Patrolling, Corrosion & OQ P9	12/12-13/2023	0	0	0	0
24-018PAPKH	Public Awareness	5/29-30/24	0	0	0	0
24-029ROKH	RRO & OQ P9	9/9-11/24	0	0	0	0

Cited/Open/Closed Violations

Advisory Notes:

Failure to address cited violations within the timeframe mandated may result in assessment of a civil penalty of up to \$100,000 per day up to a maximum of \$1,000,000.

No violations were cited for Inspection 24-029RROKH.

No violations open from previous inspections.

No violations closed from previous inspections.

Inspection Summary

Above listed inspection(s) were performed for the City of Covington Gas Department on September 9th through 11th, 2024. The attached report is used to document the review of policies, procedures, records, and other documentation maintained to demonstrate compliance with the minimum federal safety standards (MFSS) and State of Tennessee Gas Pipeline Safety Division (GPSD) regulations.

Non-Compliances

**Minimum Federal Safety Standards Alleged Non-Compliance(s)
(Non-Compliances Cited or Closed through Follow-Up are Reported Below)**

Inspection #	Inspection Type	Date(s)	# Cited This Inspection	# Closed This Inspection	# Previously Cited - Still Open	Total # Open
20-010	Valves, Leaks, Patrolling	5/12-14/2020	0	0	0	0
22-010DA	PAP	1/10/2022	0	0	0	0
23-013IMPTW	DIMP	2/16/2023	0	0	0	0
23-017VLP&CKH	Valves, Leaks, Patrolling, Corrosion & OQ P9	12/12-13/2023	0	0	0	0
24-018PAPKH	Public Awareness	5/29-30/24	0	0	0	0
24-029ROKH	RRO & OQ P9	9/9-11/24	0	0	0	0

Failure to address cited non-compliances within the timeframe mandated may result in assessment of a civil penalty of up to \$100,000 per day up to a maximum of \$1,000,000.

1. Non-compliances (Present Inspection):

No non-compliances were observed during this inspection.

2. Non-compliances (Previous Inspections):

No non-compliances from previous inspections remain open or were closed during this inspection.

3. Technical Assistance:

No technical assistance was provided during this inspection.

4. Recommendations/Best Practices:

The Recommendations/Best Practices listed below is/are not required by code, but would demonstrate compliance:

1. Revise pressure test procedures in O&M manual to include test duration time when pressure testing is required.

2. Revise odorant sampling procedure in O&M manual to provide guidance to personnel using a CGI to confirm acceptable odorant levels.

5. Operator Comments:

No operator comments provided during inspection.

6. Inspection Notes:

API 1162 was generally followed as guidance in construction of plan and program. A review of excavation damages for the previous five years was reviewed with the operator, with occurrence of damages trending relatively flat. Operator experienced one third-party damage to the system last year and has reacted by increasing education and communication with the excavator. System coated steel piping was determined by operator to be adequately protected with low occurrence of leaks due to corrosion.

Operator should continue observing system to present an on-going program, adjusting to changes in growth of system to reduce excavation damages. Involvement and education should continue with public schools to help raise awareness concerning recognizing leaks. Effectiveness evaluations should be reviewed and analyzed for possible improvements in awareness of the hazards of natural gas. Operator is encouraged to contact Gas Pipeline Safety for technical assistance if questions or guidance is needed regarding the Public Awareness Program and API 1162.

7. Excavation Damage/Damage Prevention:

Operator excavation damage statistics was discussed along with prevention. Operator is encouraged to follow Tenn. Code Ann. § 65-31-111(e), when operators whose utility facilities have been damaged, which states reporting the incident using the Damage Information Reporting Tool (DIRT) utilized by the Common Ground Alliance.

