



City of Chattanooga

Mayor Tim Kelly

April 30, 2025

J.C. Goodwin
Water Enforcement Branch
Enforcement and Compliance Assurance Division
US EPA-Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: *United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245*
Quarterly Report No. 47 – January 1, 2025 to March 31, 2025

Dear Mr. Goodwin:

On behalf of the City of Chattanooga, Tennessee ("City"), and in accordance with the consent decree entered by the United States District Court for the Eastern District of Tennessee (Southern Division), on April 24, 2013, in the case styled the United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245 ("Consent Decree"), we are submitting to both the Environmental Protection Agency ("EPA") and the Tennessee Department of Environment and Conservation ("TDEC") the forty-seventh quarterly report required pursuant to paragraph 38 of the Consent Decree. This report is also being submitted in accordance with the letter from Denise Diaz, dated September 16, 2013, establishing the dates for reporting under the Consent Decree.

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 such 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.

Mr. John Goodwin
April 30, 2025
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Please let me know if you have any questions regarding our submittal.

Sincerely,


Mark Heinzer (April 30, 2025 13:00 EDT)

Mark Heinzer, P.E.
Administrator, Wastewater Department

Enclosure

cc:

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Quarterly Report No. 47

January 1, 2025 – March 31, 2025

Prepared for

**United States Environmental Protection Agency
and Tennessee Department of Environment and
Conservation**

City of Chattanooga
Wastewater Department
Consent Decree Program
Case No. 1:12-cv-00245

Prepared by

City of Chattanooga
Wastewater Department

Submitted by

Jacobs

Jacobs Engineering Group Inc.
Consent Decree Program Manager

Chattanooga, Tennessee

April 30, 2025

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Acronyms and Abbreviations

Ave	Avenue
CD	Consent Decree
CFR	Code of Federal Regulations
CSO	Combined Sewer Overflow
CSS	Combined Sewer System
Dr	Drive
EPA	Environmental Protection Agency
Gal	Gallons
Hrs	Hours
Hwy	Highway
Ln	Lane
MBWWTP	Moccasin Bend Wastewater Treatment Plant
MBEC	Moccasin Bend Environmental Campus
MG	Million Gallons
MH	Manhole
N/A	Not Applicable
No.	Number
NPDES	National Pollutant Discharge Elimination System
PS	Pump Station
Rd	Road
SSO	Sanitary Sewer Overflow
St	Street
TDEC	Tennessee Department of Environment and Conservation
Trl	Trail
UNK	Unknown
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

1.0 Introduction

1.1 Purpose

The City of Chattanooga entered into a consent decree with the United States and the State of Tennessee in the case styled *United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245* (“CD”), which became effective on April 24, 2013. Pursuant to Section IX, paragraph 38 of the CD, Chattanooga is required to submit reports on a quarterly basis to the Environmental Protection Agency (“EPA”) and Tennessee Department of Environment and Conservation (“TDEC”). Chattanooga has prepared Quarterly Report No. 47 to satisfy the reporting requirements of the CD. This report is also being submitted in accordance with the letter from Denise Diaz, dated September 16, 2013, establishing the dates for reporting under the CD.

1.2 Requirements

As detailed in Section IX, paragraph 38 of the CD, Chattanooga is required to report the date, time, location, source, estimated duration and volume, and receiving water of the following events:

1. Sanitary sewer overflow (“SSO”) events occurring during the reporting period;
2. Combined sewer overflow (“CSO”) outfall discharges occurring during the reporting period; and
3. Bypasses at the Moccasin Bend Environmental Campus (“MBEC”) formerly known as Moccasin Bend Wastewater Treatment Plant (“MBWWTP”) occurring during the reporting period.

This information is provided in tabular form in Sections 2.0 – 4.0 of this report.

2.0 SSO Events

For the reporting period of January 1, 2025, through March 31, 2025, Chattanooga experienced the SSOs listed in Table 2-1. An SSO event is defined in paragraph 8.(nn) of the CD as “any discharge of wastewater to waters of the United States or State from Chattanooga’s Sewer System through a point source not permitted in any National Pollutant Discharge Elimination System (“NPDES”) permit, as well as any overflow, spill, or release of wastewater to public or private property from the Sewer System that may not have reached waters of the United States or the State, including all building backups.”

