



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

July 8, 2025

CERTIFIED MAIL
9489 0090 0027 6582 6596 49

The Honorable Philip Cagle
Mayor
citymayor@bledsoe.net
City of Pikeville
P.O. Box 225
Pikeville, TN 37367

Re: Notice of Violation
Pikeville Sewage Treatment Plant
Compliance Sampling Inspection
NPDES Permit Number: TN0025054
Pikeville, Bledsoe County, Tennessee

Dear Mayor Cagle:

On June 4, 2025, Ms. Angela Oberschmidt and Mr. Elias Vaden of the Division of Water Resources (DWR) performed a Compliance Sampling Inspection (CSI) for City of Pikeville Sewer Treatment Plant (STP). Plant operator Justin Thomas provided information during the inspection. Based on the physical appearance of all treatment units at the time of inspection, DWR returned to the plant on June 17, 18, and 23, 2025, to perform compliance sampling.

Permit

National Pollutant Discharge Elimination System (NPDES) Permit Number TN0025054 was issued June 1, 2025, and will become effective on November 1, 2025. The permit expires on October 31, 2030. The correct receiving waters are listed (Sequatchie River Mile 78.4). The effluent limitations cover the known pollutants and are protective of the classified uses of the Sequatchie River. A new wastewater plant is under construction and will discharge in the same river mile. The previous NPDES Permit Number TN0025054 became effective on December 1, 2023, and shall expire on October 31, 2025. The permit authorizes Pikeville STP to discharge treated municipal wastewater from Outfall 001 to the Sequatchie River at Mile 78.4.

Records and Reports

Monthly Operation Reports (MORs), Discharge Monitoring Reports (DMRs) and Semi-annual Pretreatment Activities Reports are maintained for a minimum of three years. DMRs are submitted

Pikeville STP
06042025 CEI
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electronically through NetDMR. Review of MORs revealed no transcription errors. The Chattanooga Field Office has not received MORs since January 2025. MORs are not attached to NetDMR as required in your permit. MORs have not been received at DWRWW.Report@tn.gov. This is a violation of Part 1.3.4 of your permit.

Facility Site Review

Pikeville is a waste activated sludge plant (WAS) with extended aeration. Clarifiers were inoperable during inspection on June 4, 2025. Large floating solids were observed in every treatment unit (Photo Nos. 1 & 2). Aeration units were light brown in color. Mr. Elias Vaden returned to the plant on June 17, 18, and 23, 2025 to collect effluent samples. The clarifiers were functional when Mr. Vaden returned June 17. Throughout the duration of the inspection, inspectors observed a log jam in the Sequatchie River immediately downstream from the outfall obstructing flow (Photo No. 3). Solids observed throughout the plant could potentially accumulate between Pikeville STP's outfall and the log jam due to obstructed flow. Access to the outfall was difficult due to dense vegetation between Pikeville STP's perimeter fence and the Sequatchie River.

Effluent/Receiving Waters

A review of 2024 and 2025 DMRs submitted to NetDMR revealed no effluent violations. On June 4, the visual quality of the effluent appeared cloudy with evidence of floating sludge blankets at the chlorine contact chamber. Mr. Vaden sampled chlorine throughout the contact chamber on June 23, 2025. On June 23, 2025, chlorine grab samples from the chlorine contact chamber were analyzed by Mr. Vaden after dechlorination, prior to dechlorination but after chlorine addition, and at the point of chlorine addition. Results are as follows:

- After dechlorination: 0.0 mg/L
- Prior to dechlorination but after chlorine addition: 0.0 mg/L
- At the point of chlorine addition: 0.2 mg/L

Composite and grab samples collected and analyzed by Mr. Vaden showed effluent violations. Composite and grab samples collected by Mr. Vaden and analyzed by the Tennessee Department of Health (TDH) laboratory showed effluent violations. The following are violations of Part 1.1.1 your NPDES permit:

Sample Date	Parameter	Value	Permitted Value
6-17-25	E. Coli (#/100mL)	2,419.6	<=941 daily maximum
	Dissolved Oxygen (mg/L)	0.06	>=1.0 monthly average minimum
	Total Residual Chlorine (mg/L)	1.38	<=0.4 daily maximum
6-18-25	Nitrogen, Ammonia total (as N) (mg/L)	16.7	<=12 daily maximum
6-23-25	E. Coli (#/100mL)	2,419.6	<=941 daily maximum
	E. Coli 10x Dilution (#/100mL)	24,196	<=941 daily maximum
	Dissolved Oxygen (mg/L)	0.09	>=1.0 monthly average minimum

The following are additional sample results from TDH laboratory:

Sample Date	Parameter	Value	Permitted Value
6-23-25	Settleable Solids (mL/L)	<0.200	<=1.0 daily maximum

Results for Total Kjeldahl Nitrogen (TKN) and Phosphorus grab samples taken June 23, 2025 are pending at the time of letter issuance. TKN and Phosphorus quarterly grab samples are only reportable and do not have effluent limits per the permit. Laboratory results will be included in the enclosure at the end of this letter.

