



City of Chattanooga

Mayor Andy Berke

January 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. 30 – October 2020 to December 2020**

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 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

January 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
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Quarterly Report No. 30

October 1, 2020 – December 31, 2020

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

February 1, 2020

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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. 30 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 October 1, 2020 through December 31, 2020, 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	03-Oct-20	4:45 PM	1919 Old Wauhatchie Pike	Manhole	S155J014	3.25	975	Storm Drain	Blockage - Trash/Debris
2	08-Oct-20	10:00 PM	371 Whitehall Rd	Manhole	S135G015	UNK ²	10	Storm Drain	Blockage - Trash/Debris
3	12-Oct-20	2:30 PM	455 Moccasin Bend Rd	UNK ²	UNK ²	0.50	30	Storm Drain	Eq flow rate exceeded
4	19-Oct-20	9:30 AM	1224 Franklin Dr	UNK ²	UNK ²	UNK ²	50	Structure*	Blockage - Trash/Debris
5	26-Oct-20	4:50 PM	1505 Dodson Ave	Service Line	UNK ²	4.67	7,000	Storm Ditch	Blockage - Grease
6	28-Oct-20	3:30 PM	4602 Gann Store Rd (Big Ridge #2)	Manhole	S119D016	25.00	225,000	Storm Drain	Wet Weather
7 ¹	29-Oct-20	6:00 AM	5203 Old Mission Rd (Golf Course PS)	Manhole	S157K070	6.00	189,750	South Chickamauga Creek	Wet Weather
8	29-Oct-20	6:00 AM	929 Riverside Dr (Citico PS)	Manhole	S136P800	1.00	30,000	Tennessee River	Wet Weather
9 ¹	29-Oct-20	6:20 AM	1724 Wilson St	Manhole	S136N015	1.92	4,125	Storm Drain	Wet Weather
10 ¹	29-Oct-20	8:15 AM	900 Terrace Ave	Manhole	S136A133	5.00	224,250	Storm Drain	Wet Weather
11 ¹	29-Oct-20	8:30 AM	25 S. Germantown Rd	Manhole	S157A056	5.00	16,500	Storm Drain	Wet Weather
12	29-Oct-20	8:30 AM	1022 Shallowford Rd	Manhole	S147G104	9.00	54,000	South Chickamauga Creek	Wet Weather
13	29-Oct-20	8:35 AM	1820 E 23rd St	Manhole	S156G049	4.42	33,125	Dobbs Branch	Wet Weather
14	29-Oct-20	8:36 AM	1033 Lupton Dr	Manhole	S118K036	24.90	373,250	Tennessee River	Wet Weather
15 ¹	29-Oct-20	8:40 AM	2001 S Kelley St	Manhole	S156G030	4.33	28,400	Dobbs Branch	Wet Weather
16	29-Oct-20	8:45 AM	601 Lupton Dr	Manhole	S118G055	5.00	33,000	Storm Ditch	Wet Weather
17	29-Oct-20	8:45 AM	1900 E 25th St	Manhole	S156J051	4.25	3,650	Storm Drain	Wet Weather
18 ¹	29-Oct-20	8:50 AM	3728 Wilcox Blvd	Manhole	S147B301	4.42	9,275	Storm Ditch	Wet Weather
19	29-Oct-20	9:00 AM	0 Aim Way	Manhole	S157H046	24.25	7,275	Storm Drain	Wet Weather
20	29-Oct-20	9:00 AM	3812 Provence	Manhole	S157H603	24.25	36,375	Storm Drain	Wet Weather