Table 2-1
Quarterly SSO Outfall Discharge Report

January 1, 2025 – March 31, 2025									
SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
1	03-Jan-25	11:00 AM	2207 Rambler Ln	Force Main	UNK'	1.00	25	Land*	Construction/ Maintenance Related
2	06-Jan-25	5:00 AM	5409 Old Hixson Pike (Hixson #2 PS)	Manhole	S100J058	43.60	1,046,400	Storm Ditch	Construction/ Maintenance Related
3	09-Jan-25	10:36 AM	1965 Hixson Marina Rd (Big Ridge 14)	Manhole	S101K001	0.77	180	Storm Ditch	Blockage - General
4	16-Jan-25	9:20 AM	5409 Old Hixson Pike (Hixson #2 PS)	Manhole	S100J058	1.17	17,500	Storm Ditch	Pump Station - Mechanical Failure
5	17-Jan-25	11:30 AM	5203 Old Mission Rd	Manhole	S157K069	0.00	100	South Chickamauga Creek	Blockage - Trash/Debris
6	18-Jan-25	10:43 AM	5409 Old Hixson Pike (Hixson #2 PS)	Manhole	S100J058	3.82	45,800	Storm Ditch	Construction/ Maintenance Related
7	18-Jan-25	2:00 PM	5203 Old Mission Rd	Manhole	S157K070	1.00	300	South Chickamauga Creek	Pump Station - Mechanical Failure
8	19-Jan-25	11:00 AM	5409 Old Hixson Pike (Hixson #2 PS)	Manhole	S100J058	14.00	84,000	Storm Ditch	Construction/ Maintenance Related
9	21-Jan-25	2:00 PM	2900 Westside Dr	Manhole	S156N034	1.50	450	Storm Ditch	Blockage - Grease
10	26-Jan-25	2:00 PM	4216 Mountain Creed Rd	Manhole	S108D021	22.83	33,250	Mountain Creek	Blockage - General
11	06-Feb-25	10:00 AM	5516 Spring Garden Ln	Service Line	UNK'	4.88	6,325	Storm Ditch	Blockage - Grease
12	11-Feb-25	4:39 PM	5409 Old Hixson Pike (Hixson #2 PS)	Manhole	S100J058	214.35	19,291,500	Storm Ditch	Construction/ Maintenance Related

January 1, 2025 – March 31, 2025									
SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
13	12-Feb-25	6:35 AM	455 Moccasin Bend Rd	Manhole	S135P257	7.92	72,000	Tennessee River	Construction/ Maintenance Related
14	12-Feb-25	7:27 AM	1015 Riverfront Pkwy (East Bank)	East Bank	S135O547	65.30	20,000,000	Tennessee River	Construction/ Maintenance Related
15	12-Feb-25	7:27 AM	122 Rowland Gap Rd (West Bank)	West Bank	S135O217	65.30	33,000,000	Tennessee River	Construction/ Maintenance Related
16 ²	12-Feb-25	6:45 PM	1820 E 23rd St	Manhole	S156G049	39.75	350,250	Dobbs Branch	Wet Weather
	12-Feb-25	7:00 PM	1740 E. 23rd St	Manhole	S156G052	39.50		Dobbs Branch	Wet Weather
	12-Feb-25	7:30 PM	2109 Lynnbrook Ave	Manhole	S156G048	39.00		Dobbs Branch	Wet Weather
17 ²	12-Feb-25	6:57 PM	1611 S Orchard Knob Ave	Service Line	UNK ¹	39.05	175,500	Storm Drain	Wet Weather
	12-Feb-25	6:58 PM	1615 S Orchard Knob Ave	Service Line	UNK ¹	39.03		Storm Drain	Wet Weather
18	12-Feb-25	7:30 PM	5203 Old Mission Rd (Brainerd Golf Course PS)	Manhole	S157K070	13.50	4,150	South Chickamauga Creek	Wet Weather
19	12-Feb-25	10:45 PM	1022 Shallowford Rd	Manhole	S147G104	34.50	279,000	South Chickamauga Creek	Wet Weather
20	12-Feb-25	10:45 PM	1111 Plaza Drive	Manhole	S109M084	10.25	61,500	Storm Drain	Wet Weather
21	13-Feb-25	6:15 AM	4602 Gann Store Rd (Big Ridge #2)	Manhole	S111P018	6.75	10,875	Storm Ditch	Wet Weather
22	13-Feb-25	8:00 AM	Sterling Ave & Terrace Ave	Manhole	S136H104	26.50	159,000	Tennessee River	Wet Weather
23	13-Feb-25	8:15 AM	3806 Wilcox Blvd	Manhole	S147F015	25.00	225,000	South Chickamauga Creek	Wet Weather
24	13-Feb-25	9:00 AM	3828 Birmingham Dr	Manhole	S118E077	25.25	75,750	Tennessee River	Wet Weather

