



REGION 4

ATLANTA, GA 30303

ELECTRONIC MAIL

CONFIRMATION OF RECEIPT EMAIL REQUESTED

The Honorable Harold Adcock
Mayor of the City of Greenbrier
2414 Highway 41 South
Greenbrier, Tennessee 37073
lannyadcock@greenbriertn.org

Re: Compliance Evaluation Inspection
Greenbrier Wastewater Collection and Transmission System
NPDES Permit No. TN0020621

Dear Mayor Adcock:

The U.S. Environmental Protection Agency, Region 4 conducted a Compliance Evaluation Inspection (CEI) on the City of Greenbrier's (the City) Wastewater Collection and Transmission System (WCTS) on October 22, 2024. The objective of the CEI was to assess the City's compliance with the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) permit, and to evaluate the general condition of the WCTS. The inspection results have been summarized in the enclosed CEI Report.

If you have specific questions about the inspection report, please contact Mr. Brad Ammons via email at ammons.brad@epa.gov or 404.562.9769. Please verify receipt of this letter and report by emailing Mr. Ammons at the email address provided.

Sincerely,

JAIRO

CASTILLO

Jairo Castillo, P.E., Chief

Wastewater Enforcement Section

Water Enforcement Branch

Digitally signed by JAIRO
CASTILLO
Date: 2024.12.20
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ENCLOSURE

1. Greenbrier, TN SSO CEI Report

cc: Jessica Murphy
Tennessee Department of Environment and Conservation
jessica.murphy@tn.gov

Jason Harrington
City of Greenbrier
jharrington@greenbriertn.org

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 Greenbrier STP

NPDES Permit Number: TN0020621

Project No. SS-TN0020621-10222024

Facility Address:

1223 Sugar Camp Drive,
Greenbrier, TN 37073

Inspection Date:

October 22, 2024

Inspectors:

Brad Ammons, EPA Region 4

Andrew Gunderson, EPA Region 4

Inspection Report Prepared by:

Brad Ammons

Title and Approval Sheet

Title: 20241213 Greenbrier TN Collection System SSO CEI Report
Project No. SS- TN0020621-10222024

Approving Official:

JAIRO
CASTILLO

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CASTILLO
Date: 2024.12.20
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Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Enforcement Officer:

MICHAEL AMMONS

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MICHAEL AMMONS
Date: 2024.12.20
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Brad Ammons, Inspector
Wastewater Enforcement Section
Water Enforcement Branch

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1. Overview

On October 22, 2024, the EPA conducted a Compliance Evaluation Inspection (CEI) of the City of Greenbrier'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 (TN0020621) 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 Greenbrier (City) Water and Sewer Department provides sanitary sewer services for residential, commercial, and industrial entities within the City of Greenbrier, Tennessee. The City owns and operates one wastewater treatment plant and 35 pump stations. The miles of gravity pipe owned by the city were not readily available.

2. Participants

Name	Organization	Contact Information
Brad Ammons	EPA Region 4	Ammons.brad@epa.gov
Andrew Gunderson	EPA Region 4	gunderson.andrew@epa.gov
Christina Wingett	TDEC	christina.wingett@tn.gov
Michael Murphy	TDEC	michaelp.murphy@tn.gov
Lance Sperl	City Operator	Greenbriersewer@att.net
Todd Giles	City Operator	tgiles@greenbriertn.org

3. 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, and a closing conference.

4. Investigation Methods

The investigation included:

- Review of the Integrated Compliance Information System (ICIS) database and the NPDES Permit;
- Interviews with the City's Water and Sewer Department personnel; and,
- SSO data provided by TDEC.

5. Regulatory Summary

The City's NPDES permit was effective on April 1, 2024, and expires on March 31, 2029. NPDES

permit requirements most applicable to the WCTS includes:

- i. Section 1.1.2 (Collection System Requirements) requires the City to report the total number of Sanitary Sewer Overflows (SSOs), both wet weather and dry weather, with the monthly Discharge Monitoring Report (DMR).
- ii. Section 1.3.5 (Sanitary Sewer Overflow, Release, and Bypass Reporting) requires the City to report SSOs, Releases or Bypasses within set timeframes.
- iii. Section 2.1.3 (Proper Operation and Maintenance) 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).
- iv. Section 2.3.2 (Sanitary Sewer Overflows and Releases) prohibits SSOs (both wet weather and dry weather), requires the City to minimize any adverse impact of SSOs, and sets up a moratorium on new connections for locations that experience more than 5 SSOs/Releases in a year.

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.

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 1.3.5 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 2.1.3 of the NPDES permit.

6. Inspection Summary and Findings

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 - TDEC requires all wet weather and dry weather SSOs to be reported with the monthly DMR. EPA analyzed the reported SSOs and moratoriums provided by TDEC through the EPA's ICIS database. The EPA found that the City experienced numerous dry weather and wet weather SSOs and has numerous locations under moratorium.

- b. The City owns and operates 35 pump stations, none of which are monitored using Supervisory Control and Data Acquisition (SCADA), but the City reads the elapsed time meters 7 days per week. According to staff, the City currently has no chronic SSO locations subject to moratorium, but subsequent SSO data from TDEC reveals the Forest Oaks Pump Station 1 meets the chronic SSO criteria in the NPDES permit. Some of the WCTS consists of clay pipe that is about 40 years old. The City owns one combination vacuum/jetter which is operable. Any CCTV work is contracted out. The City serves approximately 6,900 people.
- c. Management, Operations and Maintenance Program.

The operators keep a log of when each pump station is checked (daily elapsed time meters recording). The EPA requested a summary of the most recent and planned Infiltration/Inflow (I/I) projects via email, which they provided on 10/25/2024. In addition, the EPA requested the City's written standard operating procedures for safety, training, and fats, oils, and grease control. As of the date of this report, the City has not provided this information.

7. Recommendations and Conclusion

The City should continue to implement a program for sewer assessment and rehabilitation to remove I/I. For other MOM Programs, 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>.

END OF REPORT