**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
21	29-Oct-20	9:15 AM	511 W 38th St	Manhole	S155N049	6.25	3,750	Storm Drain	Wet Weather
22	29-Oct-20	9:30 AM	1100 Lupton Dr	Manhole	S118L002	24.25	145,500	Tennessee River	Wet Weather
23 ¹	29-Oct-20	9:45 AM	3857 Birmingham Dr	Manhole	S118D128	4.00	12,000	Tennessee River	Wet Weather
24	29-Oct-20	10:00 AM	406 Brown Rd	Manhole	S158I059	3.75	22,500	South Chickamauga Creek	Wet Weather
25 ¹	29-Oct-20	10:00 AM	7724 Old Lee Hwy	Manhole	S139D002	23.67	355,000	Storm Ditch	Wet Weather
26	29-Oct-20	10:00 AM	5010 Creekside Preserve	Other	UNK ²	4.00	2,400	North Chickamauga Creek	Wet Weather
27 ¹	30-Oct-20	8:15 AM	600 Mountainwood Dr	Manhole	S099M066	2.25	3,375	Storm Drain	Wet Weather
28 ¹	05-Nov-20	9:30 AM	3324 Provence St	Manhole	S156D080	4.83	2,500	Storm Ditch	Blockage - Trash/Debris
29	08-Nov-20	3:45 PM	Frawley Rd	Manhole	S158O008	0.17	2,000	South Chickamauga Creek	Pump Station - Electrical Failure
30 ¹	10-Nov-20	9:30 AM	1706 Clayton Dr	Manhole	S158D032	3.75	200	Land*	Blockage - Trash/Debris
31	12-Nov-20	11:00 AM	6695 Hickory Brook Dr	Manhole	S138M082	UNK ²	300	Storm Drain	Wet Weather
32	17-Nov-20	11:00 AM	1073 Enclave Bay Dr	Manhole	S118K158	3.75	2,125	Land*	Blockage - Grease
33 ¹	07-Dec-20	10:30 AM	1912 Colonial Way Cr	Main Line	UNK ²	2.75	1,650	Storm Ditch	Defect(s)
34	14-Dec-20	10:30 AM	1020 Lupton Dr	Manhole	S118K006	20.75	200,250	Tennessee River	Wet Weather
35 ¹	24-Dec-20	7:00 AM	1020 Lupton Dr	Manhole	S118K006	1.50	382,500	Tennessee River	Wet Weather
36 ¹	24-Dec-20	8:09 AM	2109 Lynnbrook Ave	Manhole	S156G048	6.95	6,255	Dobbs Branch	Wet Weather
37	24-Dec-20	8:16 AM	2001 S Kelley St	Manhole	S156G030	6.95	14,595	Dobbs Branch	Wet Weather
38 ¹	24-Dec-20	8:22 AM	1022 Shallowford Rd	Manhole	S147G104	6.17	9,250	South Chickamauga Creek	Wet Weather
39	24-Dec-20	8:30 AM	914 Sterling Ave	Manhole	S136H107	6.25	9,375	Tennessee River	Wet Weather
40 ¹	24-Dec-20	8:54 AM	1900 E 25th St	Manhole	S156J057	6.40	21,780	Storm Drain	Wet Weather
41	28-Dec-20	8:30 AM	2506 York St	Manhole	S137A071	UNK ²	20	Land*	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 October 1, 2020 through December 31, 2020.

4.0 CSO Outfall Discharges

For the reporting period of October 1, 2020 through December 31, 2020, 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

