



**Development Resource Center  
1250 Market Street, Suite 3050  
Chattanooga, TN 37402  
Tel: 423-209-7842  
Fax: 423-209-7843**

**Michael C. Patrick  
Executive Director**

February 10, 2025

EES Case Management Unit  
Environment and Natural Resources Division  
U.S. Department of Justice  
Box 7611  
Washington, D.C. 20044-7611

Re: DJ # 90-5-1-1-11394 – Semi-Annual Work Progress Report No. 1

EES Case Management Unit:

The Hamilton County WWTA has completed Semi-Annual Work Progress Report No. 1 in accordance with the Consent Decree entered into by the United States District Court for the Eastern District of Tennessee (Southern Division), for the reporting period July 16, 2024, through January 15, 2025.

Pursuant to Paragraph 34 of the Consent Decree, the *Semi-Annual Work Progress Report* includes the following:

- A description of projects and activities completed and milestones achieved during the previous applicable six (6)-Month period pursuant to the requirements of this Consent Decree including a description of the status of compliance or non-compliance with the requirements of this Consent Decree and, if applicable, the reasons for non-compliance.
- A summary of significant projects and activities anticipated to be performed and milestones anticipated to be achieved in the successive applicable six (6)-Month period to comply with the requirements of this Consent Decree.

The deliverable has been submitted to the Public Document Repository (PDR) located on the WWTA's website here: <https://wwta.hamiltontn.gov/178/Public-Document-Repository>. A physical hard copy has been submitted to the Public Document Repository at the Chattanooga-Hamilton County Library as of **February 10, 2025**.

*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 have no personal knowledge that the information submitted is other than 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.*

Sincerely,

Michael Patrick, P.E.  
Executive Director

Cc:

Chief, Clean Water Enforcement Branch  
Water Protection Division  
US EPA Region 4  
61 Forsyth St., SW  
Atlanta, GA 30303

Wilson Buntin  
Senior Assistant Attorney General  
Office of the Attorney General  
Environmental Division  
P. O. Box 20207  
Nashville, TN 37202

Manager of Enforcement and Compliance Section, Division of Water Resources  
Tennessee Department of Environment and Conservation  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, TN 37232-1101

Patrick Parker  
Assistant General Counsel  
Office of General Counsel  
Tennessee Department of Environment and Conservation  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 2nd Floor  
Nashville, TN 37232-1101

# **Semi-Annual Work Progress Report No. 1**

## **July 16, 2024 – January 15, 2025**

Prepared for  
**The United States Environmental Protection Agency and  
Tennessee Department of Environment and Conservation**

**Case No. 1:23-cv-00225**

Prepared by  
**Hamilton County  
Water & Wastewater  
Treatment Authority (WWTA)**

Submitted by  
LJA Engineering, Inc.  
1110 Market Street, Suite 314  
Chattanooga, TN 37402  
2/10/2025



## Table of Contents

Table of Contents .....	i
Acronyms and Abbreviations .....	iii
1 Executive Summary .....	1
2 Introduction.....	3
2.1 Purpose .....	3
2.2 Requirements .....	3
2.3 Report Structure .....	3
3 Work Progress .....	4
3.1 Sanitary Sewer Evaluation/Rehabilitation (“SSER”) Work Plan.....	4
3.1.1 Pump Station Assessments .....	4
3.2 Capacity Management Operations and Maintenance (CMOM) Programs .....	4
3.2.1 Sewer Overflow Response Plan (SORP).....	4
3.2.2 Incident Response Plan (IRP).....	4
3.2.3 Information Management System (IMS).....	5
3.2.4 Sewer System Hydraulic Model.....	5
3.2.5 Sewer Mapping Program.....	5
3.2.6 Gravity Sewer System Operations and Maintenance Program .....	5
3.2.7 Corrosion Control Program .....	6
3.2.8 Pump Station Operations and Preventative Maintenance Program .....	6
3.2.9 Fats, Oils and Grease (FOG) Control Program .....	7
3.2.10 Capacity Assurance Program (CAP) .....	7
3.2.11 Financing and Cost Analysis Program.....	7
3.2.12 Legal Support Program.....	7
3.3 Early Action Projects .....	8
3.3.1 Soddy Daisy Equalization Station .....	8
3.3.2 East Ridge Sub-basins 3C and 4B Rehabilitation .....	8
3.3.3 Lookout Mountain Sub-basins 2, 5, 6 and 9 Rehabilitation .....	9
3.3.4 Red Bank Sub-basin 5, 6, and 7 Rehabilitation.....	9
3.3.5 East Ridge Basin 10 Rehabilitation .....	9
3.3.6 East Ridge I-75 Collector Sewer Replacement .....	10
3.3.7 Roy Lane, Snow Hill, Green Gap PS Upgrades.....	10

3.3.8	Lee Hwy Pump Station and Force Main .....	10
3.3.9	Short Tail Springs Pump Station and Force Main .....	10
3.4	Sewer Basin Groups 1-5 .....	11
3.4.1	Group 1 Sewer Basins .....	11
3.5	Service Area Performance Standards, Plans, and Reports .....	12
3.5.1	Service Area Performance Standards.....	12
3.6	Signal Mountain WWTP Bypass .....	12
3.6.1	Remediation Plan .....	12
3.6.2	Completion of Construction Remediation Plan.....	12
4	Additional Work.....	13
4.1	e2i2 SSO Abatement Program (West Chickamauga).....	13
4.2	Lee Hwy PS Force Main Extension .....	13
4.3	PSLP Program .....	13
5	Anticipated Work.....	14
5.1	Quarterly Report No. 3.....	14
5.2	Quarterly Report No. 4.....	14
5.3	Semi-Annual Work Progress Report No. 2 .....	14
5.4	Annual Work Progress Report No. 1 .....	14
5.5	Sanitary Sewer Evaluation/Rehabilitation (SSER) Work Plan .....	14
5.6	Incident Response Plan .....	14
APPENDIX A.....		15
APPENDIX B.....		16

## Acronyms and Abbreviations

CCTV	Closed-Circuit Television
CFR	Code of Federal Regulations
CMMS	Computerized Maintenance and Management System
CMOM	Capacity, Management, Operations, and Maintenance
DMR	Discharge Monitoring Report
EPA	United States Environmental Protection Agency
GIS	Geographic Information System
GPM	Gallons Per Minute
HAZMAT	Hazardous Material
I&I	Infiltration and Inflow
ISS	Interceptor Sewer System
MGD	Million Gallons Per Day
MOM	Management, Operations, and Maintenance
MOR	Monthly Operating Report
NPDES	National Pollution Discharge Elimination System
O&M	Operation and Maintenance
SCADA	Supervisory Control and Data Acquisition System
SOP	Standard Operating Procedures
SORP	Sewer Overflow Response Protocol
SSO	Sanitary Sewer Overflow
SSS	Sanitary Sewer System
TDEC	Tennessee Department of Environment and Conservation
TWRA	Tennessee Wildlife Resources Agency
WWTA	Water and Wastewater Treatment Authority
WWTP	Wastewater Treatment Plant

# 1 Executive Summary

The Hamilton County Water and Wastewater Treatment Authority (WWTA) 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. Hamilton County Water and Wastewater Treatment Authority, No. 1:23cv-00225* ("CD"), which became effective on July 16, 2024. Pursuant to Section IX, paragraph 34 of the CD, WWTA is required to submit reports on a semi-annual basis to the Environmental Protection Agency ("EPA") and Tennessee Department of Environment and Conservation ("TDEC"). WWTA has prepared Semi-Annual Report No. 1 to satisfy the reporting requirements of the CD. This report is also being submitted in accordance with the letter from WWTA Executive Director, Michael Patrick; dated November 8, 2024 establishing the dates for reporting under the CD.

As detailed in Section IX, paragraph 34 of the CD, WWTA is required to report the projects and milestones achieved during the previous 6-Month period.

During the Report Period, the WWTA developed and submitted the deliverables that are listed in Table 1-1 to the Environmental Protection Agency ("EPA") and the Tennessee Department of Environment and Conservation ("TDEC") for review and approval. This information is also available in Appendix A.

