

ROY COOPER
Governor
ELIZABETH S. BISER
Secretary
RICHARD E. ROGERS, JR.
Director



OFFICIAL COPY

Mar 26 2024

Certified Mail #7022 1670 0000 9974 7559
Return Receipt Requested

March 01, 2024

Michael Myers
Currituck Water and Sewer LLC
4700 Hornewood Ct
Ste 108
Raleigh, NC 27609-1804

SUBJECT: **NOTICE OF VIOLATION & INTENT TO ASSESS CIVIL PENALTY**
Tracking Number: NOV-2024-PC-0145
Permit No. WQCSD0176
Carolina Village Collection System
Currituck County

Dear Mr. Myers:

The North Carolina Division of Water Resources conducted an inspection of the Carolina Village Collection System on February 21, 2024. This inspection was conducted to verify that the facility is operating in compliance with the conditions and limitations specified in Collection System Permit No. WQCSD0176. A summary of the findings and comments noted during the inspection are provided in the enclosed copy of the inspection report.

The Carolina Village Collection System inspection was conducted by Division of Water Resources staff from the Washington Regional Office. The following violation(s) were noted during the inspection:

Inspection Area	Description of Violation
Pump Stations	All pump stations are in a state of disrepair (see pictures below). Several pump stations are partially maintained through pump outs using a pump truck (stationed at the Carolina Village WWTP). Non-engineered components and designs in place, with exposed wiring, controls, and piping present at all locations. All pump station lids open to allow improvised mechanicals to pass through the top of the structure. Signage is faded, not legible, and does not list working emergency contact numbers. (Pump Station on S. Ivon Dr. observed to be full with wastewater product within 24" of the top of the structure on February 13, 2024.)

In addition, the issues below must also be addressed:



Compliance Issue(s):

- (1) Ensure all audible and visual alarms are functional.
- (2) Ensure all pump stations have clearly legible signs referencing the pump stations identification name and emergency contact telephone numbers.

A Notice of Violation/ Intent to Issue Civil Penalty is being issued for the noted violation of North Carolina General Statute (G. S.) 143- 215. 1 and the facility' s Non -discharge Permit. Pursuant to G. S. 143- 215. 6A, a civil penalty of not more than twenty- five thousand dollars (\$ 25, 000. 00) may be assessed against any person who violates or fails to act in accordance with the terms, conditions, or requirements of any permit issued pursuant to G. S. 143- 215. 1.

If you wish to provide additional information regarding the noted violation, request technical assistance, or discuss overall compliance please respond in writing within ten (10) days after receipt of this Notice. A review of your response will be considered along with any additional information provided. You will then be notified of any civil penalties that may be assessed regarding the violations. **If no response is received in this Office within the 10- day period, a civil penalty assessment may be prepared.**

Remedial actions should have already been taken to correct this problem and prevent further occurrences in the future. The Division of Water Resources may pursue enforcement action for this and any additional violations of State law. If the violations are of a continuing nature, not related to operation and/ or maintenance problems, and you anticipate remedial construction activities, then you may wish to consider applying for a Special Order by Consent.

If you should have any questions, please do not hesitate to contact David May with the Water Quality Regional Operations Section in the Washington Regional Office at 252-946-6481.

Sincerely,

David May

David May, Regional Supervisor
Water Quality Regional Operations Section
Washington Regional Office
Division of Water Resources, NCDEQ

ATTACHMENTS: Pictures

cc: Andrew White – EnviroLink (electronic copy)
Don Feller – EnviroLink (electronic copy)
Michelle Pharr – Backup ORC (electronic copy)
Laserfiche





Figure 1. S. Ivon Dr. Pump Station



Figure 2. S. Ivon Dr. Pump Station



Figure 3. David Drive Pump Station



Figure 4. David Drive Pump Station



Figure 5. David Drive Pump Station



Figure 6. Perry Drive Pump Station



Figure 7. Perry Drive Pump Station



Figure 8. Perry Drive Pump Station



Figure 9. Universal Circle Pump Station



Figure 10. Universal Circle Pump Station



Figure 11. Universal Circle Pump Station

Compliance Inspection Report

Permit: WQCSD0176 **Effective:** 03/01/00 **Expiration:** **Owner :** Currituck Water and Sewer LLC
SOC: **Effective:** **Expiration:** **Facility:** Carolina Village Collection System
County: Currituck
Region: Washington

Contact Person: Michael Myers **Title:** **Phone:** 919-630-3461

Directions to Facility:

System Classifications: CS1,

Primary ORC: **Certification:** **Phone:**

Secondary ORC(s):

On-Site Representative(s):

Related Permits:

Inspection Date: 02/21/2024 **Entry Time** 04:00PM **Exit Time:** 05:00PM
Primary Inspector: David L May **Phone:** 252-946-6481 Ext.357
Secondary Inspector(s):

Reason for Inspection: Routine **Inspection Type:** Collection System Inspect Non Sampling
Permit Inspection Type: Deemed permitted collection system management and operation

Facility Status: Compliant Not Compliant

Question Areas:

Miscellaneous Questions General Pump Stations

(See attachment summary)

