

United States Environmental Protection Agency Region 4

Enforcement and Compliance Assurance Division

Water Enforcement Branch

61 Forsyth Street, SW

Atlanta, Georgia 30303



**Wastewater Collection and Transmission System
Compliance Evaluation Inspection Report**

City of Sevierville (McCroskey Island) STP

NPDES Permit Number: TN0063959

Project No. SS-TN0063959-03072024

Facility Address:

2295 McCroskey Island Road,
Sevierville, TN 37876

Inspection Date:

March 7, 2024

Inspectors:

Mel-Chilecee Taylor, EPA Region 4

Andrew Gunderson, EPA Region 4

Brad Ammons, EPA Region 4

Inspection Report Prepared by:

Mel-Chilecee Taylor

Title and Approval Sheet

Title: City of Sevierville (McCroskey Island) STP, Sevierville, Tennessee Compliance Evaluation Report
Project No. SS- TN0063959-03072024

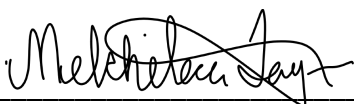
Approving Official:

**JAIRO
CASTILLO**

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CASTILLO
Date: 2024.05.03 06:52:33
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Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Enforcement Officer:



Mel-Chilecee Taylor, Inspector
Wastewater Enforcement Section
Water Enforcement Branch

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1. OVERVIEW

On March 7, 2024, the EPA conducted a Compliance Evaluation Inspection (CEI) of the City of Sevierville's sewer system. The purpose of this CEI was to evaluate compliance with the CWA and the City's National Pollutant Discharge Elimination System (NPDES) permit (permit # TN0063959) as it relates to the sanitary sewer wastewater collection and transmission system (WCTS) and to assess the City's Management, Operations, and Maintenance (MOM) programs.

This inspection was conducted under the authority of Section 308 of the Clean Water Act (CWA), as amended. This report presents the results of the inspection.

The City of Sevierville (City) Wastewater Treatment Department provides sanitary sewer services for residential, commercial, and industrial entities within the City of Sevierville, Tennessee. The city owns and operates one wastewater treatment plant, and 94 pump stations. The miles of gravity pipe owned by the city was not readily available.

2. OBJECTIVE

The objective of this inspection was to evaluate the general condition of the WCTS and to evaluate the City's operations and maintenance practices. Additionally, the EPA was to ascertain the use of any MOM programs that may be implemented by the City and to offer compliance assistance as needed. Specific tasks included conducting an opening conference, interview City staff, conducting a site visit of selected portions of the WCTS, and a closing conference.

3. INVESTIGATION METHODS

The investigation included:

- Review of the Integrated Compliance Information System database and the NPDES Permit;
- Interviews with the City's Wastewater Department personnel; and,
- Visual inspection.

4. REGULATORY SUMMARY

The City NPDES permit was issued on May 1, 2020, and expires on April 30, 2025. NPDES permit requirements most applicable to the WCTS includes:

- i. Section 2.3.2 (Noncompliance Notification - Twenty-Four Hour Reporting) requires the City to report any non-compliance that may endanger health or the environment within 24 hours "from the time the permittee becomes aware of the circumstances."
- ii. Section 2.1.4 (Proper Operation, Maintenance, and Replacement) requires the City to properly operate, maintain, and replace parts and equipment for the wastewater treatment plant and the associated collection system, (i.e., the WCTS).

The Clean Water Act (CWA) Section 301, 33 U.S.C. § 1311, states that it is unlawful for any person

to discharge any pollutant into waters of the United States without authorization under specific provisions of the CWA, including § 402 (NPDES) or § 404 (discharge of dredged or fill material).

Section 402, 33 U.S. Code § 1342, of the Clean Water Act requires that a discharge of any pollutant or combination of pollutants to surface waters that are deemed waters of the United States be regulated by a NPDES permit.

Sanitary Sewer Overflows (SSOs) are discharges of untreated sewage from any part of the WCTS that is not identified in the NPDES permit as a permitted outfall. SSOs that reach waters of the U.S. are prohibited discharges based on Section 301 of the CWA. SSOs that discharge into storm water sewers, drainage ditches, and unnamed tributaries which reach waters of the U.S. are also prohibited. Section 2.3.2 of the NPDES permit requires the City to report SSOs to the Tennessee Department of Environment and Conservation (TDEC) within 24 hours of discovery.

SSOs that do or do not reach waters of the U.S. could be indicative of improper operation and maintenance of the WCTS as required by Section 2.1.4 of the NPDES permit.

5. INSPECTION SUMMARY AND FINDINGS

The EPA performed an inspection of the City where EPA personnel reviewed SSO reports that were provided by the City. This section will provide a summary of the inspection, including associated pre-and/or post-inspection activity, as well as any recommendations to the City to improve performance of the WCTS.