**Table 1-1**

Completed Projects and Submitted Consent Decree Deliverables for the Current Reporting Period

CD Projects and Deliverables	CD Reference	CD Deadline	Submittal Date/ Completion Date
Public Document Repository	Section VI., para 11	9/16/2024	7/16/2024
Quarterly Report No. 1	Section IX., para 33	11/16/2024	11/8/2024
Quarterly Report No. 2	Section IX., para 33	2/16/2025	2/10/2025
Semi-Annual Work Progress Report No. 1	Section IX., para 34	2/16/2025	2/10/2025
Signal Mountain Remediation Plan	Section VI., para 28	9/16/2024	9/6/2024
Sewer Overflow Response Plan (SORP)	Appendix E, para a.	2/16/2025	1/14/2025
PSLP Amendment	Appendix E, para I.3	1/16/2025	10/25/2024

Table 1-2 lists the projects and deliverables that WWTA expects to complete for the upcoming semi-annual period of January 16, 2025 through July 15, 2025. This information is also available in the Progress Tracking document in Appendix A. The deadlines listed in Table 1-2 are based on the suggested reporting periods that the WWTA requests from the EPA as referenced in the letter dated 11/8/2024 and available in Appendix B.

**Table 1-2**

Anticipated Completed Projects and Consent Decree Deliverables for the Next Reporting Period

CD Projects and Deliverables	CD Reference	CD Deadline	Anticipated Submittal/ Completion Date
Quarterly Report No. 3	Section IX., para 33	5/16/2025	5/16/2025
Quarterly Report No. 4	Section IX., para 33	7/30/2025	7/30/2025
Semi-Annual Work Progress Report No. 2	Section IX., para 34	7/30/2025	7/30/2025
Annual Work Progress Report No.1	Section IX., para 34	7/30/2025	7/30/2025
Sanitary Sewer Evaluation/Rehabilitation Work Plan (SSER)	Section IX., para 22	8/16/2025	8/16/2025
Incident Response Plan (IRP)	Appendix E, para b.	8/16/2025	8/16/2025



## **2 Introduction**

---

### **2.1 Purpose**

Pursuant to Section IX, Paragraph 34, of the CD, WWTa is required to submit work progress reports on a semi-annual basis to the EPA and TDEC. WWTa has prepared this Report to satisfy this reporting requirement.

### **2.2 Requirements**

As detailed in Section IX of the CD, WWTa is required to report the following information concerning compliance with the remedial actions set forth under the CD:

1. A description of projects and activities completed, and milestones achieved during the previous 6-month period pursuant to the requirements of the CD, in Gantt chart or similar format, including a description of compliance or non-compliance with the requirements of the CD and, if applicable, the reasons for non-compliance.
2. A summary of significant projects and activities anticipated to be performed, and milestones anticipated to be achieved, in the successive 6-month period to comply with the requirements of the CD, in Gantt chart or similar format.
3. Any additional information the WWTa determines is appropriate to demonstrate that WWTa is implementing the remedial actions required under the CD in an adequate and timely manner.

### **2.3 Report Structure**

Work progress is presented in the body of the Report in a narrative format. This narrative includes a brief description of each CD project, as well as any activities completed or milestones that were achieved or are anticipated to be completed. In addition to these descriptions, a progress tracking document is available in Appendix A.

## 3 Work Progress

---

### 3.1 Sanitary Sewer Evaluation/Rehabilitation (“SSER”) Work Plan

**Description:** The Sanitary Sewer Evaluation/Rehabilitation (SSER) Work Plan provides for the continual assessment, analysis, and rehabilitation of the entire waste collection and transmission system (WCTS) infrastructure, including Groups 1-5 and the Residual Sewer basin Group to eliminate, store, capture for treatment I/I, and eliminate structural defects and the other conditions causing, or that are likely to cause, SSOs and/or Prohibited Bypasses as outlined in Paragraph 22 of the Consent Decree.

**Status:** A draft SSER Work Plan was developed in Summer 2024 and currently under review by the WWTa. The WWTa plans to submit the SSER Work Plan prior to the CD Deadline.

#### 3.1.1 Pump Station Assessments

**Description:** The SSER Work Plan involves a continued effort to assess and analyze the 59 pump stations in the WCTS. The WWTa will develop a plan for future rehabilitation projects resulting from the PS assessments.

**Status:** The WWTa is currently assessing all 59 pump stations in accordance with the CD requirements for the SSER Work Plan.

### 3.2 Capacity Management Operations and Maintenance (CMOM) Programs

#### 3.2.1 Sewer Overflow Response Plan (SORP)

**Description:** The Sewer Overflow Response Plan (SORP) establishes timely and effective methods and means of responding to, cleaning up, and/or minimizing the impact of SSOs and Prohibited Bypasses; timely reporting of the location, volume, cause, impact, and other pertinent SSO and Prohibited Bypass information to the appropriate regulatory agencies; and timely and effective notification of SSOs and Prohibited Bypasses to potentially impacted public as outlined in Appendix E of the Consent Decree.

**Status:** A draft has been completed and submitted to TDEC/EPA on January 14, 2025.

#### 3.2.2 Incident Response Plan (IRP)

**Description:** The Incident Response Plan (IRP) will address both routine incidents and catastrophic incidents. Routine incidents include such situations as overflowing manholes, line breaks, localized electrical failure, and pump station outages. Catastrophic incidents include floods, tornadoes, earthquakes, or other natural events; serious chemical spills; and widespread electrical failure. The Plan will address areas of vulnerability and determine the effect of an incident-related failure to operations, equipment, and public safety and health based upon such factors as topography, weather, Sewer System size, and other site-specific factors.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the IMS Program.

### **3.2.3 Information Management System (IMS)**

**Description:** The Information Management System (IMS) will provide the WWTa with guidance and instruction to adequately evaluate operations, maintenance, customer service (including complaint tracking), and Sewer System rehabilitation activities so that overall Sewer System performance can be determined and utility planning can be conducted. The maintenance IMS component will provide the WWTa with guidance to adequately track scheduled maintenance activities and to enhance maintenance performance.

**Status:** The WWTa has implemented a new Work Order System with digital forms to better track work history and enhance maintenance performance. The WWTa is currently developing standard operating procedures and systems to incorporate into the IMS Program.

### **3.2.4 Sewer System Hydraulic Model**

**Description:** The WWTa will develop and maintain a calibrated Hydraulic Model of its Sewer System to establish existing hydraulic conditions and plan for future capacity needs of the Sewer System. The Hydraulic Model will be developed on a Sewer basin concurrent with the assessment of Groups 1 through 5 in accordance with Paragraph 23 of the Consent Decree.

**Status:** The WWTa has developed and calibrated the Hydraulic Model for the sewer basins included in Early Action Rehabilitation Projects. The Hydraulic Model for the remaining sewer basins will be completed concurrent with the assessments of the remaining Groups as required in the Consent Decree.

### **3.2.5 Sewer Mapping Program**

**Description:** The Sewer Mapping Program updates the capabilities and procedures for utilization of a Geographic Information System (GIS) map of the wastewater system. The Sewer Mapping Program will enable the WWTa to produce maps of the WCTS using GIS Technology and to allow electronic integration with WWTa's computer-based collection system model and computer-based operations and maintenance information management system.

**Status:** The WWTa maintains a very robust GIS and currently developing standard operating procedures and system for updates to the Sewer Mapping Program. The WWTa plans to submit the Sewer Mapping Program pursuant to the CD Deadline, 36 months after the effective date.

### **3.2.6 Gravity Sewer System Operations and Maintenance Program**

**Description:** The Gravity Sewer System Operations and Maintenance Program will include written preventative operations and maintenance schedules and procedures to eliminate SSOs and Prohibited Bypasses, particularly those caused by FOG, roots, and/or debris obstructions.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the Gravity Sewer System Operations and Maintenance Program.

#### **3.2.6.1 Smoke Testing and Lateral Cleanout Replacements**

**Description:** The WWTa conducts smoke testing on a portion of its WCTS on an annual basis to determine locations that I/I could be entering the WCTS. The WWTa has implemented a program to replace any broken lateral cleanouts identified as deficient during the smoke testing.

