JOHN COOPER MAYOR

METROPOLITAN GOVERNMENT



DEPARTMENT OF WATER AND SEWERAGE SERVICES ENGINEERING DIVISION 1600 SECOND AVENUE NORTH NASHVILLE, TENNESSEE 37208

January 27, 2020

Chief, Environmental Enforcement Section Environmental and Natural Resources Division U. S. Department of Justice Post Office Box 7611 Washington, D. C. 20044-7611

United States Attorney Middle District of Tennessee 110 Ninth Avenue, South, Suite A961 Nashville, TN 37203

Chief, Water Programs Enforcement Branch
Water Management Division
U. S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 30303

Mr. Barry Turner, Deputy Attorney General Office of the Tennessee Attorney General Environmental Division P. O. Box 20207 Nashville, TN 37202

Mr. Patrick Parker, Assistant General Counsel Tennessee Department of Environment and Conservation Division of Water Resources William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 2nd Floor Nashville, TN 37243

Re: DOJ Case No. 90-5-1-1-09000 Submittal of Annual Progress Report and Quarterly Progress Report

Gentlemen and Madam:

In accordance with the provisions of the Consent Decree, Section XIX (Reporting Requirements), Subsection B, herewith we are transmitting the 2019 Annual Report, which covers the time period from January 1, 2019 through December 31, 2019.



If you need assistance or an accommodation, please contact Metro Water Services, at 615-862-4862, 1600 Second Avenue North, Nashville, Tennessee 37208.

In addition, in accordance with the provisions of the Consent Decree, Section XIX (Reporting Requirements), Subsection A, herewith we are transmitting the Quarterly Progress report which covers the time period from October 1, 2019 through December 31, 2019.

A copy of each of these reports is concurrently being placed in the Public Document Repository (PDR).

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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions concerning this report please contact me.

Sincerely,

Scott A. Potter, P.E. Director

Ron C. Taylor, P.E. Overflow Abatement Program Director Engineering Division

Cc: Mr. David Tucker, Assistant Director, Operations
 Mr. Cyrus Q. Toosi, P.E., Assistant Director / Chief Engineer, Engineering
 Mr. Gregory A. Ballard, P.E., Engineer 3
 Mr. Thomas G. Cross, Associate Director, Metropolitan Department of Law

Metropolitan Government of Nashville and Davidson County Department of Water and Sewerage Services

Clean Water Nashville Overflow Abatement Program

CONSENT DECREE QUARTERLY PROGRESS REPORT

October 1 through December 31, 2019

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 am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Ron C. Taylor, P.E., Program Director





Table of Contents

Section 1	Introduction	1-1
1.1	Additional Programs	1-1
1.2	Report Organization	1-2
Section 2	Corrective Action Plan/Engineering Report	2-1
2.1	Completed CAP/ER Projects	2-1
2.2	CAP/ER Projects under Construction	2-3
2.3	CAP/ER Projects under Design	
2.4	Upcoming CAP/ER Projects	2-4
2.5	CAP/ER Addendum #2 Projects	2-5
Section 3	Long Term Control Plan	3-1
3.1	Completed LTCP Projects	
3.2	LTCP Projects under Construction	
3.3	LTCP Projects under Design and Preconstruction	
3.4	Upcoming LTCP Projects	3-3
Section 4	Additional Measures to Maintain Consent Decree Compliance	4-1
4.1	2017 Annual Rehabilitation – Dry Creek	
4.2	2017 Annual Rehabilitation – Shepherd Hills	4-1
Section 5	Quarterly SSO and Dry-Weather CSO Report	5-1

List of Tables

Table 5-1 Quarterly SSO Re	port5·	-2

Appendix

Appendix A Schedule for Current and Upcoming Projects



Introduction

On March 12, 2009, the Metropolitan Government of Nashville and Davidson County, Tennessee (Metro), entered into a Consent Decree with the United States and the State of Tennessee. To fulfill the reporting requirements defined in Section XIX.A. of the Consent Decree, Metro has prepared this *Quarterly Progress Report*, which includes the following information:

- 1. Information on sanitary sewer overflows (SSOs) and dry-weather combined sewer system overflows (CSOs) occurring during the reporting period
- 2. A description of the work conducted during the reporting period to comply with the requirements of the Consent Decree
- 3. The anticipated work for the upcoming quarter to comply with the requirements of the Consent Decree
- 4. Any additional information necessary to demonstrate that Metro is adequately implementing the work

Work, as defined in the Consent Decree, includes all activities that Metro is required to perform under the Consent Decree. For the purposes of this *Quarterly Progress Report*, however, the focus will remain on current and upcoming work related to the *Corrective Action Plan/Engineering Report* (CAP/ER), the *Long Term Control Plan* (LTCP), and additional activities to address SSOs and CSOs.