October 1, 2020 – December 31, 2020						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
10-Oct-20	7:42 PM	Tremont CSO (005)	4.78	0.590725	Tennessee River	Rain Event
10-Oct-20	7:59 PM	ML King CSO (007)	22.77	2.004166	Tennessee River	Rain Event
10-Oct-20	7:59 PM	Carter St CSO (009)	7.35	4.211089	Tennessee River	Rain Event
10-Oct-20	8:10 PM	19th St CSO (008)	4.63	0.808540	Tennessee River	Rain Event
10-Oct-20	8:25 PM	Central Ave CSO (002)	46.23	14.958904	Tennessee River	Rain Event
10-Oct-20	10:43 PM	Ross's Landing CSO (006)	1.97	0.560505	Tennessee River	Rain Event
11-Oct-20	5:22 AM	Citico CSO (004)	10.48	1.519952	Tennessee River	Rain Event
28-Oct-20	10:50 AM	Tremont CSO (005)	1.82	0.592027	Tennessee River	Rain Event
28-Oct-20	11:10 AM	Carter St CSO (009)	2.63	1.283875	Tennessee River	Rain Event
28-Oct-20	11:20 AM	ML King CSO (007)	21.62	3.866064	Tennessee River	Rain Event
28-Oct-20	11:29 AM	19th St CSO (008)	5.45	2.520858	Tennessee River	Rain Event
28-Oct-20	11:39 AM	Ross's Landing CSO (006)	0.7	0.617029	Tennessee River	Rain Event
28-Oct-20	12:35 PM	Central Ave CSO (002)	18.55	14.446353	Tennessee River	Rain Event
29-Oct-20	3:27 AM	Carter St CSO (009)	5.72	7.406396	Tennessee River	Rain Event
29-Oct-20	3:31 AM	Tremont CSO (005)	7.57	3.440275	Tennessee River	Rain Event
29-Oct-20	4:36 AM	Citico CSO (004)	18.2	12.167993	Tennessee River	Rain Event
29-Oct-20	4:43 AM	Ross's Landing CSO (006)	2.63	8.457568	Tennessee River	Rain Event
11-Nov-20	5:24 PM	19th St CSO (008)	0.4	0.006814	Tennessee River	Rain Event
11-Nov-20	5:32 PM	Citico CSO (004)	27.8	6.502922	Tennessee River	Rain Event
11-Nov-20	5:38 PM	Tremont CSO (005)	0.43	0.035805	Tennessee River	Rain Event
11-Nov-20	5:47 PM	ML King CSO (007)	2.65	0.089718	Tennessee River	Rain Event
11-Nov-20	5:59 PM	Carter St CSO (009)	0.93	0.362071	Tennessee River	Rain Event
11-Nov-20	6:15 PM	Central Ave CSO (002)	16.4	1.284240	Tennessee River	Rain Event
14-Dec-20	1:43 AM	Tremont CSO (005)	4.2	0.672219	Tennessee River	Rain Event
14-Dec-20	1:57 AM	19th St CSO (008)	3.88	0.891613	Tennessee River	Rain Event

Table 4-1
Quarterly CSO Outfall Discharge Report

October 1, 2020 – December 31, 2020						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
14-Dec-20	2:06 AM	Carter St CSO (009)	5.35	3.993566	Tennessee River	Rain Event
14-Dec-20	2:55 AM	ML King CSO (007)	9.73	0.934686	Tennessee River	Rain Event
14-Dec-20	3:02 AM	Central Ave CSO (002)	15.92	7.675748	Tennessee River	Rain Event
14-Dec-20	3:38 AM	Ross's Landing CSO (006)	2.07	2.132726	Tennessee River	Rain Event
14-Dec-20	4:00 AM	Citico CSO (004)	1.2	0.762558	Tennessee River	Rain Event
24-Dec-20	4:12 AM	Tremont CSO (005)	6.17	0.902794	Tennessee River	Rain Event
24-Dec-20	4:48 AM	ML King CSO (007)	9.65	0.958200	Tennessee River	Rain Event
24-Dec-20	4:53 AM	19th St CSO (008)	3.77	0.666246	Tennessee River	Rain Event
24-Dec-20	4:54 AM	Citico CSO (004)	39.44	8.058718	Tennessee River	Rain Event
24-Dec-20	5:00 AM	Carter St CSO (009)	6.07	6.729699	Tennessee River	Rain Event
24-Dec-20	5:08 AM	Ross's Landing CSO (006)	3.77	3.058618	Tennessee River	Rain Event
24-Dec-20	5:44 AM	Central Ave CSO (002)	20.72	8.394482	Tennessee River	Rain Event
24-Dec-20	12:32 PM	Williams St CSO (003)	3.22	0.113647	Tennessee River	Rain Event