**Status:** The WWTa completed 9,008 LF of smoke testing during the reporting period of July 16, 2024 – January 15, 2025 and replaced 146 broken cleanouts.

### **3.2.7 Corrosion Control Program**

**Description:** The Corrosion Control Program will include provisions for inspecting the sewerage infrastructure for corrosion caused by hydrogen sulfide and other corrosives and develop a plan for implementing site-specific corrosion control measures.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the Corrosion Control Program.

### **3.2.8 Pump Station Operations and Preventative Maintenance Program**

**Description:** The Pump Station Operations and Preventative Maintenance Program will develop standards and procedures to improve the operations and maintenance activities within the WCTS and reduce SSOs. The Pump Station Operations and Preventative Maintenance Program will include an inventory management system that includes a list of critical equipment and critical spare parts.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the Pump Station Operations and Preventative Maintenance Program. In the meantime, the WWTa has implemented multiple projects to improve the performance and operations of its pump stations.

#### ***3.2.8.1 Pump Station Control Upgrades***

**Description:** Multiple pump stations had aging control panels in need of upgrades. The WWTa is upgrading the instrumentation and controls at the following four (4) pump stations: Posey Hollow PS, Rogers Branch PS, Bluebird PS, and Soddy Industrial PS.

**Status:** The control upgrades at Posey Hollow PS are complete. The control upgrades at Roger Branch PS, Bluebird PS, and Soddy Industrial PS are currently in the design phase.

#### ***3.2.8.2 Pump Station Safety Upgrades (46 pump stations)***

**Description:** The WWTa is installing safety rails and grates at 46 of its pump stations to improve the safety at each station and prevent falls and accidents during pump station maintenance and operation.

**Status:** The project is currently under design.

#### ***3.2.8.3 Backup Electrical Upgrades at Soddy Daisy Industrial PS***

**Description:** The Soddy Daisy Industrial PS is a critical pump station for the operations of the WCTS, and the WWTa decided to improve reliability of the pump station with the installation of a backup electrical system. The new generator will provide an energy source at Soddy Daisy Industrial PS in the occurrence of any power outages.

**Status:** The WWTa has executed the purchase order for the purchase of the new generator with plans to install the generator in Spring 2025.

#### ***3.2.8.4 West Brow Oval Pump Station Rehabilitation***

**Description:** The West Brow Oval Pump Station is located in Lookout Mountain, TN. This project includes the replacement of the existing pumps and modifying the existing dry well with new submersible grinder pumps and new 5-foot diameter precast concrete wet well inside the existing drywell. The project also includes the installation of a new access road to the station and new electrical and controls systems.

**Status:** The project is currently under construction.

#### ***3.2.8.5 Rhinehart Valley PS Force Main Upgrades***

**Description:** The Rhinehart Valley PS is a pump station that conveys flow from the southeastern portion of Hamilton County, TN. This project includes the design and construction of 9,900 LF of a new force main to increase the size from an existing 6-inch diameter to 10-inch diameter. The project also includes upgrades to the pumps, electrical, and instrumentation/controls at the Rhinehart Valley Pump Station.

**Status:** The project is currently under construction.

#### **3.2.9 Fats, Oils and Grease (FOG) Control Program**

**Description:** The Fats, Oils, and Grease (FOG) Control Program will include a characterization study that shall identify the sources of FOG causing problems in the WCTS and describe procedures of the most appropriate method or mechanism for addressing these sources.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the FOG Control Program.

#### **3.2.10 Capacity Assurance Program (CAP)**

**Description:** The Capacity Assurance Program (CAP) will be developed pursuant to Paragraphs 21 and 22 of the Consent Decree. The CAP will identify each Sewerbasin with insufficient capacity under peak wet weather conditions or average conditions. It will also analyze all portions of the WCTS that hydraulically impact all known SSOs and/or Prohibited Bypasses and all components of a WWTP that may contribute to violations of the NPDES Permit. The CAP will also assess peak flow capacity of all Pump Stations, all Major Sewer Gravity Lines, all Force Mains and siphons, and their respective related appurtenances.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the Capacity Assurance Program.

#### **3.2.11 Financing and Cost Analysis Program**

**Description:** The Financing and Cost Analysis Program will include a process that regularly analyzes, projects, plans, and finances management, operating, and maintenance costs of its Sewer System, including costs associated with labor and equipment needed to properly implement the CMOM programs required pursuant to the Consent Decree.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the Financing and Cost Analysis Program.

#### **3.2.12 Legal Support Program**

**Description:** The Legal Support Program will include the following: Rules and Regulations Program, FOG Control Legal Support Program, and Private Lateral Legal Support Program.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the Legal Support Program.

#### ***3.2.12.1 Rules and Regulation Program***

**Description:** The Rules and Regulations Program will establish a legal process that allows the WWTa to enforce rules and regulations to take actions necessary to implement the Consent Decree.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the Rules and Regulation Program.

#### ***3.2.12.2 FOG Control Legal Support Program***

**Description:** The FOG Control Legal Support Program will include an enforcement response guide to address violations of the FOG Control Program. The guide, in conjunction with the rules and regulations, will include an array of tools available to WWTa in the enforcement of the FOG Control Program and applicable rules and regulations.

**Status:** The WWTa is currently developing standard operating procedures and systems to incorporate into the FOG Control Legal Support Program.

#### ***3.2.12.3 Private Lateral Legal Support Program***

**Description:** The WWTa will continue to implement its current Private Sewer Lateral (PSLP) Program for all WWTa customers, which provides for WWTa-financed repair of private sewer laterals when the customer notifies WWTa of laterals that need to be repaired or when WWTa discovers laterals that require repair. The PSLP Support Program includes an Amendment to the PSLP Program to add a series of graduated enforcement responses, including termination of services that will be employed, when necessary.

**Status:** The WWTa Board passed a Resolution to amend the PSLP Program on 9/25/2024 pursuant to the Consent Decree requirements. The Amendment to the PSLP Program was uploaded to the PDR on 10/25/2024.

### **3.3 Early Action Projects**

#### **3.3.1 Soddy Daisy Equalization Station**

**Description:** The Soddy Daisy Equalization Station project involves the construction of 3 million gallons of wet-weather storage immediately adjacent to the Soddy Industrial Pump Station. The purpose of the project is to eliminate a chronic SSO upstream of the pump station and to attenuate wet-weather flow into the City of Chattanooga wastewater system.

**Status:** The new equalization station is fully operational.

#### **3.3.2 East Ridge Sub-basins 3C and 4B Rehabilitation**

**Description:** The East Ridge Sub-basins 3C and 4B Rehabilitation project involved manhole inspections, smoke testing and closed-circuit television inspection (CCTV) of approximately 75,618 linear feet of gravity sewers and 354 manholes located within Basin 3C and 4B basins in the East Ridge Service Area. Approximately 36,291 linear feet of trenchless pipeline repairs ranging from 6-inch to 10-inch diameter; and 1,001 linear feet of pipe bursting of 6-inch gravity main to 8-inch gravity main. Approximately 862 service laterals repairs utilized trenchless or open cut methods. Additionally, approximately 1,433 vertical

feet of manhole repairs were required utilizing an epoxy or polymer-based lining system, as well as surface manhole repairs.

**Status:** The rehabilitation is complete and fully operational.

### **3.3.3 Lookout Mountain Sub-basins 2, 5, 6 and 9 Rehabilitation**

**Description:** The Lookout Mountain Sub-basins 2, 5, 6 and 9 Rehabilitation project involved manhole inspections, smoke testing and closed-circuit television inspection (CCTV) of approximately 62,628 linear feet of gravity sewers and 445 manholes located within Basins 2, 5, 6, and 9 in the Lookout Mountain Service Area. The rehabilitation project included approximately 24,210 linear feet of 8-inch trenchless pipeline repairs and 1,150 linear feet of open cut gravity sewer replacement of 8-inch diameter gravity sewer. Approximately 159 service lateral repairs utilizing trenchless or open cut methods were required. The project included approximately 2,100 vertical feet of manhole repairs may be required utilizing an epoxy or polymer-based lining system, as well as surface manhole repairs. The project was performed in two phases. Phase 1 consisted of rehabilitation projects to reduce infiltration and inflow. Phase 2 included the replacement of sections of the downstream sewers to improve hydraulic carrying capacity to eliminate the chronic sanitary sewer overflows occurring near sub-basin LM06.

