



City of Chattanooga

Mayor Tim Kelly

July 31, 2021

VIA CERTIFIED MAIL

Mr. Richard Elliott
Environmental Engineer
Clean Water Enforcement Branch
US EPA-Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: *United States of America et. al. v. City of Chattanooga, No. 1:12-cv-00245*
Quarterly Report No. 32 – April 1, 2021 to June 30, 2021

Dear Mr. Elliott:

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 thirty-second 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. Richard Elliott
July 31, 2021
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Please let me know if you have any questions regarding our submittal.

Sincerely,

Jeffrey A. Rose, P.E.
Director, Waste Resources Division

Enclosure

cc: Karl Fingerhood, Esq., US DOJ
Chief, Environmental Enforcement Section, US DOJ
Chief, Clean Water Enforcement Branch, US EPA Region 4
Paul Schwartz, Esq., US EPA
Sohnia Hong, Office of the Attorney General
Enforcement Coordinator, Water Pollution Control, TDEC
Brandi Prewitt, TN Clean Water Network
Adam Sowatzka, Esq., King & Spalding
Mike Marino, P.E., Jacobs Engineering



Quarterly Report No. 32

April 1, 2021 – June 30, 2021

Prepared for

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

City of Chattanooga
Waste Resources Division
Consent Decree Program
Case No. 1:12-cv-00245

Prepared by

City of Chattanooga
Waste Resources Division

Submitted by

Jacobs

Jacobs Engineering Group Inc.
Consent Decree Program Manager

Chattanooga, Tennessee

July 31, 2021

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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 Waste Water Treatment Plant
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. 32 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 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 April 1, 2021 through June 30, 2021, 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 Report**

SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
1	15-Apr-21	9:30 AM	1210 Mercer Dr	Main Line	UNK ²	31.00	50	Storm Ditch	Break
2	15-Apr-21	6:30 PM	6521 Grubb Rd	UNK ²	UNK ²	25.50	50	Structure*	Blockage - Trash/Debris
3	20-Apr-21	11:30 AM	800 Woodmore Ln	Service Line	UNK ²	7.00	420	Storm Ditch	Blockage - Roots
4	26-Apr-21	9:00 AM	4350 Bellview Ave	Manhole	S129I788	2.25	20,250	Storm Ditch	Blockage - Gravel
5	13-May-21	8:15 AM	1210 Mercer St	Main Line	UNK ²	124.75	25,000	Tennessee River	Break
6	18-May-21	1:30 PM	4800 Swann Rd	Manhole	S129C003	1.50	4,500	Storm Ditch	Blockage - Trash/Debris
7	19-May-21	12:00 PM	615 Derby St	Manhole	S146E026	2.00	120	Storm Drain	Blockage - Trash/Debris
8	24-May-21	9:00 AM	615 Derby St	Manhole	S146E026	4.00	6,000	Storm Drain	Blockage - Trash/Debris
9	25-May-21	3:00 PM	1806 Auburndale Ave	Service Line	UNK ²	2.33	700	Storm Drain	Blockage - Trash/Debris
10	01-Jun-21	10:30 AM	6153 Hickory Valley Rd	Main Line	UNK ²	5.75	1,725	Storm Ditch	Blockage - Roots
11	02-Jun-21	10:00 AM	4350 Bellview Ave	Manhole	S129I788	1.33	2,000	Storm Ditch	Blockage - Gravel
12 ¹	03-Jun-21	1:30 PM	1820 E 23rd St	Manhole	S156G049	4.00	71,000	Dobbs Branch	Wet Weather
13 ¹	03-Jun-21	1:45 PM	2001 S Kelley St	Manhole	S156G030	4.00	30,000	Dobbs Branch	Wet Weather
14	03-Jun-21	2:45 PM	3418 St Elmo St	Service Line	UNK ²	UNK ²	20	Structure*	Wet Weather
15	03-Jun-21	3:00 PM	1900 E 25th St	Manhole	S156J057	3.50	1,050	Storm Drain	Wet Weather
16	03-Jun-21	3:35 PM	107 W 38th St	Manhole	S155N071	22.92	6,925	Storm Drain	Wet Weather
17	03-Jun-21	6:30 PM	511 W 38th St	Manhole	S155N049	15.50	4,650	Storm Drain	Wet Weather
18 ¹	07-Jun-21	12:30 PM	1900 E 25th St	Manhole	S156J057	2.50	1,350	Storm Drain	Blockage - Grease
19	09-Jun-21	10:30 AM	1210 Mercer St	Service Line	UNK ²	10.25	6,675	Tennessee River	Break

