STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
COLUMBIA ENVIRONMENTAL FIELD OFFICE
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COLUMBIA, TENNESSEE 38401
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April 30, 2024

CERTIFIED MAIL
RETURN RECIEPT REQUESTED
RECEIPT #9489 0090 0027 6523 1532 99

The Honorable Mayor Marilyn Howard
736 West High Street
Manchester, TN 37349

Re: Self-Imposed Moratorium for Flow to Manholes A39 and A43
NPDES Permit# TN0025038
Manchester STP
Manchester, Coffee County, Tennessee

Dear Mayor Howard:

On February 9, 2024, the City of Manchester was issued a National Pollutant Discharge Elimination System Permit authorizing the collection, treatment, and discharge of wastewater by the Manchester Sewage Treatment Plant. Part II, Section 2.3.2, of the permit contains language concerning sanitary sewer overflows and what is considered a chronic overflow. The language is attached. The review of existing collection system records indicates that from March 15, 2024, through April 8, 2024, Manchester's wastewater collection system exceeded five releases/overflows at two manholes: A39 and A43. Based on this review, The Division of Water Resources has determined that chronic overflow conditions exist at A39 and A43 in Manchester's collection system.

As of the date of this letter, the City of Manchester shall enforce a self-imposed moratorium on connections to Manchester's wastewater collection system that ultimately flow to A39 and A43. Within thirty (30) days, the City of Manchester shall inform the Division in writing of the process to be implemented to enforce the moratorium. The documentation shall also provide a list of all connections that have been approved by the City of Manchester as of the date of this letter.

If the City of Manchester desires to remove this moratorium, the permit contains language describing the information the Division needs prior to the moratorium being relieved. The moratorium may be relieved after the following:

1. An authorized representative of the Commissioner of the Department of Environment and Conservation has approved an engineering report and construction plans and specifications prepared in accordance with accepted engineering practices for correction of the problem;
2. The correction work is underway; and
3. The cumulative, peak-design flows potentially added from new connections and line extensions upstream of any chronic sanitary sewer overflow or release point are less than or proportional to the amount of inflow and infiltration removal documented upstream from that point.

   The inflow and infiltration reduction must be measured by the permittee using practices that are customary in the environmental engineering field and reported in an attachment to the permittee's DMR and uploaded to NetDMR. The data measurement period shall be sufficient to account for seasonal rainfall patterns and seasonal groundwater table elevations.

If you have questions concerning this correspondence or if we may be of further assistance to you, please feel free to contact me at (931) 444-9187 or by email at Sherry.Glass@tn.gov.

Sincerely,

Sherry R. Glass

Sherry R. Glass
Environmental Manager
Division of Water Resources
Columbia Environmental Field Office

cc: Austin Haithcote — Manchester Chief WWTP Operator and Pretreatment Coordinator
Jessica Murphy — Compliance & Enforcement Unit
DeWitt Logsdon — EPS3

2.3.2. Sanitary Sewer Overflows and Releases

a) For publicly owned treatment works (POTW) or domestic wastewater treatment plants, sanitary sewer overflows, including dry-weather overflows and wet weather overflows, are prohibited.

b) Releases caused by improper operation and maintenance, which is to be determined by the Commissioner based on the totality of the circumstances, are prohibited.

c) The permittee shall operate the collection, transmission, and treatment system so as to avoid sanitary sewer overflows and releases due to improper operation or maintenance. A "release" may be due to improper operation or maintenance of the collection system or may be due to other cause(s).

d) The permittee shall take all reasonable steps to minimize any adverse impact associated with sanitary sewer overflows and releases.

e) No new or additional flows shall be added upstream of any point in the collection, transmission, or treatment system that experiences greater than 5 sanitary sewer overflows and/or releases per year[2] or would otherwise overload any portion of the system. Unless there is a specific enforcement action to the contrary, the permittee is relieved of this requirement after the three items under Section 2.3.2 Part e.

[2] This includes dry weather overflows, wet weather overflows, dry weather releases and wet weather releases.