**Status:** The rehabilitation is complete and fully operational.

### **3.3.4 Red Bank Sub-basin 5, 6, and 7 Rehabilitation**

**Description:** Rehabilitation of Red Bank Sub-basins 5,6,7 was executed as one project and involved identifying and correcting high-priority defects contributing to inflow and infiltration. Approximately 87,910 linear feet (LF) of sewer gravity main, 381 manholes, and 1,201 service laterals were analyzed with SSES for rehabilitation. The Rehabilitation project included the rehabilitation of approximately 9,500 linear feet of 12, 8, and 6-inch gravity sewer with Cured-In-Place-Pipe (CIPP), 1,880 vertical feet of 48-inch diameter manhole lining, and rehabilitation of 400 laterals with CIPP. The project also included 50 open cut lateral replacements, 1,100 linear feet of 8-inch open cut gravity sewer pipe replacement, 260 linear feet of 15-inch gravity sewer realignment with a stream crossing, 225 linear feet of new 8-inch gravity sewer installation, 165 manhole frame and cover replacements, 11 new manholes, and 320 linear feet of 8-inch pipe bursting.

**Status:** The rehabilitation is complete and fully operational.

### **3.3.5 East Ridge Basin 10 Rehabilitation**

**Description:** The East Ridge Basin 10 Rehabilitation project involved manhole inspections, smoke testing and closed-circuit television inspection (CCTV) of approximately 67,528 linear feet of gravity sewers and 279 manholes located within Basin 10 in the East Ridge Service Area. The rehabilitation project included approximately 33,153 linear feet of trenchless pipeline repairs ranging from 6-inch to 18-inch diameters and 670 linear feet of open cut gravity sewer replacement ranging from existing 6-inch to 8-inch diameters. Approximately 687 service lateral repairs utilizing trenchless or open cut methods were required. Approximately 2,064 vertical feet of manhole repairs were made utilizing epoxy and polymer-based lining systems. The project also included manhole repairs and included sanitary sewer evaluation studies (SSES) of sub-basins ER1A, ER3A, ER3B, ER4B, ER5 and ER8A. The SSES investigations involved manhole inspections, smoke testing and closed-circuit television (CCTV) inspections of all assets within the basin. Phase 2 of this project included manhole repairs and the removal of sources of infiltration and inflow around the East Ridge Lift Station (former East Ridge Wastewater Treatment Plant).

**Status:** The rehabilitation is complete and fully operational.

### **3.3.6 East Ridge I-75 Collector Sewer Replacement**

**Description:** The East Ridge I-75 Collector Sewer Replacement project involved the replacement of three severely deteriorated collector sewers under I-75 north and south of Exit #1. These three crossings, two that carried sanitary sewers from the western portion of East Ridge Basin 10 and one that brought the combined flows from East to West back under I-75, were replaced with a new collector sewer with only one crossing of I-75. This project dramatically improved hydraulic carrying capacity and removed sources of infiltration and inflow and eliminated two chronic sanitary sewer overflows at manhole ID 24 and at manhole ID 61E. The project involved installation of 2,600 linear feet of open cut 16-inch ductile iron gravity sewer, 650 linear feet of 16-inch ductile iron gravity sewer associated with jack and bore installation with 600-linear feet of 30-inch steel casing pipe, 1,800 linear feet of open cut 12-inch ductile iron and PVC gravity sewer, 200 linear feet of open cut 8-inch PVC gravity sewer, and the installation of associated precast sewer manholes with watertight frame and covers.

**Status:** The rehabilitation is complete and fully operational.

### **3.3.7 Roy Lane, Snow Hill, Green Gap PS Upgrades**

**Description:** The Roy Lane, Snow Hill, and Green Gap PS Upgrades project involved upgrading several pump stations and force mains to eliminate sanitary sewer overflows and extend the useful life of these stations. The Roy Lane Pump Station upgrade project involved installing larger pumps in the station and diverting flow to the new Mountain View Force Main. The flow from the Snow Hill Road Pump Station was then reversed so that flow was pumped to the Roy Lane Pump Station from Snow Hill Road pump station instead of that station pumping to the Rogers Branch Pump Station. The project required some modifications to the Green Gap force main to allow the connection of the Roy Lane Force Main. This project was done in tandem with the Mountain View Force Main project to alleviate capacity issues at the Snow Hill Road Pump Station and the Rogers Branch Pump Station and to allow flow to be pumped directly to the Amos Road Pump Station.

**Status:** The work is complete and fully operational.

### **3.3.8 Lee Hwy Pump Station and Force Main**

**Description:** The Lee Hwy Pump Station and Force Main project involved replacing the existing 16-inch force main that discharged to the Collegedale Pump Station with a new force main approximately 10,500 feet in length that was connected directly to the City of Chattanooga's Interceptor Sewer System near the intersection of Apison Pike and Old Lee Highway. The new force main was intended to alleviate capacity issues at the Collegedale Pump Station. In addition to this new force main, the pumps at the Lee Hwy Pump Station were replaced to handle a design condition of 3,500 gallons per minute with a total dynamic head of 225 feet.

**Status:** The work is complete and fully operational.

### **3.3.9 Short Tail Springs Pump Station and Force Main**

**Description:** The Short Tail Springs Pump Station and Force Main Rehabilitation project included upgrades to upsize approximately 7,800 linear feet of force main and provide backup up emergency pumping capacity to this station. Phase 1 of this project consisted of the replacement of a portion of the



force main and was completed in September 2021. Phase 2 of this project consisted of upgrading the pumping capacity and installing new controls and a backup diesel pump to run during electrical outages.

**Status:** The work is complete and fully operational.

### **3.4 Sewer Basin Groups 1-5**

#### **3.4.1 Group 1 Sewer Basins**

##### **3.4.1.1 Assessment**

###### **3.4.1.1.1 Signal Mountain Basin 2ABCD and 6ABC**

**Description:** The project involved CCTV inspection and smoke testing of the existing sewer infrastructure; 64,018 LF of gravity sewer main and 388 manholes.

**Status:** This assessment is complete.

###### **3.4.1.1.2 Soddy Daisy Basins 2, 3, and 4A**

**Description:** The project included 59,262 LF of gravity sewer main assessed by CCTV, and 45 manholes were inspected.

**Status:** This assessment is complete.

###### **3.4.1.1.3 Hamilton County 6A and 6B**

**Description:** This project included 75,376 LF of gravity sewer main was assessed by CCTV, and 301 manholes were inspected.

**Status:** This assessment is complete.

##### **3.4.1.2 Design and Construction**

###### **3.4.1.2.1 Signal Mountain Basin 2ABCD and 6ABC**

**Description:** This project includes the rehabilitation of the Signal Mountain Basin 2ABCD and 6ABC sewer basins. The project scope consists of trenchless cured-in-place pipe rehabilitation for gravity sewer with diameters between 6-inch and 15-inch with an approximate total linear footage of 33,300. Approximately 209 service laterals will also be rehabilitated using trenchless pipe methods. Approximately 110 manholes will be rehabilitated using either polyurethane/polyurea coating methods with new frame and covers. Additionally, 11 repairs are expected that require trenching activities.

**Status:** This project is currently under construction.

###### **3.4.1.2.2 Soddy Daisy Basins 2, 3, and 4A**

**Description:** The Soddy Daisy Basins 2, 3, and 4A project involved SSES activities, rehabilitation of the existing sewer infrastructure, and smoke testing to identify areas requiring repairs. From the SSES, 4,295 LF of sewer, 59 laterals, and 38 manholes were rehabilitated.

**Status:** This project is currently under construction.

#### **3.4.1.2.3 Hamilton County 6A and 6B**

**Description:** The rehabilitation project in sewer basins Hamilton County 6A and 6B (Middle Valley Sewer Rehabilitation) involved SSES activities, rehabilitation of the existing sewer infrastructure, and smoke testing to identify areas requiring repairs. The scope of construction included the rehabilitation of 8,641 LF of gravity sewer rehabilitation and 98 manholes.