1.1 Additional Programs

Several additional programs, listed below, were also required to be developed or implemented as part of the Consent Decree. Any modifications or updates to these programs will be identified in **Section 4** of this report.

- Spill and Overflow Response Plan (Section VII.C.2) Metro continues to operate under the current Spill and Overflow Response Plan (SORP). A review of the SORP will be conducted annually with any proposed changes submitted to the U.S. Environmental Protection Agency (EPA) for review and approval by June 1 each year.
- Inter-jurisdictional Agreement Program (Section VII.C.3) All required inter-jurisdictional agreements are in place, and Metro will continue to operate under these agreements, including monitoring peak flows received.
- Capacity Assurance Plan (Section VII.C.4) The Capacity Assurance Plan will continue to be applied as a tracking/approval tool for new development/flow in the sanitary sewer system (SSS).
- Pump Station Operation Plan for Power Outages (Section VII.C.5) All projects identified in the Pump Station Operation Plan for Power Outages were completed prior to the start of the reporting period.



- *Nine Minimum Controls Compliance Plan* (Section VII.D.1) All elements of the Nine Minimum Controls Compliance Plan (NMC) were completed in 2012.
- Supplemental Environmental Projects (Section VIII) The Supplemental Environmental Projects (SEPs) required in the Consent Decree were completed in 2010.

1.2 Report Organization

This *Quarterly Progress Report* is organized as follows:

Section 1 – Introduction

Section 2 – Corrective Action Plan/Engineering Report

Section 3 – Long Term Control Plan

Section 4 - Additional Measures to Maintain Consent Decree Compliance

Section 5 – Quarterly SSO and Dry-Weather CSO Report



Corrective Action Plan/Engineering Report

To address conditions causing overflows in their sanitary sewer system, Metro developed a CAP/ER that was submitted to EPA and the Tennessee Department of Environment and Conservation (TDEC) on September 11, 2011.

The CAP/ER development began with a characterization of Metro's sanitary sewer system through extensive monitoring and modeling to understand the existing system's limitations. The need for improvements to address both current and future sewer capacity needs was then assessed, and potential alternatives were evaluated to select efficient and cost effective solutions. These recommended projects, which include infrastructure rehabilitation, additional conveyance capacity, and storage of wet-weather flows, are presented in the CAP/ER.

Approval of the CAP/ER was granted by EPA on August 10, 2017, with TDEC copied on the approval. Since submittal of the CAP/ER in 2011, information from additional flow monitoring data collection, constructability reviews, and hydraulic analyses has resulted in adjustments to several CAP/ER projects, as well as the identification of additional projects to remediate SSOs. A summary of those changes was presented to EPA and TDEC in the *Addendum to the CAP/ER*, dated September 27, 2017.

Through ongoing efforts to maintain the system, Metro identified several overflow locations, outside of those identified in the CAP/ER, that warrant additional field investigations and/or improvements. As requested by TDEC in a letter dated July 15, 2019, Metro prepared *Addendum #2 to the CAP/ER*, which was submitted on August 30, 2019. That Addendum describes those overflow locations, summarizes actions taken, and presents Metro's plan for identifying and addressing conditions causing those overflows.

On-going CAP/ER projects are described in the following subsections, and a schedule illustrating current and upcoming work on CAP/ER projects is presented as Appendix A.

2.1 Completed CAP/ER Projects

The following projects, discussed in the CAP/ER, achieved substantial completion prior to the start of the reporting period:

- 28th Avenue Rehabilitation Area 1 Clifton Avenue
- Barker Road / Omohundro Equalization Storage Phase I
- Brick Church Pike Pipe Improvements
- Cowan / Riverside Rehabilitation Area 1 Jones Avenue
- Cowan / Riverside Rehabilitation Area 2 Dickerson Pike
- Cowan / Riverside Rehabilitation Area 3 West Trinity Lane
- Cowan / Riverside Rehabilitation Area 4 Pages Branch