January 1, 2025 – March 31, 2025									
SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
25	13-Feb-25	9:00 AM	141 Browns Ferry Rd (Tiftonia #2)	Manhole	S154C025	23.50	35,250	Storm Ditch	Wet Weather
26 ²	13-Feb-25	9:15 AM	6695 Hickory Brook Dr	Manhole	S138M082	24.25	109,125	Storm Drain	Wet Weather
	13-Feb-25	9:15 AM	6722 Hickory Creek Rd	Manhole	S138M019	24.25		Storm Drain	Wet Weather
27 ²	13-Feb-25	10:00 AM	640 Lupton Dr	Manhole	S118G087	24.50	44,325	Storm Ditch	Wet Weather
	13-Feb-25	10:00 AM	701 Lupton Dr	Manhole	S118G116	4.50		Storm Ditch	Wet Weather
	13-Feb-25	10:00 AM	3470 Van Buren St	Manhole	S118G114	2.75		Storm Ditch	Wet Weather
28	13-Feb-25	10:30 AM	143 Baylor School Rd	Manhole	S126G022	22.50	202,500	Storm Ditch	Wet Weather
29	13-Feb-25	11:00 AM	7724 Old Lee Hwy	Manhole	S139D002	23.50	352,500	Storm Ditch	Wet Weather
30	13-Feb-25	11:30 AM	5302 Old Mission Rd	Manhole	S157K058	24.00	72,000	Storm Drain	Wet Weather
31	16-Feb-25	8:35 AM	929 Riverside Dr (Citico PS)	Manhole	S136P008	0.67	200,000	Tennessee River	Power Failure from Power Source
32	24-Feb-25	9:10 AM	600 River St	Manhole	S135L005	0.25	50	Land*	Break
33	25-Feb-25	11:30 AM	1201 Joiner Rd	Manhole	S158M037	UNK ¹	UNK ¹	Mackey Branch	Construction/Maintenance Related
34 ²	26-Feb-25	12:00 PM	Mill Rd	Manhole	S100G033	UNK ¹	100,000	North Chickamauga Creek	Construction/Maintenance Related
	26-Feb-25	12:00 PM	Mill Rd	Manhole	S100J064	UNK ¹		North Chickamauga Creek	Construction/Maintenance Related
	26-Feb-25	12:00 PM	5411 Old Hixson Pk	Manhole	S100J063	UNK ¹		North Chickamauga Creek	Construction/Maintenance Related
	26-Feb-25	12:00 PM	5411 Old Hixson Pk	Manhole	S100J050	UNK ¹		North Chickamauga Creek	Construction/Maintenance Related

January 1, 2025 – March 31, 2025									
SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
35	28-Feb-25	3:45 PM	5410 School Dr	Manhole	S100J030	UNK ¹	25	Storm Drain	Wet Weather
36	05-Mar-25	2:40 AM	122 Rowland Gap Rd (West Bank)	West Bank	S135O217	9.42	2,942,000	Tennessee River	Construction/ Maintenance Related
37	05-Mar-25	10:15 AM	4602 Gann Store Rd (Big Ridge #2)	Manhole	S111P018	2.25	675	Tennessee River	Power Failure from Power Source
38	06-Mar-25	1:30 PM	5611 Pinelawn Ave	Manhole	S157L028	1.75	1,050	Storm Drain	Construction/ Maintenance Related
39	13-Mar-25	9:20 AM	3851 Mark Twain Cr	Manhole	S137N065	2.08	3,125	Storm Ditch	Blockage - Trash/Debris
40	15-Mar-25	9:20 AM	5409 Old Hixson Pike (Hixson #2 PS)	Manhole	S100J058	UNK ¹	1,164,000	Storm Ditch	Construction/ Maintenance Related
41	15-Mar-25	10:30 AM	5611 Pinelawn Ave	Manhole	S157L028	25.17	75,500	Storm Drain	Construction/ Maintenance Related
42	15-Mar-25	12:15 PM	1015 Riverfront Pkwy (East Bank)	East Bank	S135O547	51.92	13,253,000	Tennessee River	Construction/ Maintenance Related
43	15-Mar-25	12:50 PM	122 Rowland Gap Rd (West Bank)	West Bank	S135O217	57.00	40,331,000	Tennessee River	Construction/ Maintenance Related
44	16-Mar-25	11:00 AM	600 River St	Manhole	S135L024	21.67	650,000	Tennessee River	Construction/ Maintenance Related
45	16-Mar-25	12:15 PM	404 River St (Tremont CSO)	Other	UNK ¹	31.25	163,125	Tennessee River	Construction/ Maintenance Related
46	16-Mar-25	1:45 PM	3816 Fagan St	Manhole	S167D046	2.00	3,600	Land*	Blockage - Trash/Debris
47	17-Mar-25	8:15 AM	143 Baylor School Rd	Manhole	S126G022	UNK ¹	50,000	Storm Ditch	Wet Weather
48	18-Mar-25	1:00 PM	600 River St	Manhole	S135L024	1.83	50,000	Tennessee River	Construction/ Maintenance Related