**Status:** This project is complete.

### **3.5 Service Area Performance Standards, Plans, and Reports**

#### **3.5.1 Service Area Performance Standards**

##### **3.5.1.1 Ooltewah**

The WWTa has complied with 25.a(3) of the Consent Decree and will convey no more than 6.2 MGD of peak flow based on a 3-inch 24-hour storm event to Chattanooga's WCTS as measured at Chattanooga Manhole S140A012.

##### **3.5.1.2 Soddy Daisy**

The WWTa has complied with 25.a(6) of the Consent Decree and will convey less than 5.0 million gallons per day (MGD) of peak flow on a 3-inch 24-hour storm event to Chattanooga's WCTS as measured at Chattanooga Manhole ID S082P007.

### **3.6 Signal Mountain WWTP Bypass**

#### **3.6.1 Remediation Plan**

**Description:** The Signal Mountain Remediation Plan is a document that describes a detailed approach to eliminate bypasses at the Signal Mountain WWTP. The Remediation Plan includes a detailed analysis of alternative remedial options considered, including the results of the pilot studies conducted as part of the alternatives analysis, and explanation of the basis for WWTa's selection of remedial measures. The document includes a detailed description of all selected remedial measures to eliminate bypasses at the Signal Mountain WWTP.

**Status:** The WWTa has completed a draft and submitted to TDEC/EPA on September 6<sup>th</sup>, 2024. This document is currently under review by TDEC and EPA.

#### **3.6.2 Completion of Construction Remediation Plan**

**Description:** Pursuant to Paragraph 28 of the Consent Decree, the remedial measures of the Signal Mountain Remediation Plan shall be constructed no later than five (5) years from the date of EPA/TDEC approval of the Signal Mountain Remediation Plan.

**Status:** This project is currently under design.

## 4 Additional Work

---

According to paragraph 34(c) of the CD, WWTa is required to include in this Report “any additional information WWTa determines is appropriate to demonstrate that WWTa is implementing the remedial actions required under this Consent Decree in an adequate and timely manner.” The purpose of this section is to address this requirement of the CD.

In addition to the work progress achieved in accordance with the CD as described in the previous sections, WWTa continued to implement remedial and improvement efforts under the existing Capital Improvement Program during the Reporting Period. The work described below is aimed at assessing and improving Hamilton County WWTa’s Interceptor Sewer System (“ISS”). While not required by the CD, these projects directly impact WWTa’s on-going effort to reduce and eliminate SSOs.

### 4.1 e2i2 SSO Abatement Program (West Chickamauga)

**Description:** The WWTa is participating in the e2i2 SSO Abatement Program, which is a joint effort with the City of Chattanooga to reduce SSOs near the regional connection from the City of East Ridge and the City of Chattanooga. The project includes a total equalization (EQ) storage volume of 30 million gallons (MG) along with a wet weather pump station to increase sewer capacity.

**Status:** This project is currently under construction.

### 4.2 Lee Hwy PS Force Main Extension

**Description:** This project involves the extension of the force main from the Lee Hwy Pump Station. The purpose of the project is to reduce a SSO in the Chattanooga sewer system by discharging at a location with additional hydraulic capacity. The project scope includes the following items: 6,200 LF of new 18-inch diameter pipe; 4 new air release valves; 390 LF of 36-inch jack and bore.

**Status:** This project is currently under construction.

### 4.3 PSLP Program

**Description:** The Private Service Lateral Program (PSLP) was initiated to address I/I from resident or commercial sewer line connections. This program uses master plumbers, general contractors, review contractors and sewer line inspections to prevent I&I from entering the main sewer line and preventing wastewater from going into the environment due to service lateral defects or pipe material.

**Status:** The WWTa completed the following items during the reporting period of July 1, 2024 – January 15, 2025: 6 cleanouts repaired; 221 new cleanouts installed; 1,904 LF of 4-inch pipe installed; 17 LF of 6-inch pipe installed; 6,879 LF of 4-inch CIPP installed; 181 LF of 6-inch CIPP installed.

## **5 Anticipated Work**

---

### **5.1 Quarterly Report No. 3**

The WWTa plans to develop and submit Quarterly Report No. 3 in accordance with Paragraph 33 of the Consent Decree.

### **5.2 Quarterly Report No. 4**

The WWTa plans to develop and submit Quarterly Report No. 4 in accordance with Paragraph 33 of the Consent Decree.

### **5.3 Semi-Annual Work Progress Report No. 2**

The WWTa plans to develop and submit Semi-Annual Report No. 2 in accordance with Paragraph 34 of the Consent Decree.

### **5.4 Annual Work Progress Report No. 1**

The WWTa plan to develop and submit Annual Work Progress Report No. 1 in accordance with Paragraph 34 of the Consent Decree.

### **5.5 Sanitary Sewer Evaluation/Rehabilitation (SSER) Work Plan**

The WWTa plans to develop and submit the SSER Work Plan in accordance with Paragraph 22 of the Consent Decree.

### **5.6 Incident Response Plan**

The WWTa plans to develop and submit the Incident Response Plan in accordance with Appendix E – Paragraph b of the Consent Decree.

## **APPENDIX A**

# Hamilton County WWTA Consent Decree Progress Reporting

CD Effective Date: 7/16/2024  
Status Date: 2/6/2025  
Status Month: 7

Complete
✓

CD or CMOM
CD
CMOM

Status
Not Started
In Progress
Submitted Public Review Submittal
Under Review by TDEC/EPA
Operational
Complete

Item No.	Complete	Consent Decree Requirement	CD or CMOM	WWTA to EPA (Months)	Due to EPA (includes 45 day Public comment/ 15 day Response)	Submitted for Public Comments	Submitted to EPA	CD Reference	Status	Notes
1		Early Action Projects - Construction						Paragraph 20		
a	✓	Soddy Daisy Equalization Station	CD	36	7/16/2027			Paragraph 21	Operational	
b	✓	East Ridge Sub-basins 3C and 4B Rehab	CD	36	7/16/2027			Paragraph 21	Complete	
c	✓	Lookout Mountain Sub-basins 2, 5, 6 and 9 Rehab	CD	36	7/16/2027			Paragraph 21	Complete	
d	✓	Red Bank Sub-basin 5 Rehabilitation	CD	36	7/16/2027			Paragraph 21	Complete	
e	✓	Red Bank Sub-basin 6 Rehabilitation	CD	36	7/16/2027			Paragraph 21	Complete	
f	✓	Red Bank Sub-basin 7 Rehabilitation	CD	36	7/16/2027			Paragraph 21	Complete	
g	✓	East Ridge Basin 10 Rehabilitation	CD	N/A				Appendix A	Complete	
h	✓	East Ridge I-75 Collector Sewer Replacement	CD	N/A				Appendix A	Complete	
i	✓	Roy Lane, Snow Hill, Green Gap PS Upgrades	CD	N/A				Appendix A	Operational	
j	✓	Lee Hwy Pump Station and Force Main	CD	N/A				Appendix A	Operational	
k	✓	Short Tail Springs Pump Station and Force Main	CD	N/A				Appendix A	Operational	
2		Sanitary Sewer Evaluation/Rehabilitation (SSER)						Paragraph 22		
a		SSER Work Plan	CD	13	8/16/2025			Paragraph 22	In Progress	
3		Sewer Basin Group 1						Paragraph 23		
a		Assessment	CD	48	7/16/2028			Paragraph 23	In Progress	
b		Group Evaluation Report	CD	62	9/16/2029			Paragraph 23.a	In Progress	
c		Rehabilitation Plan	CD	62	9/16/2029			Paragraph 23.b	In Progress	
d		Design and Construction	CD	108	7/16/2033			Paragraph 23.b	In Progress	
e		Rehabilitation Report	CD	121	8/16/2034			Paragraph 24	Not Started	
f		Hydraulic Model Development	CMOM	48	7/16/2028			Appendix E - Paragraph d	In Progress	
g		Model Report	CMOM	66	1/16/2030			Appendix E - Paragraph d(4)	Not Started	
4		Sewer Basin Group 2						Paragraph 23		
a		Assessment	CD	72	7/16/2030			Paragraph 23	Not Started	
b		Group Evaluation Report	CD	86	9/16/2031			Paragraph 23.a	Not Started	