**Table 2-1
Quarterly SSO Report**

SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
20	28-Jun-21	10:00 AM	1806 Auburndale Ave	Service Line	UNK ²	UNK ²	20	Storm Drain	Blockage - Trash/Debris

¹ Common cause, within 500 yards of separate event.

² This information was not available at time of reporting.

* Did not reach waters of the United States

3.0 Moccasin Bend WWTP 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 April 1, 2021 through June 30, 2021.

4.0 CSO Outfall Discharges

For the reporting period of April 1, 2021 through June 30, 2021, 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, eight (8) of which discharged during the reporting period.

**Table 4-1
Quarterly CSO Outfall Discharge Report**

April 1, 2021 – June 30, 2021						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
01-Apr-21	12:00 AM	Williams St CSO (003)	103.85	3.316327	Chattanooga Creek	Rain Event
01-Apr-21	12:00 AM	Citico CSO (004)	47.1	12.956137	Tennessee River	Rain Event
01-Apr-21	12:00 AM	ML King CSO (007)	14.88	0.036336	Tennessee River	Rain Event
05-Apr-21	8:15 AM	Central Ave CSO (002)	2	0.008088	Chattanooga Creek	Rain Event
24-Apr-21	10:22 AM	19th St CSO (008)	1.58	0.113504	Tennessee River	Rain Event
24-Apr-21	10:24 AM	Carter St CSO (009)	3.42	2.058697	Tennessee River	Rain Event
24-Apr-21	11:05 AM	ML King CSO (007)	4.45	0.242197	Tennessee River	Rain Event
24-Apr-21	11:47 AM	Central Ave CSO (002)	14.62	1.054578	Chattanooga Creek	Rain Event
04-May-21	11:27 AM	Tremont CSO (005)	0.23	0.045571	Tennessee River	Rain Event
04-May-21	12:56 PM	Carter St CSO (009)	5.94	2.396878	Tennessee River	Rain Event
04-May-21	3:22 PM	ML King CSO (007)	6.07	0.342867	Tennessee River	Rain Event
04-May-21	3:58 PM	Central Ave CSO (002)	21.67	3.749407	Chattanooga Creek	Rain Event
04-May-21	8:28 PM	19th St CSO (008)	0.47	0.040361	Tennessee River	Rain Event
03-Jun-21	11:48 AM	19th St CSO (008)	6.25	2.541752	Tennessee River	Rain Event
03-Jun-21	12:12 PM	Tremont CSO (005)	1.5	1.181040	Tennessee River	Rain Event
03-Jun-21	12:17 PM	Ross's Landing CSO (006)	3.18	9.976084	Tennessee River	Rain Event
03-Jun-21	12:21 PM	ML King CSO (007)	7.7	2.944735	Tennessee River	Rain Event
03-Jun-21	12:37 PM	Carter St CSO (009)	7.88	15.251433	Tennessee River	Rain Event
03-Jun-21	12:52 PM	Central Ave CSO (002)	57.5	33.138572	Chattanooga Creek	Rain Event
03-Jun-21	12:55 PM	Williams St CSO (003)	37.88	3.024159	Chattanooga Creek	Rain Event
03-Jun-21	12:58 PM	Citico CSO (004)	12.04	21.201208	Tennessee River	Rain Event