



April 14, 2014

Mr. Scott Hagins
Compliance Manager
Water Pollution Compliance Section
Bureau of Water, S.C. DHEC
2600 Bull Street
Columbia, SC 29201

Re: Carolina Water Service, Inc.
I-20 WWTP
NPDES Permit # SC0035564
Lexington County

Dear Mr. Hagins:

Carolina Water Service, Inc. (CWS) is in receipt of your letter dated April 2, 2014, which was received in our office April 5, 2014, regarding your Compliance Sampling Inspection (CSI) performed on August 19, 2013 to August 21, 2013, at the above referenced facility.

Your letter indicated the effluent was not meeting applicable permit requirements and/or parameter limits during the sampling period as well as deficiencies in the Records and Reports, Flow Measurement and Self-Monitoring Program sections, which resulted in a non-compliance rating.

Please find my comments below.

Records and Reports

CWS contacted both On Line Environmental and Access Analytical in an effort to track down any discrepancies with the chain of custody. I have attached a copy of the correspondence from Access Analytical that documents what occurred. CWS follows all requirements for Chain of Custody (C of C) and tries to ensure that our vendors also follow these requirements.

However, some lapses may occur that are beyond the control of CWS. In this instance a vendor, Pace Labs, returned a sample to Access Analytical with the original C of C and not a specific C of C for the return shipment. CWS will continue to strive to meet all requirements and will stress the importance of this to our vendors.

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The O&M Manual for this facility is kept in the I-20 Field Office on Mineral Springs Road and was available for review at the time of the inspection. The Manual is current with all improvements to this facility. It should be noted that the I-20 WWTF does not have buildings that are suited for long term storage of records. The interior of the existing buildings are not temperature or humidity controlled and at times insects may become a problem as well. For this purpose, all records, other than monthly logs, are stored in proper file cabinets at the I-20 Field Office located within the WWTF's collection system boundaries.

Flow Measurement

CWS is unsure as to the cause of the discrepancy with the secondary flow recorder. The device had been checked the day before the inspection began and is routinely checked and adjusted, if needed, on a weekly basis. All checks and adjustments are recorded in the facility logbook.

Self Monitoring Program

CWS routinely does process control testing for total residual chlorine. In these tests the chlorine meter is not calibrated and the results should not have been reported to the department. In this instance, only four results should have been included in the data used on the DMR, 0.99 mg/l, 0 mg/l, 0.19 mg/l and 0 mg/l. This would have resulted in a monthly average of 0.30 mg/l.

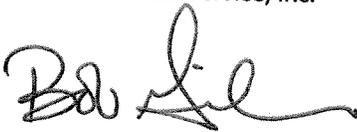
The staff member who incorrectly included the process control data is no longer employed by CWS. Current staff has been reminded that process control data, without proper calibrations, is not to be included when preparing DMRs.

CWS trusts that this information will adequately address the items identified in the CSI report.

Should you have any questions, or if we can provide any additional information, please do not hesitate to contact Mac Mitchell at (803) 796-2313, Ext. 3203.

Sincerely,

Carolina Water Service, Inc.



Bob Gilroy
Vice President of Operations

Cc: Mac Mitchell, Regional Manager
Scotty Haws, Regional Compliance & Safety Manager
Tony Ellinger, Area Manager

Mac Mitchell

From: Ashley Amick [aamick@axs-inc.com]
Sent: Monday, April 14, 2014 10:28 AM
To: Mac Mitchell
Cc: Angela Martin; Bryant Boyd
Subject: Information regarding sample from Jan. 2013
Attachments: OLEI 01 10 13 92143818 CWS Inquiry.pdf; OLEI 01.09.13 92143818 CWS 01.03.pdf; OLEI 01.24.13 1301B91 CWS-Revised.pdf

Mr. Mitchell –

I went back and researched the project you inquired about earlier. Here is a quick rundown on this one:

- I. This set of samples (which includes the "I-20 Reg. Eff." One) was received from On Line Env. on January 4th, 2013.
- II. It was noted that several of these samples needed to be analyzed for Sodium under the Clean Water Act program area. At that point our main partner lab (AES in Atlanta) did not have DHEC certification for Soddium. With that in mind the samples were sent to Pace labs in Huntersville as they were DHEC certified for all analytes being requested. The set of samples was shipped out to Pace via FedEx on January 4th and received at Pace on January 5th. A copy of this report and COC is attached for your reference.
- III. On January 9th Pace completed these analysis. The data was reviewed at Access before being released to On Line Env. It was discovered that several of the DHEC required PQL's were not being met by Pace labs. An inquiry was sent to Pace on January 10th about this issue, a copy of this inquiry is attached for your reference.
- IV. Pace labs acknowledged that they could not meet the required PQL's for Cd & Pb for these samples and agreed to return the unused portion of the samples to Access. A copy of this correspondence is as follows:

*"From: Kevin Godwin
Sent: Tuesday, January 15, 2013 11:18 AM
To: Martin, Angela
Cc: Cantrell, Allison
Subject: RE: Question about this report*

Hi Angela,

Wanted to keep you in the loop...We have found samples Roosevelt Eff and I-20 Reg Eff. We have not been able to locate Country Oaks EFF. My receiving department is still looking for the Country Oaks Eff sample.

We are shipping the samples back to you tonight. You will receive tomorrow.

*Kevin Godwin
Project Manager
Pace Analytical
9800 Kincey Ave, Suite 100
Huntersville, NC 28078
Phone: 704.875.9092 ext. 237*

Fax: 704.875.9091
www.pacelabs.com

I did check with Pace labs and they did not include a separate return CoC for these samples. They simply put them back in a cooler with a copy of the original CoC and sent them back to our office. So there is not a separate chain from Pace to Access.

V. The above referenced samples were received back at the Access Analytical office on January 16th. The samples were sent out from Access Analytical to AES labs on the afternoon of January 16th and received at AES on January 17th (Note: on the COC for this project AES labs did get these samples on the 17th, however the signers handwriting is not the best and the date does look the 12th, that "2" is actually a "7" however). A copy of this report is included for your reference.

This is about all I can turn up regarding this project, sorry about any confusion on this. AES has since gotten certification for Sodium and made life simpler as we no longer have to either split samples up send them to other labs which we don't like to do in the first place.

Please let me know if there is anything else you need. It was good to hear from you, glad you are doing well!

-Ashley

Ashley Amick
Senior Project Manager



Access Analytical, Inc.

comprehensive environmental laboratory services

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*Faith is the substance of things hoped for, the evidence of things not seen.
(Hebrews 11:1)*

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