Item No.	Complete	Consent Decree Requirement	CD or CMOM	WWTA to EPA (Months)	Due to EPA (includes 45 day Public comment/ 15 day Response)	Submitted for Public Comments	Submitted to EPA	CD Reference	Status	Notes
c		Rehabilitation Plan	CD	86	9/16/2031			Paragraph 23.b	Not Started	
d		Design and Construction	CD	126	1/16/2035			Paragraph 23.b	Not Started	
e		Rehabilitation Report	CD	139	2/16/2036			Paragraph 24	Not Started	
f		Hydraulic Model Development	CMOM	72	7/16/2030			Appendix E - Paragraph d	Not Started	
g		Model Report	CMOM	90	1/16/2032			Appendix E - Paragraph d(4)	Not Started	
<b>5</b>		<b>Sewer Basin Group 3</b>						<b>Paragraph 23</b>		
a		Assessment	CD	106	5/16/2033			Paragraph 23	Not Started	
b		Group Evaluation Report	CD	120	7/16/2034			Paragraph 23.a	Not Started	
c		Rehabilitation Plan	CD	120	7/16/2034			Paragraph 23.b	Not Started	
d		Design and Construction	CD	151	2/16/2037			Paragraph 23.b	Not Started	
e		Rehabilitation Report	CD	164	3/16/2038			Paragraph 24	Not Started	
f		Hydraulic Model Development	CMOM	106	5/16/2033			Appendix E - Paragraph d.	Not Started	
g		Model Report	CMOM	124	11/16/2034			Appendix E - Paragraph d(4)	Not Started	
<b>6</b>		<b>Sewer Basin Group 4</b>						<b>Paragraph 23</b>		
a		Assessment	CD	120	7/16/2034			Paragraph 23	Not Started	
b		Group Evaluation Report	CD	134	9/16/2035			Paragraph 23.a	Not Started	
c		Rehabilitation Plan	CD	134	9/16/2035			Paragraph 23.b	Not Started	
d		Design and Construction	CD	187	2/16/2040			Paragraph 23.b	Not Started	
e		Rehabilitation Report	CD	200	3/16/2041			Paragraph 24	Not Started	
f		Hydraulic Model Development	CMOM	120	7/16/2034			Appendix E - Paragraph d	Not Started	
g		Model Report	CMOM	138	1/16/2036			Appendix E - Paragraph d(4)	Not Started	
<b>7</b>		<b>Sewer Basin Group 5</b>						<b>Paragraph 23</b>		
a		Assessment	CD	136	11/16/2035			Paragraph 23	Not Started	
b		Group Evaluation Report	CD	150	1/16/2037			Paragraph 23.a	Not Started	
c		Rehabilitation Plan	CD	150	1/16/2037			Paragraph 23.b	Not Started	
d		Design and Construction	CD	223	2/16/2043			Paragraph 23.b	Not Started	
e		Rehabilitation Report	CD	236	3/16/2044			Paragraph 24	Not Started	
f		Hydraulic Model Development	CMOM	136	11/16/2035			Appendix E - Paragraph d	Not Started	
g		Model Report	CMOM	154	5/16/2037			Appendix E - Paragraph d(4)	Not Started	
<b>8</b>		<b>Service Area Performance Standards, Plans, and Reports</b>						<b>Paragraph 25</b>		
<b>a</b>		<b>Service Area Progress Reports (with Group Rehabilitation Reports)</b>						<b>Paragraph 25.a</b>		
i		East Ridge	CD	121	8/16/2034			Paragraph 25.a	Not Started	
ii		Signal Mountain	CD	121	8/16/2034			Paragraph 25.a	Not Started	
iii		Ooltewah	CD	121	8/16/2034			Paragraph 25.a	Not Started	
iv		Red Bank	CD	121	8/16/2034			Paragraph 25.a	Not Started	
v		Lookout Mountain	CD	121	8/16/2034			Paragraph 25.a	Not Started	
vi		Soddy Daisy	CD	121	8/16/2034			Paragraph 25.a	Not Started	
<b>b</b>		<b>Service Area Performance Standards</b>						<b>Paragraph 25.a</b>		

Item No.	Complete	Consent Decree Requirement	CD or CMOM	WWTA to EPA (Months)	Due to EPA (includes 45 day Public comment/ 15 day Response)	Submitted for Public Comments	Submitted to EPA	CD Reference	Status	Notes
i		East Ridge	CD	216	7/16/2042			Paragraph 25.a(1)	In Progress	
ii		Signal Mountain	CD	N/A				Paragraph 25.a(2)	In Progress	
iii	✓	Ooltewah	CD	0	7/16/2024	N/A	N/A	Paragraph 25.a(3)	Complete	
iv		Red Bank	CD	192	7/16/2040			Paragraph 25.a(4)	In Progress	
v		Lookout Mountain	CD	60	7/16/2029			Paragraph 25.a(5)	In Progress	
vi	✓	Soddy Daisy	CD	0	7/16/2024	N/A	N/A	Paragraph 25.a(6)	Complete	
c		<b>Service Area Rehabilitation Reports</b>						<b>Paragraph 25.b</b>		
i		East Ridge	CD	134	9/16/2035			Paragraph 25.b	Not Started	
ii		Signal Mountain	CD	134	9/16/2035			Paragraph 25.b	Not Started	
iii		Ooltewah	CD	134	9/16/2035			Paragraph 25.b	Not Started	
iv		Red Bank	CD	134	9/16/2035			Paragraph 25.b	Not Started	
v		Lookout Mountain	CD	134	9/16/2035			Paragraph 25.b	Not Started	
vi		Soddy Daisy	CD	134	9/16/2035			Paragraph 25.b	Not Started	
d		<b>Service Area Interim Performance Goals</b>						<b>Paragraph 25.c</b>		
i		East Ridge	CD	60	7/16/2029			Paragraph 25.c	Not Started	
ii		Signal Mountain	CD	60	7/16/2029			Paragraph 25.c	Not Started	
iii		Ooltewah	CD	60	7/16/2029			Paragraph 25.c	Not Started	
iv		Red Bank	CD	60	7/16/2029			Paragraph 25.c	Not Started	
v		Lookout Mountain	CD	60	7/16/2029			Paragraph 25.c	Not Started	
vi		Soddy Daisy	CD	60	7/16/2029			Paragraph 25.c	Not Started	
9		<b>CMOM Programs</b>						<b>Paragraph 27</b>		
a	✓	Public Document Repository	CD	2	9/16/2024	N/A	7/16/2024	Paragraph 11	Complete	
b		Sewer Overflow Response Plan (SORP)	CMOM	7	2/16/2025	11/18/2024	1/17/2025	Appendix E - Paragraph a.	Under Review by TDEC/EPA	
c		Incident Response Plan (IRP)	CMOM	13	8/16/2025			Appendix E - Paragraph b.	In Progress	
d		Information Management System (IMS)	CMOM	37	8/16/2027			Appendix E - Paragraph c.	In Progress	
e		Sewer Mapping Program	CMOM	36	7/16/2027			Appendix E - Paragraph e.	In Progress	
f		Gravity Sewer System Operations and Maintenance Program	CMOM	25	8/16/2026			Appendix E - Paragraph f.	In Progress	
g		Corrosion Control Program	CMOM	25	8/16/2026			Appendix E - Paragraph g.	Not Started	
h		Pump Station Operations and Preventative Maintenance Program	CMOM	25	8/16/2026			Appendix E - Paragraph h.	In Progress	
i		Fats, Oils and Grease (FOG) Control Program	CMOM	31	2/16/2027			Appendix E - Paragraph i.	In Progress	
j		Capacity Assurance Program (CAP)	CMOM	49	8/16/2028			Appendix E - Paragraph j.	In Progress	
k		Financing and Cost Analysis Program	CMOM	19	2/16/2026			Appendix E - Paragraph k.	In Progress	
l		<b>Legal Support Program</b>						<b>Appendix E - Paragraph l.</b>		
i		Rules and Regulation Program	CMOM	31	2/16/2027			Appendix E - Paragraph l.(1)	In Progress	
ii		FOG Control Legal Support Program	CMOM	31	2/16/2027			Appendix E - Paragraph l.(2)	In Progress	
iii		Private Lateral Legal Support Program	CMOM	31	2/16/2027			Appendix E - Paragraph l.(3)	In Progress	