OFFICIAL COPY

Mar 26 2024

Permit: WQCSD0176

Owner - Facility: Currituck Water and Sewer LLC

Inspection Date: 02/21/2024

Inspection Type : Collection System Inspect Non Sampling **Reason for Visit:** Routine

Inspection Summary:

David May, Robbie Bullock, and Sara Selby with DWR, along with Chuck Junis and Mike Franklin with the NC Utilities Commission Public Staff conducted an inspection on February 21, 2024 with Michelle Pharr. David Pharr (Operator) and Andrew White and Don Feller with Currituck Water and Sewer/EnviroLink joined by cell phone. Pump stations at the following locations were inspected: S. Ivon Dr., David Dr. at Planet Ct., Perry Dr. at Venus Ct., Universal Circle (west side). Several pump stations have green hoses stationed by them. DWR understands pump trucks are used to maintain and manage pump stations, in part, with wastewater product transported to the Carolina Village WWTP for disposal. Discussed tracking pumping activities (pump outs) through a self generated list/form/spreadsheet. All pump stations are in a state of disrepair, with non-engineered components and designs in place to allow some functionality of the system. Exposed wiring, piping, and other mechanical components in poor condition present at all pump stations. Open lids present at all pump stations and can not be shut due to piping, wiring, and other pumping mechanical components passing through the pump station access opening at the top of the structure. Discussed ensuring all audible and visual alarms are functional. Posted signs are faded and not legible and listed emergency contact phone numbers are not functional. Discussed replacing signage to reflect current emergency contact numbers with clear wording that is readable. (Inspection on February 13, 2024) noted pump station on S. Ivon Dr. to be full within 24" of the top of the structure.)

OFFICIAL COPY

Mar 26 2024

Permit: WQCSD0176

Owner - Facility: Currituck Water and Sewer LLC

Inspection Date: 02/21/2024

Inspection Type : Collection System Inspect Non Sampling Reason for Visit: Routine

OFFICIAL COPY

Mar 26 2024

General

	<u>Yes</u>	<u>No</u>	<u>NA</u>	<u>NE</u>
# Is this system a satellite system?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
# If Yes, what is system name or permit number?				
Is there a overall sewer system map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the map include:				
Pipe sizes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pipe materials (PVC, DIP, etc)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pipe location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# Flow direction	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# Approximate pipe age	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# Pump station ID, location and capacity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# Force main air release valve location & type	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# Location of satellite connections	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Are system maintenance records maintained?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment: All pump stations in Carolina Village are in various states of disrepair, with non-engineered components and designs, exposed electrical wiring, and open lids to allowing piping, wiring, and other mechanical fixtures to exit pump station structures. Signage needs to be placed at all pump stations with clearly visible pump station identifier and contact numbers in the event of an emergency. Ensure all audible and visual alarms are functional. Green hose located at several pump stations. DWR understands pump trucks are used to maintain pump stations, as necessary, with wastewater product transported to the Carolina Village WWTP. Reconaissance visit on February 13, 2024 identified wastewater product within 24" of overflowing from the pump station on S. Ivon Dr.

Pump Stations

	<u>Yes</u>	<u>No</u>	<u>NA</u>	<u>NE</u>
Please list the Pump Stations Inspected: S. Ivon Dr., David Dr. at Planet Ct., Perry Dr. at Venus Ct., Universal Circle (west side)				
# Number of duplex or larger pump stations in system				
# Number of vacuum stations in system				
# Number of simplex pump stations in system				
# Number of simplex pump stations in system serving more than one building				
How many pump/vacuum stations have:				
# A two-way "auto polling" communication system (SCADA) installed?				
# A simple one-way telemetry/communication system (auto-dialer) installed?				
For pump stations inspected:				
Are they secure with restricted access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Were they free of by-pass structures/pipes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Were wet wells free of excessive grease/debris?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
# Do they all have telemetry installed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Permit: WQCSD0176

Owner - Facility: Currituck Water and Sewer LLC

Inspection Date: 02/21/2024

Inspection Type : Collection System Inspect Non Sampling Reason for Visit: Routine

Is the telemetry system functional?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is a 24-hour notification sign posted ?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the sign include:				
Owner Name?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pump station identifier?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
# Address?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Instructions for notification?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24-hour emergency contact numbers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are audio and visual alarms present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are audio and visual alarms operable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# Is there a backup generator or bypass pump connected?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If tested during inspection, did it function properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is the back-up system tested at least bi-annually under normal operating conditions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# Does it have a dedicated connection for a portable generator?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# Is the owner relying on portable units in the event of a power outage?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
# If Yes, is there a distribution plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If Yes, what resources (Units/Staff/Vehicles/etc) are included in Plan?				
Four pump stations inspected. All in a state of disrepair. Signs faded with non-working phone numbers referenced as contacts in cases of emergency. Pump stations being partially managed/maintained with a pump truck that is stationed at the Carolina Village WWTP.				
# Does Permittee have the approved percentage of replacement simplex pumps?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is recordkeeping of pump station inspection and maintenance program adequate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Do pump station logs include at a minimum:				
Inside and outside cleaning and debris removal?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Inspecting and exercising all valves?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Inspecting and lubricating pumps and other equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Inspecting alarms, telemetry and auxiliary equipment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Comment: Ensure audible and visual alarms are functional.

OFFICIAL COPY

Mar 26 2024