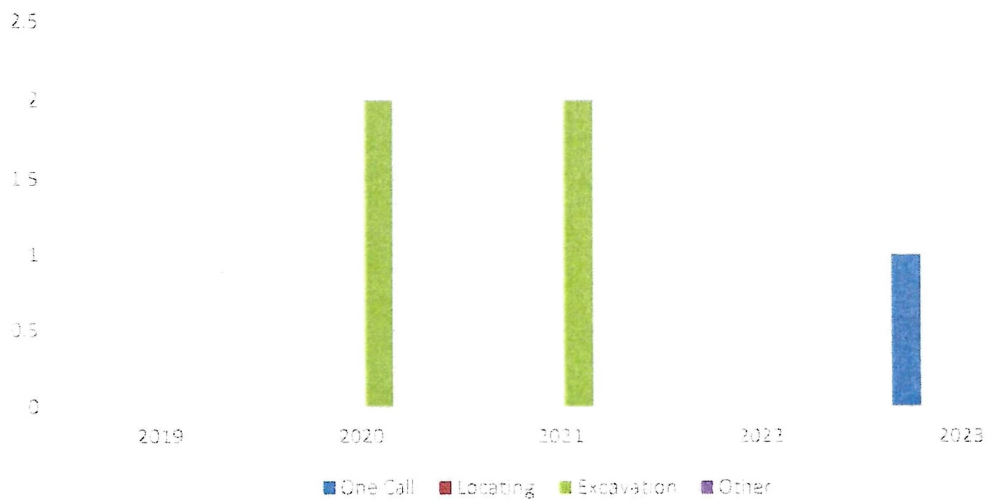
The following link will provide more information regarding the DIRT tool and the Excavation Damage Enforcement:

<https://www.tn.gov/tpuc/divisions/uudp-underground-utility-damage-prevention.html>

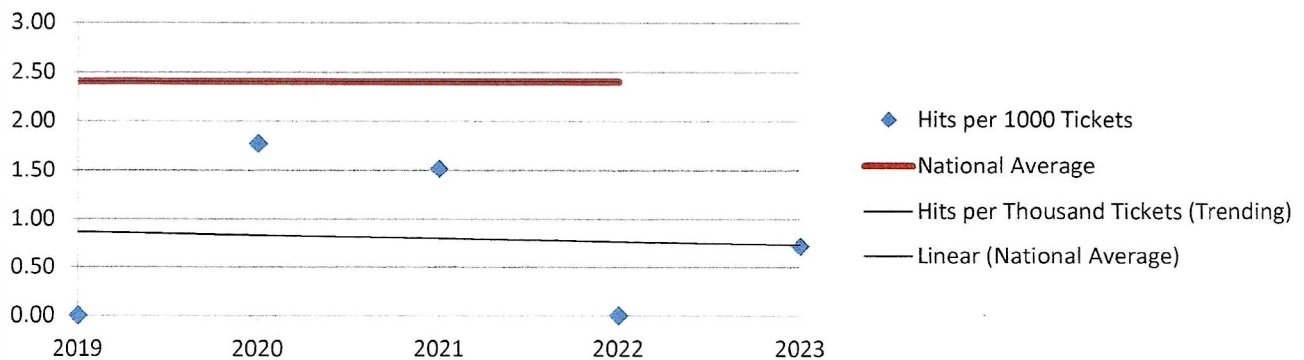
As a reminder, anyone who has experienced or witnessed a probable violation of Tenn. Code Ann. §65-31-101 et al. may file a complaint with the Tennessee Public Utility Commission or by calling 615-741-2904. In order to ensure timely investigations, complaints must be filed within ninety (90) days of being made aware of an alleged violation of the Underground Utility Damage Prevention Act.

CITY OF COVINGTON GAS 5-YEAR HITS pr 1000 EXCAVATION DAMAGE SUMMARY							
Calendar Year	Total Hits	Total Tickets	Hits per 1000	One Call	Locating	Excavation	Other
2023	1	1394	0.7	1	0	0	0
2022	0	1318	0	0	0	0	0
2021	2	1318	1.52	0	0	2	0
2020	2	1128	1.77	0	0	2	0
2019	0	1222	0	0	0	0	0