Item No.	Complete	Consent Decree Requirement	CD or CMOM	WWTA to EPA (Months)	Due to EPA (includes 45 day Public comment/ 15 day Response)	Submitted for Public Comments	Submitted to EPA	CD Reference	Status	Notes
iv	✓	Amendment to PSLP Program	CMOM	6	1/16/2025			Appendix E - Paragraph I.(3)	Complete	
10		<b>Signal Mountain WWTP Bypass</b>						<b>Paragraph 28</b>		
a		Remediation Plan	CD	2	9/16/2024	7/16/2024	9/6/2024	Paragraph 28	Under Review by TDEC/EPA	
b		Completion of Construction for Remediation Plan	CD	62	9/16/2029			Paragraph 28	In Progress	
c		WWTP Optimization Plan	CD	75	10/16/2030			Paragraph 28.b(1)	Not Started	
d		NPDES Permit Modification TDEC Submittal	CD	78	1/16/2031			Paragraph 28.b(1)	Not Started	
e		NPDES Permit Modification TDEC Review	CD	84	7/16/2031			Paragraph 28.b(1)	Not Started	
f		Completion of Construction for Optimization Plan	CD	111	10/16/2033			Paragraph 28.b(1)	Not Started	
g		Eliminate WWTP Diversion around Biological Treatment	CD	240	7/16/2044			Paragraph 28.b(2)	Not Started	
11		<b>Progress Reporting</b>								
a		Program Management	CD	240				N/A	In Progress	
b		<b>Quarterly Reports</b>						<b>Paragraph 33</b>		
i	✓	Q1 Report	CD	4	11/16/2024	N/A		Paragraph 33	Complete	
ii	✓	Q2 Report	CD	7	2/16/2025			Paragraph 33	Complete	
iii		Q3 Report	CD	10	4/30/2025			Paragraph 33	Not Started	
iv		Q4 Report	CD	13	7/30/2025			Paragraph 33	Not Started	
v		Q5 Report	CD	16	10/30/2025			Paragraph 33	Not Started	
vi		Q6 Report	CD	19	1/30/2026			Paragraph 33	Not Started	
vii		Q7 Report	CD	22	4/30/2026			Paragraph 33	Not Started	
viii		Q8 Report	CD	25	7/30/2026			Paragraph 33	Not Started	
ix		Q9 Report	CD	28	10/30/2026			Paragraph 33	Not Started	
x		Q10 Report	CD	31	1/30/2027			Paragraph 33	Not Started	
xi		Q11 Report	CD	34	4/30/2027			Paragraph 33	Not Started	
xii		Q12 Report	CD	37	7/30/2027			Paragraph 33	Not Started	
xiii		Q13 Report	CD	40	10/30/2027			Paragraph 33	Not Started	
xiv		Q14 Report	CD	43	1/30/2028			Paragraph 33	Not Started	
xv		Q15 Report	CD	46	4/30/2028			Paragraph 33	Not Started	
xvi		Q16 Report	CD	49	7/30/2028			Paragraph 33	Not Started	
xvii		Q17 Report	CD	52	10/30/2028			Paragraph 33	Not Started	
xviii		Q18 Report	CD	55	1/30/2029			Paragraph 33	Not Started	
xix		Q19 Report	CD	58	4/30/2029			Paragraph 33	Not Started	
xx		Q20 Report	CD	61	7/30/2029			Paragraph 33	Not Started	
c		<b>Semi-Annual Work Progress Reports</b>						<b>Paragraph 34</b>		
i		SA1 Report	CD	7	2/16/2025			Paragraph 34	In Progress	
ii		SA2 Report	CD	13	8/16/2025			Paragraph 34	Not Started	

Item No.	Complete	Consent Decree Requirement	CD or CMOM	WWTA to EPA (Months)	Due to EPA (includes 45 day Public comment/ 15 day Response)	Submitted for Public Comments	Submitted to EPA	CD Reference	Status	Notes
iii		SA3 Report	CD	19	1/30/2026			Paragraph 34	Not Started	
iv		SA4 Report	CD	25	7/30/2026			Paragraph 34	Not Started	
v		SA5 Report	CD	31	1/30/2027			Paragraph 34	Not Started	
vi		SA6 Report	CD	37	7/30/2027			Paragraph 34	Not Started	
vii		SA7 Report	CD	43	1/30/2028			Paragraph 34	Not Started	
viii		SA8 Report	CD	49	7/30/2028			Paragraph 34	Not Started	
ix		SA9 Report	CD	55	1/30/2029			Paragraph 34	Not Started	
x		SA10 Report	CD	61	7/30/2029			Paragraph 34	Not Started	
xi		SA11 Report	CD	67	1/30/2030			Paragraph 34	Not Started	
xii		SA12 Report	CD	73	7/30/2030			Paragraph 34	Not Started	
<b>d</b>		<b>Annual Work Progress Reports</b>						<b>Paragraph 34</b>		
i		Year 1 Report	CD	13	7/30/2025			Paragraph 34	Not Started	
ii		Year 2 Report	CD	25	7/30/2026			Paragraph 34	Not Started	
iii		Year 3 Report	CD	37	7/30/2027			Paragraph 34	Not Started	
iv		Year 4 Report	CD	49	7/30/2028			Paragraph 34	Not Started	
v		Year 5 Report	CD	61	7/30/2029			Paragraph 34	Not Started	
vi		Year 6 Report	CD	73	7/30/2030			Paragraph 34	Not Started	
vii		Year 7 Report	CD	85	7/30/2031			Paragraph 34	Not Started	
viii		Year 8 Report	CD	97	7/30/2032			Paragraph 34	Not Started	
ix		Year 9 Report	CD	109	7/30/2033			Paragraph 34	Not Started	
x		Year 10 Report	CD	121	7/30/2034			Paragraph 34	Not Started	
xi		Year 11 Report	CD	133	7/30/2035			Paragraph 34	Not Started	
xii		Year 12 Report	CD	145	7/30/2036			Paragraph 34	Not Started	
xiii		Year 13 Report	CD	157	7/30/2037			Paragraph 34	Not Started	
xiv		Year 14 Report	CD	169	7/30/2038			Paragraph 34	Not Started	
xv		Year 15 Report	CD	181	7/30/2039			Paragraph 34	Not Started	
xvi		Year 16 Report	CD	193	7/30/2040			Paragraph 34	Not Started	
xvii		Year 17 Report	CD	205	7/30/2041			Paragraph 34	Not Started	
xviii		Year 18 Report	CD	217	7/30/2042			Paragraph 34	Not Started	
xix		Year 19 Report	CD	229	7/30/2043			Paragraph 34	Not Started	
xx		Year 20 Report	CD	241	7/30/2044			Paragraph 34	Not Started	
<b>e</b>		<b>Annual Reports</b>								
i		Year 1 Report	CD	13	7/30/2025			Paragraph 35	Not Started	
ii		Year 2 Report	CD	25	7/30/2026			Paragraph 35	Not Started	
iii		Year 3 Report	CD	37	7/30/2027			Paragraph 35	Not Started	
iv		Year 4 Report	CD	49	7/30/2028			Paragraph 35	Not Started	
v		Year 5 Report	CD	61	7/30/2029			Paragraph 35	Not Started	
vi		Year 6 Report	CD	73	7/30/2030			Paragraph 35	Not Started	
vii		Year 7 Report	CD	85	7/30/2031			Paragraph 35	Not Started	
viii		Year 8 Report	CD	97	7/30/2032			Paragraph 35	Not Started	