- Davidson and Brook Hollow Sewer Improvements
- Dodson Chapel Equalization Tank and Wastewater Pumping Station Expansion
- Dodson Chapel Pipe Improvements
- Dry Creek Wastewater Treatment Plant Optimization
- Ewing Creek / Brick Church Equalization Facility
- Gibson Creek Rehabilitation Area 1 Dupont Avenue
- Hidden Acres Rehabilitation
- Highway 100 / Tyne Boulevard Trimble Rehabilitation
- Holiday Travel Park Gravity Conversion
- Joelton Rehabilitation
- Lakewood Water and Sewer Replacement
- Langford Farms Madison Heights Rehabilitation
- Loves Branch Rehabilitation
- Mill Creek 36-inch Trunk Sewer System Rehabilitation
- Mill Creek / Opryland Equalization Facility Phase II
- Neely's Bend Rehabilitation
- Rockwood Conveyance Improvements
- Shelby Park Rehabilitation Area 1 Virginia Avenue
- Shelby Park Rehabilitation Area 2 Norvel Avenue
- Shelby Park Rehabilitation Area 3 Greenland Avenue
- Shelby Park Rehabilitation Area 4 Brush Hill Road
- Shelby Park Rehabilitation Area 5 Cooper Lane
- Smith Springs Equalization Storage
- Smith Springs Rehabilitation Area 1 Priest Lake Meadows
- Smith Springs Rehabilitation Area 2 Castlegate
- West Park Equalization Storage Phase I
- West Park Equalization Facility Phase II
- Westchester Drive Rehabilitation



- Whites Creek Wastewater Pumping Station
- Whites Creek Wastewater Treatment Plant (WWTP) Optimization and Disinfection

2.2 CAP/ER Projects under Construction

The following projects, discussed in the CAP/ER, were under construction during the reporting period:

Vandiver Rehabilitation

The Vandiver Pump Station Upgrades project, as presented in the CAP/ER, consisted of expanding the pumping capacity of the Vandiver Pump Station to 11 million gallons per day to address overflows and surcharging in the existing system. Additional analysis of the flow monitoring and condition assessment data of the upstream gravity system indicated that rehabilitation to reduce wet-weather flows may provide a viable option to reduce the required increase in pumping capacity. Because of this, the Vandiver Pump Station Upgrades project has been delayed allowing for the completion of the Vandiver Rehabilitation project and evaluation of the project's impact.

The project area evaluated for rehabilitation included more than 55,000 linear feet of gravity sewer. The resulting project, as advertised for construction, consists of the rehabilitation of approximately 30,650 linear feet of 6- to 21-inch diameter gravity sewer, the rehabilitation of associated manholes, and the renewal of approximately 570 services using cured-in-place pipe lining or open-cut techniques.

Design began on December 14, 2016, and was completed in July 2017. This project was packaged with the Hidden Acres Rehabilitation project for bidding, although construction activities for the two projects follow different schedules. Advertisement for construction activities began on November 2, 2017, and bid proposals were received on November 29, 2017. Construction activities began on March 26, 2018, and were substantially complete on November 6, 2019.

2.3 CAP/ER Projects under Design

The following projects, discussed in the CAP/ER, were under design or bidding during the reporting period:

Davidson Branch Pump Station and Equalization Facility

The Davidson Branch Pump Station and Equalization Facility project, referred to as the Davidson Branch Equalization Storage project in the CAP/ER, includes the relocation of an existing duty station and construction of a wastewater storage tank and wet-weather pumping station on a property adjacent to the existing Davidson Branch Pump Station. Design began on May 1, 2015, and is complete. Advertisement for construction is anticipated to occur in the second quarter of 2020.

Hurricane Creek Pipe Improvements

The Hurricane Creek Pipe Improvements project, as presented in the CAP/ER, consisted of increasing the conveyance capacity of approximately 7,800 linear feet of gravity sewer to meet



Metro's capacity assurance requirements. Following the analysis of additional flow monitoring conducted in the spring of 2015, the project's scope was revised to include the design of parallel and/or replacement gravity sewers for approximately 12,100 linear feet of existing trunk sewer. Design began on July 12, 2016, and is complete. Permit and easement acquisition activities are underway and are anticipated to continue through the upcoming quarter.

Gibson Creek Equalization Facility

The Gibson Creek Equalization Facility project, as presented in the CAP/ER, consists of the design and construction of a 10 million gallon wastewater storage tank and associated wet-weather pumping station. Land acquisition activities were completed during the reporting period. Design began on September 12, 2016, and is complete. Permitting activities are underway and are anticipated to continue through the upcoming quarter. Advertisement for construction is anticipated to occur in the third quarter of 2020.