Self-monitoring Program

Bench sheets and hard copy MORs are kept on site but not submitted to the Division as required per your permit. Effluent and influent samplers did not contain thermometers to ensure composite samples are held within permitted temperature range.

Laboratory

All laboratory equipment is maintained and calibrated properly. All laboratory records are stored appropriately. Laboratory equipment is calibrated by an outside vendor annually.

Operation and Maintenance

Clarifiers were not operational on June 4, 2025. The operator stated parts had been ordered. On June 17, 2025, the operator stated that the effluent flow meter was inoperable. Your permit requires effluent flow measurement.

Sludge Handling

According to operators, sludge is land applied to a permitted field. Pikeville has a biosolids permit, TNB025054. No land application annual reports have been received by the Division since 2021. No records were found for sludge wasting to digester. Every treatment unit exhibited floating solids.

Violations:

- Not submitting Monthly Operation Reports to the Division as required per the permit

TN0025054 Part 1 EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS Subpart 1.3 REPORTING Section 1.3.4 Monthly Report of Operation- *Monthly Operational Reports (MORs) shall be submitted by the 15th day of the month following data collection. Reports shall be submitted by one of the following methods, presented below in order of preference:*

- 1) *Using MyTDEC Forms, if available.*
- 2) *Submitting both a signed and certified copy in pdf format, uploaded as an attachment to NetDMR, and a copy of the native format spreadsheet file emailed to DWRWW.Report@tn.gov and TDEC.Chattanooga.EFO@tn.gov.*

3) *Submitting signed and certified forms to the EFO at the following address: STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION DIVISION OF WATER RESOURCES Chattanooga Environmental Field Office 1301 Riverfront Parkway, Suite 206 Chattanooga, Tennessee 37402*

- Discharging effluent that exceeds permitted numeric effluent limitations

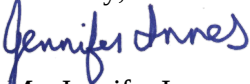
TN0025054 Part 1 EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS Subpart 1.1 NUMERIC AND NARRATIVE EFFLUENT LIMITATIONS Section 1.1.1 Numeric Limitations- *The Town of Pikeville is authorized to discharge treated municipal wastewater from Outfall 001 to Sequatchie River Mile 78.7 from a treatment facility with a design capacity of 0.366 MGD. Discharge from Outfall 001 shall be limited and monitored by the permittee as specified...*

Required Actions:

- Please submit a written response to the Division within 30 days of receiving this report. The response should detail what corrective actions have been implemented regarding all violations.
- Please submit all required reports to the Division per TN0025054 Section 1.3.4 by Tuesday, July 15, 2025.

The Division would like to thank Mr. Thomas for his time and assistance during the inspection. If you have any questions concerning either the inspection or this report, please contact Ms. Angela Oberschmidt at 423-333-7251 or angela.oberschmidt@tn.gov, or Mr. Elias Vaden at 423-637-9188 or elias.vaden@tn.gov.

Sincerely,



Ms. Jennifer Innes
Program Manager
Division of Water Resources
Chattanooga Field Office

cc: Justin Thomas, Town of Pikeville, pikevillewastewater@aol.com
cc: Angela Oberschmidt, TDEC-DWR, angela.oberschmidt@tn.gov
cc: Elias Vaden, TDEC-DWR, elias.vaden@tn.gov