January 1, 2025 – March 31, 2025									
SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
49	19-Mar-25	9:00 AM	6854 Robin Dr	Manhole	S139P062	UNK ¹	5,000	Storm Ditch	Wet Weather
50	19-Mar-25	9:06 AM	4723 Jersey Pk	Manhole	S129B071	2.40	2,880	Storm Ditch	Blockage - Roots

¹ This information was not available at time of reporting.

² Common cause, within 500 yards of separate event.

* Did not reach waters of the United States.

3.0 Moccasin Bend EC Bypasses

The CD sets forth the same definition for bypass as the EPA's regulations at 40 C.F.R. § 122.41(m), which defines a bypass as the intentional diversion of waste streams from any portion of a treatment facility. The City's current NPDES permit defines a bypass as the intentional diversion of wastewater away from any portion of a treatment facility other than through peak excess flow treatment facilities or permitted outfalls in accordance with both the long-term control plan and the nine minimum technology-based effluent controls for combined sewer systems. The City reports bypasses and wet weather discharges separately on the monthly Discharge Monitoring Reports, as a discharge from the City's permitted wet weather discharge is not a bypass under the City's current NPDES permit. Based on the foregoing, the WWTP experienced no bypasses during the reporting period of January 1, 2025, through March 31, 2025.

4.0 CSO Outfall Discharges

For the reporting period of January 1, 2025, through March 31, 2025, Chattanooga experienced CSO discharges from CSO outfall treatment facilities as listed in Table 4-1. Paragraph 8.(h) of the CD defines a CSO as “any discharge from the CSS from any outfall currently identified, or identified in the future, as a permitted combined sewer overflow outfall in any Chattanooga NPDES permit from which CSOs are discharged to waters of the United States or the State.” The CSS is defined as the portion of Chattanooga’s wastewater collection and transmission system (“WCTS”) designed to convey municipal sewage (domestic, commercial and industrial wastewaters) and storm water runoff through a single-pipe system to Chattanooga’s WWTP or CSO outfalls. Chattanooga operates eight (8) permitted CSO outfall treatment facilities, seven (7) of which discharged during the reporting period.

Table 4-1
Quarterly CSO Outfall Discharge Report

January 1, 2025 – March 31, 2025						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
11-Feb-25	12:56 PM	Carter St CSO (009)	24.3	17.567534	Tennessee River	Rain Event
11-Feb-25	1:22 PM	19th St CSO (008)	47.1	44.144448	Tennessee River	Rain Event
11-Feb-25	4:06 PM	Central Ave CSO (002)	95.1	401.844578	Chattanooga Creek	Rain Event
11-Feb-25	5:30 PM	Citico CSO (004)	112	6.173643	Tennessee River	Rain Event
12-Feb-25	12:40 AM	East Bank (Formerly known as "MLK") CSO (007)	94.3	7.755200	Tennessee River	Rain Event
12-Feb-25	11:44 AM	Tremont CSO (005)	19.3	2.272958	Tennessee River	Rain Event
13-Feb-25	12:22 AM	Carter St CSO (009)	33	46.426914	Tennessee River	Rain Event
16-Feb-25	3:04 AM	19th St CSO (008)	4.7	5.422394	Tennessee River	Rain Event
16-Feb-25	3:24 AM	Central Ave CSO (002)	28	8.332434	Chattanooga Creek	Rain Event
15-Mar-25	9:28 AM	19th St CSO (008)	55.6	28.504596	Tennessee River	Rain Event
15-Mar-25	10:10 AM	East Bank (Formerly known as "MLK") CSO (007)	67	1.630234	Tennessee River	Rain Event
15-Mar-25	11:16 AM	Central Ave CSO (002)	132.8	126.679134	Chattanooga Creek	Rain Event
15-Mar-25	7:10 PM	Tremont CSO (005)	100.7	3.070324	Tennessee River	Rain Event
16-Mar-25	4:00 PM	Williams St CSO (003)	26.7	0.800411	Chattanooga Creek	Rain Event

Table 4-1
Quarterly CSO Outfall Discharge Report

January 1, 2025 – March 31, 2025						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
24-Mar-25	3:28 AM	19th St CSO (008)	5.5	2.870158	Tennessee River	Rain Event
31-Mar-25	6:10 AM	19th St CSO (008)	7.7	3.547694	Tennessee River	Rain Event