- a. Analysis of SSOs
- b. The City uses “Red Hot” for controlling roots in the sewers. The last few reported Sanitary Sewer Overflows (SSOs) were from the bypass pump at the 36” interceptor lining project at the river crossing. Chad Parton does all SSO reporting to TDEC. All citizen complaints go through City Hall during work hours and staff add them to the work order system. The City reported a total of 94 lift stations within the system. There are 84 that are on Supervisory Control and Data Acquisition (SCADA) and 10 are not on SCADA. In the mornings, the crews check SCADA for any anomalies and check those stations first. Single phase stations seem to have the most issues and they are moving to 3 phase (new control panels; about 4 of 13 pump stations currently contracted have been completed). One of the crew members is responsible of conducting grease trap inspections and another crew member assist him with also doing inventory of parts for the pump stations. None of the pump stations have on-site backup generators, but the City has 3 portable generators in case of power failure. Mr. Loveday stated there are 3 main influent feeds to the STP (Kodak; Seymour; Davis Lane (largest PS in system)). Mr. Loveday also mentioned that they have about 1,500 single customer pumps (“E1” in their CMOM Reports on TDEC’s website) and that E1 calls are done through an electronic work order system. The City also has 1 River crossing that was leaking (contractors working on it now). Have an annual budget of \$250,000 for CMOM/Rehabilitation.

c. Management, Operations and Maintenance Program.

For the few lift stations that are not tied into SCADA, the operators keep a log of when each lift station is checked and then put into an annual Capacity, Management, Operations, and Maintenance (CMOM) report to TDEC. The CMOM report is reported to TDEC annually in October. Nine employees are on staff for the WCTS, that are broken up into three crews. These crews are placed in a service truck with three in each truck. Each team has assigned lift stations and they are to be inspected daily. They check control panels, manipulate high level pumps, check wet wells, look for any spills, etc. Each morning each team looks through SCADA at their assigned lift stations to see if there are any issues showing for a lift station. If an issue is identified at a lift station or complaint is called in, it is tagged by City Hall to a work order. That work order is relayed into SCADA which is sent out to the assigned team of that area/lift station. Any updates or resolution of the complaint is relayed back into SCADA and later also noted on any monthly reports.

d. Site Inspections

Refer to Enclosure 1 (Photographs) for pictures taken on March 7th.

- i. Photo 1 is the manhole next to the Stables Lift Station. Manholes are inspected with a camera on a weekly basis, where pictures are taken and uploaded in GIS. During the inspection, one of the service workers used an Insta 360 camera to demonstrate how manholes are inspected.
- ii. Photos 2 through 4 are lift stations (Stables Lift Station, Davis Lane Lift Station, and Kodak Lift Station, respectively) in Sevierville.
 - a. Stables Lift Station: alarm system and both pumps were operational, no spills noted, station upgraded in 2020, has a flow meter (FLEXIM) which is determined based on time. Lift station was fenced and locked and signage displayed with City contact information. Minor grease and trash buildup in wet well, and station has a generator connect.
 - b. Davis Lane Lift station: All new pumps (4 pumps: 3- 75 Horsepower and 1- 80 Horsepower pumps), no audible alarm but the lift station is on SCADA. Has a generator connected as well as an automatic generator transfer switch, no spills noted, lift station was fenced and locked and signage displayed with City contact information. Wet well was epoxy coated during recent rehabilitation.
 - c. Kodak Lift station: a three-pump system (25 Hp, 15 Hp, and 10 Hp) also on SCADA. The lift station is connected to a generator, was observed fenced and locked, and signage displayed with City contact information.

6. RECOMMENDATIONS AND CONCLUSION

The City should develop and implement a program for sewer assessment and rehabilitation to remove Inflow and Infiltration (I&I). The City can refer to EPA Region 4's *Guide to Collection and*

Transmission System Management, Operation, and Maintenance Programs that can be found on EPA's website at <https://www.epa.gov/enforcement/region-4-management-operations-and-maintenance-program-guidance-sanitary-sewer>.

Enclosure 1 – SSO Report

COMPLIANCE EVALUATION INSPECTION REPORT
City of Sevierville, Project No. CS-TN0063959-03072024



City of Sevierville

Service Order

Job Date: 3/4/2024 7:50 AM
Job Code: MISC - MISC/ NO MTR INFO
Group: Admin
Staff: BRADLEY FRANKLIN

Service Order #: SO0194218
Job Action: Miscellaneous
Issued By:
Requested By: REBEKAH K HUNTER

Location: 917 CENTRAL AVE 1 SEVIERVILLE TN 37862
Account: 107-20850-20 REBEKAH K HUNTER

Services

Service	Action	Current Meter #	Meter Serial #	Remote Id #	Scale	Last Read	Reading	New Meter #	Set Reading
100 -WATER	No Action	09635807	20345884	09635807	1	2011			
200 -SEWER	No Action								

Order Notes: DAUPLER 3/1/24 @ 3:56 PM
LEAK IN ROAD

Completion Notes: Cleared Blockage - Cleaned up Area and disinfected with Lime
Report Filed 3-6-24

Completion Date: 3-1-24

Worked By: JP - JW

Approved By: CP

COMPLIANCE EVALUATION INSPECTION REPORT
City of Sevierville, Project No. CS-TN0063959-03072024