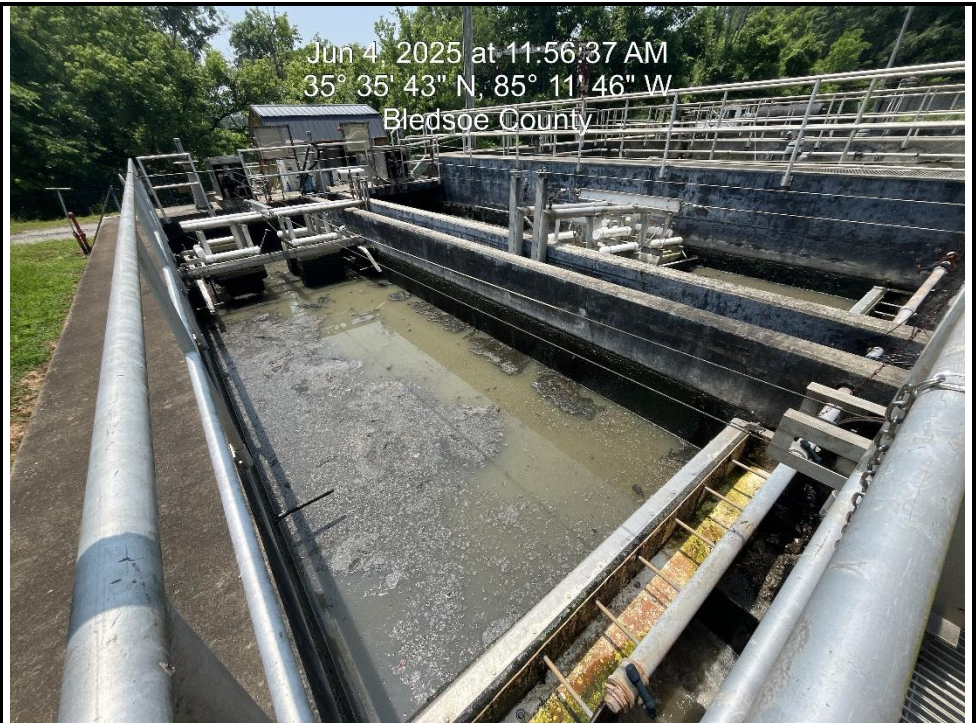
Enclosure

Pikeville Sewer Treatment Plant Notice of Violation

Photo No.	Date
1	06-04-2025
Description Floating solids are shown in Pikeville STP chlorine contact chamber. Photo taken facing east.	



Photo No.	Date
2	06-04-2025
Description Floating solids are shown in a clarifier unit at Pikeville STP. Photo taken facing southwest.	



Pikeville Sewer Treatment Plant Notice of Violation

Photo No.

3

Date

06-17-2025

Description

A logjam is shown in the Sequatchie River immediately downstream from the outfall obstructing flow. Photo taken facing south.



Jun 17, 2025 at 9:43:10 AM
35° 35' 41" N, 85° 41' 48" W
Bledsoe County



DIVISION OF LABORATORY SERVICES

Nashville Central Laboratory
Kara Levinson, PhD, MPH, D(ABMM), Director
630 Hart Lane
Nashville, TN 37216
615-262-6300

Sent To:

Lab ID: N2506286

Nashville Central Laboratory

Bill To Client:

TDEC-DWR



TDEC-DWR.N2506286.G

This is to certify that the following results were determined using
good laboratory practices and in accordance with federal or state
approved methodologies.

Processing Date:

7/2/2025

Preliminary Report

Report Queue #:

0

Results on this report should only be considered preliminary, and the lab should be contacted for Actual Final Results.

Preliminary Report

Report Queue #:
0

Results on this report should only be considered preliminary, and the lab should be contacted for Actual Final Results.

Lab Sample #: N2506286-01
External Id #: EWV06232025
Sample Point Name: TN0025054

Project ID: TNPR0022
Sample Matrix: Water
Date/Time Collected: 06/23/2025 10:22
Sample Project ID: TNPR0022
Project Site No.:
County: Bledsoe - 04
Sample Type: Sample-Routine

Sampler's Name: Elias Vaden
Sampling Client: TDEC-DWR
Sampling Agency: Chattanooga EFO
Agency Invoiced: TDEC-DWR
Billing Code: EN00020463
Date/time Received: 06/24/2025 09:45
Logged By: Patrick Burnett
Report Date: 7/2/2025

TEST:	Total Phosphorus	METHOD:	365.1
PERFORMING LAB:	Nashville Central Laboratory		

ANALYTE	RESULT	UNITS	Qualifier	MDL	MQL	ANALYZED DATE
Phosphorus	PENDING	mg/L				12/31/-4714 00:00

TEST:	Total Kjeldahl Nitrogen	METHOD:	351.2
PERFORMING LAB:	Nashville Central Laboratory		

ANALYTE	RESULT	UNITS	Qualifier	MDL	MQL	ANALYZED DATE
Total Kjeldahl Nitrogen	PENDING	mg/L				12/31/-4714 00:00

TEST:	Residue, Settleable	METHOD:	2540-F
PERFORMING LAB:	Nashville Central Laboratory		

ANALYTE	RESULT	UNITS	Qualifier	MDL	MQL	ANALYZED DATE
Settleable Solids	<0.200	mL/L	U	0.200	0.200	06/24/2025 11:07

Preliminary Report

Report Queue #:
0

Results on this report should only be considered preliminary, and the lab should be contacted for Actual Final Results.

Lab Sample #: N2506286-02A
External Id #: EWV06182025
Sample Point Name: TN0025054

Project ID:	TNPR0022	Sampler's Name:	Elias Vaden
Sample Matrix:	Water	Sampling Client:	TDEC-DWR
Date/Time Collected:	06/18/2025 10:56	Sampling Agency:	Chattanooga EFO
Sample Project ID:	TNPR0022	Agency Invoiced:	TDEC-DWR
Project Site No.:		Billing Code:	
County:	Bledsoe - 04	Date/time Received:	06/24/2025 09:45
Sample Type:	Sample-Routine	Logged By:	Patrick Burnett
		Report Date:	7/2/2025

TEST: Ammonia		METHOD: 350.1				
PERFORMING LAB: Nashville Central Laboratory						
ANALYTE	RESULT	UNITS	Qualifier	MDL	MQL	ANALYZED DATE
Ammonia	16.7	mg/L	D	0.180	0.500	06/27/2025 13:59

Qualifiers Key

<u>Qualifier</u>	<u>Description</u>
MDL	Method Detection Limit
MLQ	Method Quantitation Limit
D	Dilution required.
U	Result is less than the MDL/LOD