

July 18, 2007

Mr. Steve Flynn, General Manager
116 Church Street
Sevierville, Tennessee 37862

**RE: Notice of Violation/Request for Corrective Action Plan (CAP)
Sevierville Sewage Treatment Plant (STP)
NPDES Permit Number TN0063959
Sevier County**

Dear Mr. Flynn:

The Division of Water Pollution Control in the Knoxville Environmental Field Office (KEFO) through Sevierville's self monitoring requirements have noted five overflow events at the Indian Warpath lift station and five overflow events along the Boyd's Creek force main over the last twelve months.

In Part II. Section C: 3.c. the permit requires that no new or additional flows shall be added upstream of any point in the collection system which experiences chronic overflows (greater than five events per year) or would otherwise overload any portion of the system.

During a meeting on July 10th it was brought to the attention of the KEFO that City of Sevierville has not interpreted the permit language in Part II. Section C: 3.c. to incorporate overflows in common vicinity to be identified as a point in the collection system. The division requests that the City Sevierville amend their procedure for identifying recurring overflow points to include the understanding that a point is defined as a common vicinity or transport area. Also in our meeting on July 10th Sevierville informed the division that funding of a lift station replacement at Indian Warpath and a new lift station being added to the Boyd's Creek force main as already been approved. Consultant Rick Kirby of JJ&G indicated that the plans for the lift stations are being developed and should be completed within two or three weeks. In addition to the self-imposed moratorium requirements in the NPDES permit described above, the permit is violated when any overflow event occurs.

Therefore it is requested that within **30** days of receiving this notification, the City of Sevierville must submit a Corrective Action Plan (CAP) identifying actions and a

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proposed schedule with dates to remediate any future overflows occurring in this section of the collection system. Sevierville must also submit a list and information of any planned sewer connections upstream of the Indian Warpath lift station.

It is also requested, that Sevierville submit a Sewer overflow response plan (SORP) to TDEC-KEFO for review and comment no later than **September 30, 2007**. The SORP shall include procedures for minimizing health impacts and shall include measures to be taken when overflows discharge on local streets or other public areas. The SORP shall also include appropriate measures for the notification of affected property owners and stream users, and shall include notification of the news media when necessary to protect public health. The SORP shall state specific procedures for notifying known downstream users in the event that untreated wastewater is discharged to waters of the state by sanitary sewer overflow (SSO). These procedures shall include, but not be limited to, provisions for posting warning signs at places where the general public could gain access to polluted waters. Further, posted signs shall remain in place until in-stream monitoring reveals that the water body has returned to normal background conditions.

Sevierville is also advised per this letter that the development of a capacity management program could be beneficial in the future and could aid in preventing future overflows and reducing infiltration and inflow in the collection system. Developed written MOM programs are identified in the EPA Region 4 Guide to Collection and Transmission System Management, Operation, and Maintenance Programs.

If you have any questions concerning this letter or if we may be of any further assistance to you in any way, please feel free to contact me by phone at (865) 594-5589 or by email at Michael.atchley@state.tn.us.

Sincerely,

Michael Atchley

Division of Water Pollution Control

cc: Enforcement & Compliance Section, Nashville, WPC
EPA Region IV, Clean Water Enforcement Section, Atlanta, GA
Dennis Hale, Operator, Sevierville STP
Files (Sevierville STP, Sevier County, NPDES # TN0063959)

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