**CITY OF SEVIERVILLE
BYPASS / OVERFLOW LOG SHEET**

DATE: 3-1-24
RAINFALL: 0.5 Event

Location of Bypass / Overflow	Nearest Stream	Duration of Overflow		Gallons	Reason for Overflow / Remedial Action
		From:	To:		
Central Ave	None	4:00pm	7:30pm	10,500	Sewer blockage knocked out blockage cleaned up Area disinfected with lime
RESPONDED BY:	Justin Peterson				
CALL TIME:	4:00pm				
TIME ARRIVED:	4:30pm				
SAMPLES TAKEN:	None				
Comments: NO stream in Area or staining					

NOTE: As per NPDES permit # TN0063959

In the case of any noncompliance which could cause a threat to public drinking water supplies, or any discharge which could constitute a threat to human health or the environment, the required notice of non-compliance shall be provided to the Division of Water Pollution Control in the appropriate Environmental Assistance Center within 24 - hours from the time the permittee becomes aware of the circumstances.

LEGAL NOTICE:

This report is required by law (33U.S.C. 1318; 40 CFR 125.27). Failure to report or failure to report truthfully can result in penalties not to exceed \$10,000 per day of the violation; or in criminal penalties not to exceed \$25,000 per day of violation, or by imprisonment for not more than one year, or by both.

All information on these sheets must be as complete and accurate as possible and turned into Mike Williams or Dennis Lopasser. Following completion, Dennis Hale or Mike Williams will then report the incident to TDEC

Signature: [Signature]

3/6/24, 1:17 PM

MyTDEC Forms System - NPDES Sewer Overflow/Release/Bypass/Upset Event Report, Revision 1

NPDES Sewer Overflow/Release/Bypass/Upset Event Report

version 1.12

(Submission #: HQ1-Y10S-5V/RWN, version 1)

Details

Submitted 3/6/2024 (0 days ago) by John Chad Parton
Submission ID HQ1-Y10S-5V/RWN
Facility Name Sevierville (McCroskey Island) STP
Status Submitted
Active Steps Technical Review

Form Input

Permittee/Facility

Permit Number
TN0063959

Permittee Name
City of Sevierville

3/6/24, 1:17 PM

MyTDEC Forms System - NPDES Sewer Overflow/Release/Bypass/Upset Event Report, Revision 1

Facility Name
Sevierville (McCroskey Island) STP

Sewer Overflow Event (1 of 1)

Street: 917 Central Ave

Date Event Began
03/01/2024

Duration (Hours)
3.50

Location
35.8548778, -83.559448

State
TN

City
Sevierville

Street Address
917 Central Ave

Structure/Component ID
NONE PROVIDED

Structure/Component
Pipe/Line

Next Down Stream Pump Station
Davis Ln

3/6/24, 1:17 PM

FILED: WHITE OAK ST. & W. 100' W. OF SEVIERVILLE HOSPITAL ON WEST WAGON

Type of Event
Release [Sewer], Dry Weather

Est. Volume (Gallons)
10,500

Primary Cause of Event
Rags/wipes etc.

Primary Corrective Action Taken
Removed Blockage

Photos
NONE PROVIDED
Comment
Photos on file at Sewer Plant

Notes
Release did not reach waters or storm drain. Knocked out blockage, cleaned up area and disinfected with lime. This line has been put on our camera list to inspect condition of gravity main.

Status History

	User	Processing Status
3/6/2024 12:06:51 PM	John Chad Parton	Draft
3/6/2024 12:13:52 PM	John Chad Parton	Signing
3/6/2024 12:13:53 PM	John Chad Parton	Submitting
3/6/2024 12:14:31 PM	John Chad Parton	Submitted

Processing Steps

idoc.tn.gov/app/#/submission/version/45b031ea-0620-41d4-92e2-5cb9081c4293/overview

COMPLIANCE EVALUATION INSPECTION REPORT
City of Sevierville, Project No. CS-TN0063959-03072024

3/6/24, 1:17 PM

MY IUCU Forms System - NPUCS Sewer Overview/Release/ByPass/Upset Event Report, Revision 1

Step Name	Assigned To/Completed By	Date Completed
Form Submitted	John Chad Parton	3/6/2024 12:14:31 PM
Technical Review		
Submission Deemed Complete		

3/6/24, 1:17 PM

MyTDEC Forms System - NPDES Sewer Overflow/Release/ByPass/Upset Event Report, Revision 1

Agreements and Signature(s)

SUBMISSION AGREEMENTS

- ☒ I am the owner of the account used to perform the electronic submission and signature.
- ☒ I have the authority to submit the data on behalf of the facility I am representing.
- ☒ I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- ☒ I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

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 the 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.

Signed By John Chad Parton on 03/06/2024 at 12:13 PM

Enclosure 2 - Photographs



Photo 1. Manhole located at Stables Lift Station.



Photo 2. Stables Lift Station



Photo 3. Davis Lane Lift Station (One of the three main lift stations discharging to the wastewater plant)



Photo 4. Kodak Lane lift station

END REPORT