



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
CHATTANOOGA ENVIRONMENTAL FIELD OFFICE

1301 RIVERFRONT PARKWAY, SUITE 206
CHATTANOOGA, TENNESSEE 37402
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November 1, 2018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7016 0750 0000 2820 1869

Mark Harrison, WWTa Executive Director
Mike Moon WWTa Chairman

Hamilton County Water & Wastewater Authority
1250 Market Street, Suite 3050
Chattanooga, TN 37402-2713

Re: **Notice of Violation (NOV)**
State Operating Permit Number SOP-89044
Hamilton County Water & Wastewater Authority

Dear Sirs:

In a review of the Monthly SSO reports you submitted this year, there have been 29 SSOs in the Ooltewah basin from October 2017 to present. Our review also found that more than five overflows occurred at three (3) specific manholes. To maintain compliance with your permit, you must implement a self-imposed moratorium in this area.

Permit Verification

Hamilton County Wastewater Treatment Authority (WWTa) has coverage under the State Operating Permit Tracking Number SOP-89044 which became effective on October 1, 2014 and expires on July 31, 2019. This permit authorizes the operation of a municipal wastewater collection system. The Hamilton County Water & Wastewater Authority is authorized to collect and transport untreated municipal wastewater to the Chattanooga interceptor sewerage system.

Review of Monthly SSO Reports

WWTa reports its SSOs via email and sends a summary to DWR each month. The following SSOs were reported in the Ooltewah area. Each SSO is a separate violation of Part C.3.b. of your permit.

Ooltewah MH04307-02

- September 4, 2018 MH 04307-02 discharged 500 gallons to Roger's Branch
- August 20, 2018 MH 04307-02 discharged 1,875 gallons to Roger's Branch
- August 17, 2018 MH 04307-02 discharged 37,531 gallons to Roger's Branch
- August 12, 2018 MH 04307-02 discharged 7,875 gallons to Roger's Branch
- August 2, 2018 MH 04307-02 discharged 3,500 gallons to Roger's Branch
- July 21, 2018 MH 04307-02 discharged 36,875 gallons to Roger's Branch
- June 29, 2018 MH 04307-02 discharged 15,000 gallons to Roger's Branch
- April 24, 2018 MH 04307-02 discharged 14,438 gallons to land
- October 9, 2017 MH 04307-02 discharged 107,376 gallons to Roger's Branch

Ooltewah MH04307-03

- September 24, 2018 MH 04307-03 discharged 223,500 gallons to Roger's Branch
- September 10, 2018 MH 04307-03 discharged 9,250 gallons to Roger's Branch
- August 20, 2018 MH 04307-03 discharged 1,875 gallons to Roger's Branch
- August 17, 2018 MH 04307-03 discharged 25,053 gallons to Roger's Branch
- August 12, 2018 MH 04307-03 discharged 12,000 to Roger's Branch
- August 2, 2018 MH 04307-03 discharged 3,500 gallons to Roger's Branch
- July 21, 2018 MH 04307-03 discharged 36,875 gallons to Roger's Branch
- April 24, 2018 MH 04307-03 discharged 49,109 gallons to land

Ooltewah MH04307-04

- September 24, 2018 MH 04307-04 discharged 921,938 gallons to Roger's Branch
- September 10, 2018 MH 04307-04 discharged 18,500 gallons to Roger's Branch
- September 4, 2018 MH 04307-04 discharged 5,000 gallons to Roger's Branch
- August 20, 2018 MH 04307-04 discharged 18,750 gallons to Roger's Branch
- August 12, 2018 MH04307-04 discharged 73,750 gallons to Roger's Branch

Ooltewah MH04307-01B (Snow Hill Pump Station)

- October 28, 2018 Snow Hill Pump station malfunctioned and discharged
- September 4, 2018 MH04307-01B 100 gallons
- April 24, 2018 MH04307-01B 25 gallons to land

Ooltewah MH99326-A09 and A09X (8402 Streamside Dr.)

- September 24, 2018 MH99326-A09 discharged 490,750 to Roger's Branch
- August 26, 2018 MH99326-A09X discharge 500 gallons to Roger's Branch
- August 13, 2018 MH99326-A09 discharged 38,000 gallons to Roger's Branch
- October 16, 2017 MH99326-A09X discharge 29,250 gallons to Roger's Branch

Your permit also requires that you specify what actions, if any, are taken to prevent adverse impacts to Waters of the State.

Violations:

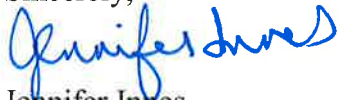
- 29 SSOs in the Ooltewah Basin during 2018. Each SSO is a violation of Part C.3.b. of your permit.
- 9 of the SSOs occurring in Ooltewah from MH 04307-02 resulted in a discharge to Roger's Branch. Each discharge to Waters of the State is a violation of TCA 69-3-114 (a).
- 8 of the SSOs occurring in Ooltewah from MH 04307-03 resulted in a discharge to Roger's Branch. Each discharge to Waters of the State is a violation of TCA 69-3-114 (a).
- 5 of the SSOs occurring in Ooltewah from MH04307-04 resulted in a discharge to Roger's Branch. Each discharge to Waters of the State is a violation of TCA69-3-114 (a).
- 3 of the SSOs occurring in Ooltewah were from Snow Hill Pump Station and MH04307-01B
- 2 of the SSOs occurring at MH 99326-A09 (8402 Streamside Dr.) which resulted in a discharge to Roger's Branch. Each discharge to Waters of the State is a violation of TCA69-3-114 (a).
- 2 of the SSOs occurring at MH 99326-A09X (8402 Streamside Dr.) which resulted in a discharge to Roger's Branch. Each discharge to Waters of the State is a violation of TCA69-3-114 (a).
- On SSO reports, WWTA does not specify what actions, if any, are taken to prevent adverse impacts to Waters of the State. This is a violation of Part C.4. of your permit.