City of Covington Gas
5 Year Excavation Damage Summary



City of Covington Gas 5-Year Excavation Damage Compared to National Average



National Average 2.4

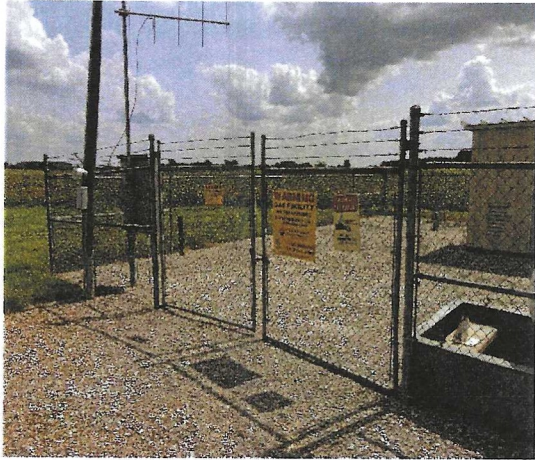
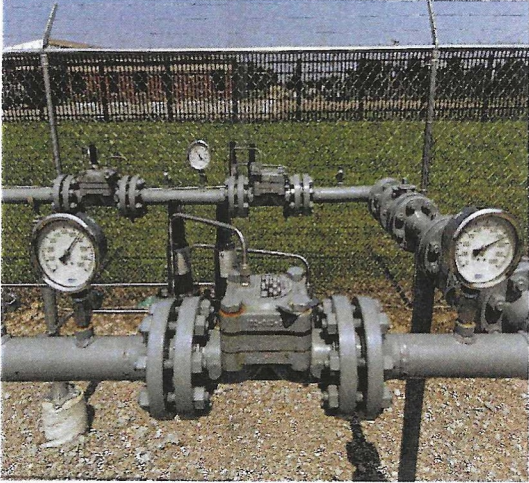

***Tennessee State Average 3.4**

The City of Covington Gas Department's average number of hits unfortunately increased from zero to 0.7, however, it is much better than both the national and *state averages. One-call issues were identified as the reason for the increase.

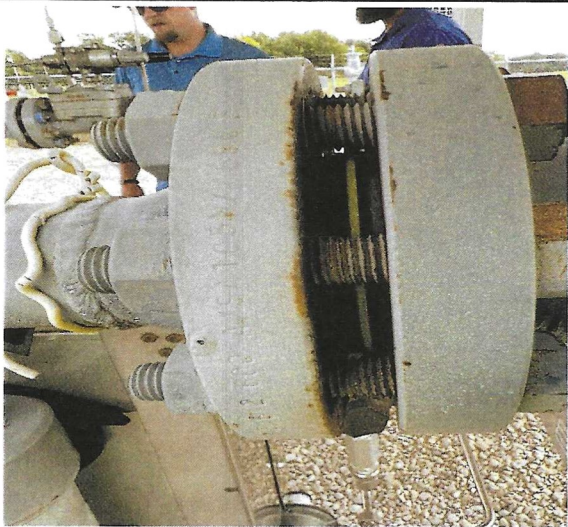
8. Photo Documentation:

See below

Photo Documentation

No.	Photo	Description
1		<p style="text-align: center;">Mueller Brass Regulator Station <u>Regulator Station Security</u></p> <p>The Colonial Heights regulator station is located off the road behind a locked and chained gate to prevent unauthorized access and vandalism. All of the regulator stations seen during the inspection were secure. There are no issues or concerns.</p>
2		<p style="text-align: center;">Mueller Brass Regulator Station <u>Regulator Station Inspection</u></p> <p>The regulator station is well painted and pressure gauges were clean and legible. Slight surface rust visible but no atmospheric corrosion concerns. The pipe to soil transitions were protected.</p>
3		<p style="text-align: center;">Colonial Heights <u>Regulator Station Public Awareness</u></p> <p>The regulator station clearly visible and readily accessible. Warning and danger signage placed conspicuously on fencing to inform public of the presence of the gas pipeline facility at this location. In case of emergency, the operator's emergency contact information also listed on signage.</p> <p>All of the regulator stations seen during the inspection had required signage. There are no issues or concerns.</p>

