

**PUBLIC SERVICES**  
**Robby Stone, P.E. MPA**  
**Public Services Director**



October 11<sup>th</sup>, 2024

Mr. Lon T. Snider  
Regional Supervisor  
Water Quality Regional Operations Section  
Winston-Salem Regional Office  
450 West Hanes Mill Rd., Suite 300  
Winston-Salem, North Carolina 27105

Re: Notice of Violation NOV-2024-LV-0807  
City of High Point  
Eastside Wastewater Treatment Plant  
5898 Riverdale Drive  
Jamestown, Guilford County, North Carolina 27282  
NPDES Permit NC0024210

Dear Mr. Snider,

This letter is in response to the Notice of Violation we received dated September 25<sup>th</sup>, 2024. The referenced violation was for the effluent total phosphorus concentration for the month of July 2024.

The Eastside WWTP (Eastside) has developed a corrective action plan with the assistance of Hazen. This plan was detailed in letters dated August 5<sup>th</sup>, 2024, and September 12<sup>th</sup>, 2024. Progress has been made in reconfiguring the Plant Drain Pumpstation for use in the chemical precipitation of phosphate in the centrate side-stream. The pump station is up and running and aluminum sulfate is being fed into the centrate side-stream any time the centrifuge is processing sludge in Residuals Management. This new process went live on Tuesday October 1<sup>st</sup>, 2024. In addition, Residuals Management staff are collecting regular samples of the centrate and running our phosphate analysis on them to better manage the centrate alum feed operation.

Hazen has also recommended that Eastside explore alternative pumping options for the sludge that is in the sludge storage tanks uphill from the main sludge tanks that are in regular use. The current pumps require that Eastside pump the entire contents of the tank in one shot. This is due to the size of the pump and pump priming issues. Transferring an entire tank of sludge at once can cause centrifuge process upsets, which can then in turn affect the phosphate profile through the rest of the plant. Hazen has recommended an appropriately sized pump and we have discussed the required plumbing modifications that will be needed. Quotes for the pump and materials have been requested. Eastside will make the sludge pumping modifications once the hardware has been delivered.

In the August 5<sup>th</sup> letter, it was reported that the recommendation of separating the two types of sludges to minimize secondary phosphate release in the storage tanks would occur during the planned incinerator shutdown. However, during the shutdown it was determined by Residuals Management in conjunction with Hazen that the time was not ideal for this process change. Eastside has put on hold the implementation until we are satisfied that the process is at a point that will allow the necessary changes to be made. Eastside also has not yet implemented any alum additions to the end of the biological reactor effluent. This is because phosphate values have been too low to jar test and determine an



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optimal alum dose at that location. Once conditions are such that Eastside can jar test the biological reactor's effluent and develop an appropriate dose, the third recommended action will be implemented.

Eastside was compliant for Total Phosphate in the month of August 2024. The total phosphorus results for the September DMR have not yet been received from the lab.

If you need further clarification or assistance, please don't hesitate to contact me at (336) 883-3215 or [robby.stone@highpointnc.gov](mailto:robby.stone@highpointnc.gov).

Sincerely,

A handwritten signature in blue ink that reads "Robby Stone".

Robby Stone  
Director of Public Services

Cc: Derrick Boone, Assistant Public Services Director  
Dawn Molnar, Wastewater Plants Manager  
John Thomas, Eastside WWTP Wastewater Superintendent  
File

