



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
CHATTANOOGA ENVIRONMENTAL FIELD OFFICE  
1301 Riverfront Parkway Suite 206  
CHATTANOOGA, TENNESSEE 37402 PHONE (423) 634-5745  
STATEWIDE 1-888-891-8332 FAX (423) 634-6389

September 5, 2025

CERTIFIED MAIL

9489 0090 0027 6582 6584 37

The Honorable Philip Cagle  
Mayor, City of Pikeville  
[citymayor@bledsoe.net](mailto:citymayor@bledsoe.net)  
P.O. Box 225  
Pikeville, TN 37367

**Re: Notice of Violation**  
Pikeville STP, Bledsoe County  
NPDES Permit Number: TN0025054

Dear Mayor Cagle:

In response to effluent violations from the Town of Pikeville Sewage Treatment Plant (previously documented in the Notice of Violation to Town of Pikeville on July 8, 2025), the Division has collected water quality samples to analyze E. coli levels in the Sequatchie River. These samples were collected upstream (River Mile 78.4, at the public access boat ramp) and downstream (River Mile 78.3) of the Pikeville sewage treatment plant discharge point. The results are as follows:

Station ID	Sample date	E.coli results (MPN/100mL)	Notes
SEQUA078.4BL*	7/16/2025	365.4	
	8/6/2025	135.4	
	8/14/2025	1046.2	Rain event
	8/20/2025	275.5	
	8/25/2025	727	Rain event
	8/28/2025	248.1	
	9/3/2025	90.9	
SEQUA078.3BL **	7/16/2025	>2419.7 (no dilution)	
	8/6/2025	3076 (10x dilution)	
	8/6/2025	3240 (100x dilution)	
	8/14/2025	>2419.7 (no dilution)	Rain event
	8/20/2025	>2419.7 (no dilution)	
	8/20/2025	>24,197 (10x dilution)	
	8/25/2025	>2419.7	Rain event
	8/25/2025	3654 (10x dilution)	Rain event
	8/25/2025	5210 (100x dilution)	Rain event
	8/28/2025	>2419.7	
	8/28/2025	5475(10x dilution)	
	8/28/2025	5560 (100x dilution)	
	9/3/2025	>2419.7	
	9/3/2025	>24197 (10x dilution)	
	9/3/2025	38730 (100x dilution)	
*SEQUA078.4BL=upstream of Pikeville WWTP at public access boat ramp			
**SEQUA078.3BL=downstream of Pikeville WWTP outfall and approximately 170 yards downstream of SEQUA078.4BL			

Per the Town of Pikeville's permit, the daily max effluent limit for E. coli is 410 #/100mL. High levels of E. coli indicate that the wastewater could pose a risk to recreational activities in the Sequatchie River.

NPDES Permit section 2.3.4. States:

*Adverse Impact*

*The permittee shall take all reasonable steps to minimize any adverse impact to the waters of Tennessee resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.*

This letter serves as a Notice of Violation for violating the conditions of the permit and creating a condition of pollution to the Waters of the State, which are violations of the Tennessee Water Quality Control Act. Please be aware that these violations may subject you to enforcement action. Pursuant to T.C.A. §69-3-115, civil penalties may be assessed for each day a violation occurs or continues.

### **Required Actions:**

- Immediately, but no later than 7 days after receipt of this letter, the Town of Pikeville shall post signage at all reasonable approaches and access points to the Sequatchie River in the Pikeville area, such as boat ramps, that the public may encounter sanitary sewage. The signage should inform persons of the hazards associated with sanitary sewage.
- Town of Pikeville shall begin weekly sampling for E. coli in the Sequatchie River, upstream and downstream of the Pikeville Sewage Treatment Plant discharge point, and retain laboratory results and chain of custody forms for review. The method of analysis used to analyze the samples must be in accordance with the 40 CFR 136, Table IH - List of Approved Microbiological Methods for Ambient Water:

<https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-136>

The sampling should continue until the difference in the results downstream of the discharge point is back to within 10% of the upstream sampling results.

- Please submit a written response to this office by **September 19, 2025**, detailing specific actions with completion dates taken to address these concerns. The response letter can be submitted by email at the address below.

The Division will appreciate your immediate attention to this letter, its requirements, and efforts made to ensure permit compliance and protect the health of the Public and our State's Waterways. If you have any questions or concerns, please contact me at (423) 634-5719 or Jennifer.Innes@tn.gov .

Sincerely,



Jennifer Innes  
Program Manager  
Division of Water Resources

cc: Jessica Murphy, DWR Compliance and Enforcement Unit  
[Jessica.Murphy@tn.gov](mailto:Jessica.Murphy@tn.gov)  
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