Required Actions:

- According to Part C.3.c. of your permit, you must enact a self-imposed moratorium for this basin. Please provide documentation within 30 days of receipt of this letter that this requirement has been met.
- According to Part F. of your permit, you must place signs any bypass/overflow point that has discharged five (5) or more times in the last year. Please provide documentation within 30 days of receipt of this letter that this requirement has been met.

If you have any questions, please contact Ms. Angela Oberschmidt at (423) 634-5708.

Sincerely,



Jennifer Innes
Program Manager
Division of Water Resources

Enclosed: Figures showing manhole locations

cc: Jim Adams, WWTA Commissioner
Peter Avisto, WWTA Commissioner
Billy Cooper, WWTA Commissioner
Kenny Custer, WWTA Commissioner
Boyd Veal, WWTA Commissioner
Tyler Howell, WWTA Commissioner
Curtis Jones, WWTA Commissioner
Walker Jones, WWTA Commissioner
Bill McGriff, WWTA Treasurer
Ed Watt, WWTA Commissioner
Michael Bascom, TDEC



Figure 1. Snow Hill Road. Note proximity to Roger’s Branch

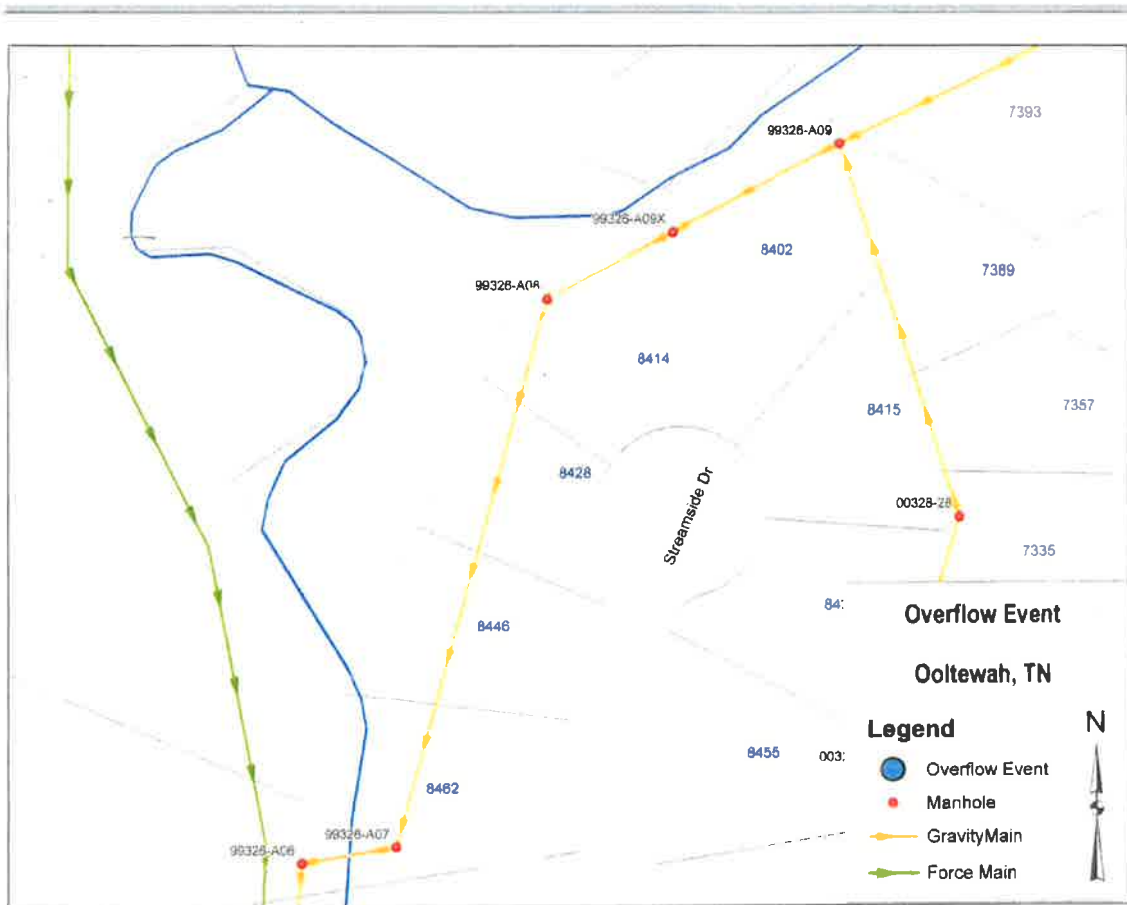


Figure 2. 8402 Streamside Drive. The stream indicated by the blue line is Roger's Branch.