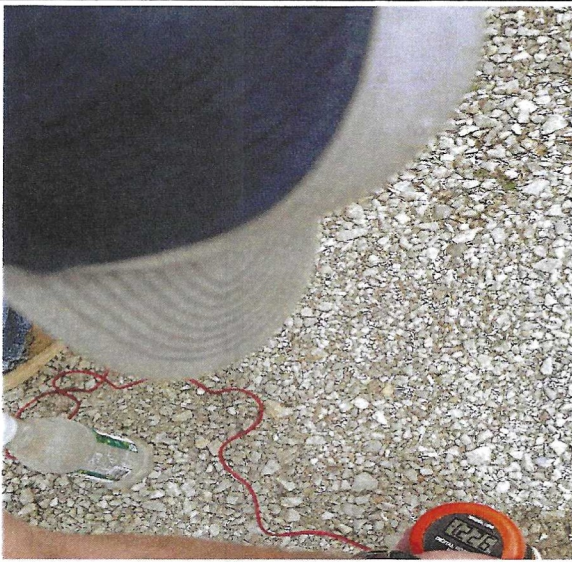
4



First Utilities Regulator Station
Flange and Flange Accessories

The regulator station piping and flanges protected by paint. Slight surface rust visible on the fittings; however, flanges observed at the regulator stations were ASME B16.5 compliant and met the MAOP requirements for the pipeline system.

5



Rialto Regulator Station
Cathodic Protection Measurement

Patrick Steinhaus, City of Covington Gas technician taking a pipe to soil reading (-1.226 V). The regulator station is well painted and has some slight surface rust; however, there is no atmospheric corrosion. There are no issues or concerns.

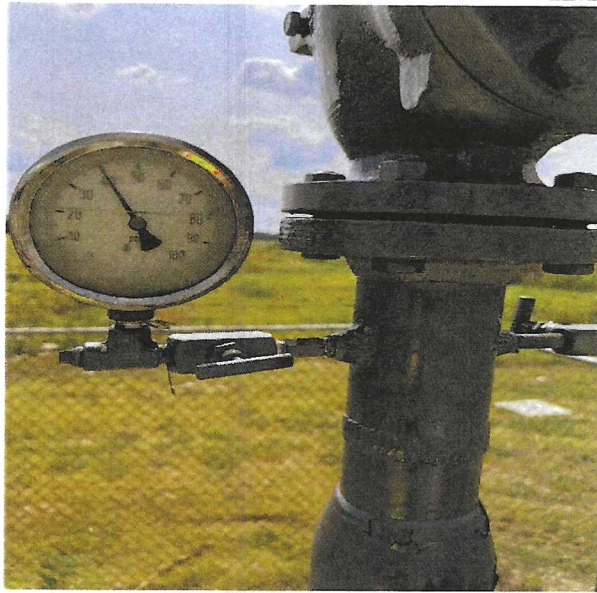
6



Ervin Lane Regulator Station
Maximum Operating Pressure Chart

The City of Covington Gas department uses recording charts for some of its regulator stations. This photo shows outlet distribution MOP at this station to be 40 psig.

7



ESL Regulator Station
Overpressure Protection

City of Covington Gas ESL regulator station relief gauge showing 40 psig set point. All system regulator stations operated and maintained by contractor (Sullivan Natural Gas).

8



4625 Hwy 59 South
Odorant Sampling point

Patrick Steinhaus performing the odorant level sampling with Dtex CGI and got a readily detectable reading of (0.15%). Inspector verified the final result by sniffing the machine as well. Dtex Odorator Serial #D01725 calibrated 9-18-23 (2 yr cycle).

9



Mueller Brass Regulator Station
Odorizer Check

During the inspection, Calvin Johnson, City of Covington Gas performed an odorant level check of odorizer and can be seen adding odorant to the reservoir.

Camera Type: State issued iPhone

If you need further assistance or have questions, please contact Kenneth Harper via email at kenneth.harper@tn.gov or by phone at (615) 969-1768, or Travis Aslinger via email at travis.aslinger@tn.gov or by phone at (615) 202-9848.

CODE COMPLIANCE DEPARTMENT REPORT: NOVEMBER 5, 2024



TOUCHPOINTS:

Personnel Report: 1 employee will be out of the office an extended period of time

1 part time employee position is posted

Training: On going in numerous subjects

On Going Projects:

- Blight Grant
- Property Maintenance Concerns
- Site Plans submitted - none
- Re-zoning Application or Text Amendment submitted:
 - Go4th Rental Services/Joey Goforth – 785 East Street
 - Johnny Berryman -- 2030/2032 South Main Street
 - Greenpoint Ag – 1270 Simonton Street
- Commercial Renovation applications submitted:
 - BMH – Tipton Infusion lab
 - Covington Country Club – rebuild
 - Spricks Cabinets and Carpentry Solutions – 1318 Hwy 51 North

No meeting in October