



# City of Chattanooga

Mayor Tim Kelly

July 31, 2024

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. 44 – April 1, 2024 to June 30, 2024**

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-third 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  
July 31, 2024  
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Please let me know if you have any questions regarding our submittal.

Sincerely,

  
Mark Heinzer (Jul 27, 2024 21:16 EDT)

Mark Heinzer, P.E.  
Administrator, Wastewater Department

Enclosure

cc:

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Chattanooga



# Quarterly Report No. 44

**April 1, 2024 – June 30, 2024**

*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

July 31, 2024



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# Acronyms and Abbreviations

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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

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## 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. 44 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

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For the reporting period of April 1, 2024, through June 30, 2024, 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**

April 1, 2024 – June 30, 2024									
SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
1	02-Apr-24	9:45 AM	76 N Crest Rd	Manhole	S146L082	2.83	170	Land*	Blockage - Roots
2	19-Apr-24	10:30 AM	152 Signal Hills Dr	Manhole	S117O006	3.00	360	Storm Drain	Blockage - Gravel
3	04-May-24	12:11 PM	1003 Dartmouth St.	Manhole	S127P060	2.82	22,500	Storm Drain	Blockage - General
4	09-May-24	7:00 AM	929 Riverside Dr (Citico PS)	Manhole	S136P008	1.00	90,000	Tennessee River	Power Failure from Power Source
5	09-May-24	8:00 AM	Terrace Ave & Young Ave	Manhole	S136A130	24.65	73,950	Tennessee River	Wet Weather
6	09-May-24	8:00 AM	4600 Gann Store Rd (Big Ridge #2 PS)	Manhole	S119D016	1.00	3,000	Storm Ditch	Power Failure from Power Source
7	09-May-24	9:10 AM	5203 Old Mission Rd (Brainerd Golf Course PS)	Manhole	S157F059	19.27	29,400	Storm Drain	Wet Weather
8	09-May-24	9:20 AM	Old Mission Rd	Manhole	S157K056	23.53	141,200	Storm Drain	Wet Weather
9 <sup>2</sup>	09-May-24	10:00 AM	1820 E 23rd St	Manhole	S156G049	22.57	257,150	Dobbs Branch	Wet Weather
10	09-May-24	10:39 AM	1022 Shallowford Rd	Manhole	S147G104	22.42	195,750	South Chickamauga Creek	Wet Weather
11 <sup>2</sup>	09-May-24	10:44 AM	2001 S Kelley St	Manhole	S156G030	21.90	33,318	Dobbs Branch	Wet Weather
12 <sup>2</sup>	09-May-24	11:00 AM	6695 Hickory Brook Dr	Manhole	S138M082	22.57	34,398	Storm Drain	Wet Weather
13 <sup>2</sup>	09-May-24	11:05 AM	3470 Van Buren St	Manhole	S118G114	21.25	40,425	Storm Drain	Wet Weather
14	09-May-24	11:35 AM	6800 Robin Dr	Manhole	S138L005	21.90	61,700	Storm Drain	Wet Weather

April 1, 2024 – June 30, 2024									
SSO ID	Start Date	Start Time	Location	Source	MH ID#	Estimated Duration (hrs)	Estimated Volume (gal)	SSO Destination	Cause
15	09-May-24	12:27 PM	511 W 38th St	Manhole	S155N049	19.90	2,388	Storm Drain	Wet Weather
16	09-May-24	2:05 PM	5409 Old Hixson Pike (Hixson #2 PS)	Manhole	S100J051	37.52	337,650	Storm Drain	Wet Weather
17	09-May-24	3:00 PM	4301 Amnicola Hwy (River Park PS #1)	Pump Station	UNK <sup>1</sup>	13.00	780	Land*	Power Failure from Power Source
18	09-May-24	4:30 PM	1024 Dartmouth Street	Manhole	S127P068	2.00	600	Storm Drain	Wet Weather
19	15-May-24	8:00 AM	455 Moccasin Bend Rd	Main Line	UNK <sup>1</sup>	1.00	1,500	Storm Drain	Sudden flow increase
20	27-May-24	8:00 AM	2720 Folts Dr	Manhole	S127A025	2.25	1,350	Storm Drain	Blockage - Trash/Debris
21	02-Jun-24	3:34 PM	1424 Cloverdale Circle	Manhole	S110H019	24.28	14,570	Storm Drain	Blockage - Grease
22	06-Jun-24	10:30 AM	1400 Citico Ave	Manhole	S146C004	UNK <sup>1</sup>	75,000	Storm Ditch	Wet Weather
23	07-Jun-24	3:30 PM	1400 Citico Ave	Manhole	S146C004	22.17	75,000	Storm Ditch	Blockage - Trash/Debris
24	24-Jun-24	3:00 PM	3483 Northrop St	Service Line	UNK <sup>1</sup>	0.50	5	House*	Blockage - Trash/Debris
25	27-Jun-24	1:00 PM	3800 South Terrace	Main Line	UNK <sup>1</sup>	1.75	50	Storm Ditch	Construction/ Maintenance Related

<sup>1</sup> This information was not available at time of reporting.

<sup>2</sup> Common cause, within 500 yards of separate event.

\* Did not reach waters of the United States.

## 3.0 Moccasin Bend EC Bypasses

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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, 2024, through June 30, 2024.

## 4.0 CSO Outfall Discharges

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For the reporting period of April 1, 2024, through June 30, 2024, 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, four (4) of which discharged during the reporting period.

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

April 1, 2024 – June 30, 2024						
Start Date	Start Time	Location/Nearest Stream	Duration (hrs)	Volume (MG)	Receiving Water	Cause
02-Apr-24	11:30 PM	Tremont CSO (005)	9.75	0.130398	Tennessee River	Rain Event
09-Apr-24	7:16 AM	Tremont CSO (005)	8	0.096950	Tennessee River	Rain Event
09-May-24	1:02 AM	19th St CSO (008)	14.3	15.803530	Tennessee River	Rain Event
09-May-24	3:00 AM	Tremont CSO (005)	11.1	1.343802	Tennessee River	Rain Event
09-May-24	6:06 AM	Citico CSO (004)	73.8	110.890034	Tennessee River	Rain Event
09-May-24	9:16 AM	Central Ave CSO (002)	61.3	5.227074	Chattanooga Creek	Rain Event
27-May-24	4:28 AM	Tremont CSO (005)	0.4	0.101356	Tennessee River	Rain Event
27-May-24	4:28 AM	19th St CSO (008)	5.4	9.578324	Tennessee River	Rain Event
27-May-24	5:02 AM	Citico CSO (004)	49.9	2.063554	Tennessee River	Rain Event
27-May-24	6:08 AM	Central Ave CSO (002)	48.8	8.158610	Chattanooga Creek	Rain Event
02-Jun-24	5:12 AM	19th St CSO (008)	7.5	3.308434	Tennessee River	Rain Event
02-Jun-24	7:34 AM	Citico CSO (004)	25.4	6.613912	Tennessee River	Rain Event
02-Jun-24	9:30 AM	Central Ave CSO (002)	15.6	3.517736	Chattanooga Creek	Rain Event