Item No.	Complete	Consent Decree Requirement	CD or CMOM	WWTA to EPA (Months)	Due to EPA (includes 45 day Public comment/ 15 day Response)	Submitted for Public Comments	Submitted to EPA	CD Reference	Status	Notes
ix		Year 9 Report	CD	109	7/30/2033			Paragraph 35	Not Started	
x		Year 10 Report	CD	121	7/30/2034			Paragraph 35	Not Started	
xi		Year 11 Report	CD	133	7/30/2035			Paragraph 35	Not Started	
xii		Year 12 Report	CD	145	7/30/2036			Paragraph 35	Not Started	
xiii		Year 13 Report	CD	157	7/30/2037			Paragraph 35	Not Started	
xiv		Year 14 Report	CD	169	7/30/2038			Paragraph 35	Not Started	
xv		Year 15 Report	CD	181	7/30/2039			Paragraph 35	Not Started	
xvi		Year 16 Report	CD	193	7/30/2040			Paragraph 35	Not Started	
xvii		Year 17 Report	CD	205	7/30/2041			Paragraph 35	Not Started	
xviii		Year 18 Report	CD	217	7/30/2042			Paragraph 35	Not Started	
xix		Year 19 Report	CD	229	7/30/2043			Paragraph 35	Not Started	
xx		Year 20 Report	CD	241	7/30/2044			Paragraph 35	Not Started	
<b>f</b>		<b>Five Year Review Report</b>						<b>Paragraph 36</b>		
i		Year 5 Report	CD	62	7/30/2029			Paragraph 36	Not Started	
ii		Year 10 Report	CD	122	7/30/2034			Paragraph 36	Not Started	
iii		Year 15 Report	CD	182	7/30/2039			Paragraph 36	Not Started	
iv		Year 20 Report	CD	242	7/30/2044			Paragraph 36	Not Started	
<b>12</b>		<b>Additional CD Projects</b>								
a		Permanent Flow Metering Network	CD	N/A				N/A	In Progress	
a		e2i2 - West Chickamauga	CD	N/A				N/A	In Progress	
b		Old Lee Hwy Force Main Extension	CD	N/A				N/A	In Progress	
c		EQ Station - Red Bank	CD	N/A				N/A	Not Started	
d		East Ridge PS and FM Upgrades for EQ	CD	N/A				N/A	Not Started	
e		Signal Mountain Basin 2D, 5, and 6	CD	N/A				N/A	In Progress	
f		Signal Mountain Collection System Contingency	CD	N/A				N/A	In Progress	
g		Pump Station Upgrades - Remote Telemetry System Implementation	CD	N/A				N/A	Not Started	
h		Pump Station Generators/DBS Systems	CD	N/A				N/A	Not Started	
i		Pump Station Rehabilitation Program	CD	N/A				N/A	Not Started	
k		West Brow Oval PS Rehab	CD	N/A				N/A	In Progress	
l		Soddy Daisy Basins 1, 2, 3, and 4 Rehabilitation	CD	N/A				N/A	Not Started	
m		Hurricane Creek/Rhinehart Valley Rehabilitation	CD	N/A				N/A	In Progress	
n		Residual Basin Rehabilitation	CD	N/A				N/A	Not Started	

## **APPENDIX B**



**Development Resource Center**  
**1250 Market Street, Suite 3050**  
**Chattanooga, TN 37402**  
**Tel: 423-209-7842**  
**Fax: 423-209-7843**

**Michael C. Patrick**  
**Executive Director**

November 8, 2024

EES Case Management Unit  
Environment and Natural Resources Division  
U.S. Department of Justice  
Box 7611  
Washington, D.C. 20044-7611

Re: DJ # 90-5-1-1-11394 – Schedule for Reporting

The Hamilton County WWTA requests clarification from the United States Environmental Protection Agency (EPA) for the reporting period for documents required in Section IX – Reporting Requirements of the Consent Decree (CD). The WWTA has historically submitted documents to the Tennessee Department of Environment and Conservation (TDEC) on a calendar quarter, and the WWTA requests to match the reporting periods for documents required by the CD. Therefore, the WWTA requests the following schedule for each CD report required in Section IX – Reporting Requirements.

- **Quarterly Reports (Paragraph 33 of the CD)**
  - Quarterly Report No. 1:
    - Reporting Period: 7/16/2024-10/15/2024
    - Submittal Date: 11/14/2024
  - Quarterly Report No. 2:
    - Reporting Period: 10/16/2024-1/15/2025
    - Submittal Date: 2/14/2025
  - Quarterly Report No. 3:
    - Reporting Period: 1/1/2025-3/31/2025
    - Submittal Date: 4/30/2025
  - Quarterly Report No. 4:
    - Reporting Period: 4/1/2025-6/30/2025
    - Submittal Date: 7/30/2025
  - Quarterly Report No. 5:
    - Reporting Period: 7/1/2025-9/30/2025
    - Submittal Date: 10/30/2025
  - Quarterly Report No. 6:
    - Reporting Period: 10/1/2025-12/31/2025
    - Submittal Date: 1/30/2026
  - All Subsequent Quarterly Reports:
    - Reporting Period: Calendar Quarters
    - Submittal Date: 30 days after the end of the Calendar Quarter
- **Semi-Annual Work Progress Reports (Paragraph 34 of the CD)**
  - Semi-Annual Work Progress Report No. 1:
    - Reporting Period: 7/16/2024-1/15/2025
    - Submittal Date: 2/14/2025
  - Semi-Annual Work Progress Report No. 2:

- Reporting Period: 1/1/2025-6/30/2025
  - Submittal Date: 7/30/2025
- Semi-Annual Work Progress Report No. 3:
  - Reporting Period: 7/1/2025-12/31/2025
  - Submittal Date: 1/30/2026
- All Subsequent Semi-Annual Work Progress Reports:
  - Reporting Period: Calendar Semi-Annual Period
  - Submittal Date: 30 days after the end of the Calendar Semi-Annual Period
- **Annual Work Progress Reports (Paragraph 34 of the CD)**
  - Annual Work Progress Report No. 1:
    - Reporting Period: 7/1/2024-6/30/2025
    - Submittal Date: 7/30/2025
  - Annual Work Progress Report No. 2:
    - Reporting Period: 7/1/2025-6/30/2026
    - Submittal Date: 7/30/2026
  - All Subsequent Annual Work Progress Reports:
    - Reporting Period: Annual Period beginning on July 1 and ending on June 30
    - Submittal Date: 30 days after the end of each Annual Period
- **Annual Reports (Paragraph 35 of the CD)**
  - Annual Report No. 1:
    - Reporting Period: 7/1/2024-6/30/2025
    - Submittal Date: 7/30/2025
  - Annual Report No. 2:
    - Reporting Period: 7/1/2025-6/30/2026
    - Submittal Date: 7/30/2026
  - All Subsequent Annual Reports:
    - Reporting Period: Annual Period beginning on July 1 and ending on June 30
    - Submittal Date: 30 days after the end of each Annual Period
- **Five Year Review (Paragraph 36 of the CD)**
  - Five Year Review No. 1:
    - Reporting Period: 7/1/2024-6/30/2029
    - Submittal Date: 7/30/2029
  - Five Year Review No. 2:
    - Reporting Period: 7/1/2029-6/30/2034
    - Submittal Date: 7/30/2034
  - All Subsequent Five Year Reviews:
    - Reporting Period: Five Year Period beginning on July 1 and ending on June 30
    - Submittal Date: 30 days after the end of each Five Year Period

We look forward to receiving EPA's and TDEC's approval for the above-referenced reporting periods. In the meantime, please let me know if you have questions regarding our request.

Sincerely,



Michael Patrick, P.E.  
Executive Director

cc:

Chief, Clean Water Enforcement Branch  
Water Protection Division  
US EPA Region 4  
61 Forsyth St., SW  
Atlanta, GA 30303

Wilson Buntin  
Senior Assistant Attorney General  
Office of the Attorney General  
Environmental Division  
P. O. Box 20207  
Nashville, TN 37202

Manager of Enforcement and Compliance Section, Division of Water Resources  
Tennessee Department of Environment and Conservation  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, TN 37232-1101

Patrick Parker  
Assistant General Counsel  
Office of General Counsel  
Tennessee Department of Environment and Conservation  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 2nd Floor  
Nashville, TN 37232-1101