Sevenmile Creek Rehabilitation – Area 1

The Sevenmile Creek Rehabilitation – Area 1 project is the first in a series of rehabilitation projects developed for the Mill Creek watershed and its tributaries. Although not originally included in the projects proposed in the CAP/ER, sewer rehabilitation in the Mill Creek watershed will be performed to reduce wet-weather flows, allowing for a reduced length of conveyance improvements for the Mill Creek Trunk Improvements and Equalization Facility project. The project area to be evaluated for rehabilitation includes approximately 41,200 linear feet of gravity sewer. Design began on July 31, 2018, and is complete. Advertisement for construction is anticipated to occur in the third quarter of 2020.

Shelby Park Rehabilitation – Area 6 – Shelby Trunk

This rehabilitation project is the sixth in a series of rehabilitation projects to be conducted upstream of the Shelby Park Pump Station. The area to be evaluated for rehabilitation includes approximately 36,200 linear feet of gravity trunk sewer and 130 manholes. Design began on February 6, 2017, and is complete, including coordination with Metro Parks. Permitting activities were completed in December 2017. Advertisement for construction is anticipated to occur in the second quarter of 2020, pending receipt of a State Revolving Fund (SRF) loan.

Smith Springs Rehabilitation – Area 3 – Harbour Town

The Smith Springs Rehabilitation – Area 3 – Harbour Town project is the third of multiple rehabilitation projects that will be conducted upstream of the Smith Springs Pump Station. The project area to be evaluated for rehabilitation includes over 60,000 linear feet of gravity sewer. Design began on June 5, 2017, and is complete. Advertisement for construction is anticipated to occur in the second quarter of 2020, pending receipt of an SRF loan.

2.4 Upcoming CAP/ER Projects

The following projects, discussed in the CAP/ER, are anticipated to begin procurement for design services during the upcoming quarter:



Mill Creek Trunk Improvements and Equalization Facility

The Mill Creek Trunk Improvements and Equalization Facility project combines two projects presented in the CAP/ER, the Mill Creek Trunk Improvements project and the Mill Creek / Opryland Equalization Facility – Phase III project. Additional analysis of the flow monitoring and condition assessment data of the upstream gravity system indicated that rehabilitation to reduce wet-weather flows may provide a viable option to reduce the extents of the trunk sewer improvements. The resulting project consists of conveyance capacity upgrades of over 3 miles of large diameter sewer, 60 million gallons of additional storage, and a wet-weather pump station with a 100 million gallons per day pumping capacity. Initial activities associated with the procurement of design services were initiated in the reporting period, and the project is anticipated to be advertised for design in the first quarter of 2020.

Additionally, Metro intends to deliver this project via a Construction Manager at Risk who will provide pre-construction services during the design phase and act as the general contractor during the construction phase of this project. Procurement of the Construction Manager at Risk is also anticipated to begin in the first quarter of 2020.

• 28th Avenue Rehabilitation – Area 2 – Batavia Street

The 28th Avenue Rehabilitation – Area 2 – Batavia Street project is the second in a series of rehabilitation projects to be conducted in the 28th Avenue Rehabilitation project area. The area to be evaluated for rehabilitation includes approximately 49,500 linear feet of gravity sewer and 272 manholes. Procurement of design services is anticipated to begin in the upcoming quarter.

Cleeces Ferry Rehabilitation – Area 1 – Summerly Drive

The Cleeces Ferry Rehabilitation – Area 1 – Summerly Drive project is the first of two rehabilitation projects to be conducted upstream of the Cleeces Ferry Pump Station. The area to be evaluated for rehabilitation includes approximately 53,100 linear feet of gravity sewer and 299 manholes. Procurement of design services is anticipated to begin late in the upcoming quarter.

In addition to the projects listed above, Metro continues to conduct planning activities for multiple Clean Water Nashville projects, including collecting sewer condition assessment data.

2.5 CAP/ER Addendum #2 Projects

As discussed in the *Addendum #2 to the CAP/ER*, Metro recognizes the need to continuously review occurrences of overflows, identify their root causes, and address issues before they become chronic. Through that monitoring process, Metro identified several overflow locations, outside of those initially identified in the CAP/ER, that warrant additional field investigations and/or improvements. Activities associated with those locations, when not associated with a capital project, are described as follows:

Bordeaux Hills Pump Station

After experiencing an increased frequency of overflows in 2018, the operation of the Bordeaux Hills Pump Station was evaluated, and it was determined that the grinders at the station were potentially causing excessive surcharging during high flow storm events leading to an overflow



at the relief pipe. In March 2019, the grinders were removed, and the station has not experienced an overflow since that time. Metro continues to monitor the station's performance without the grinders, while continuing evaluation of the upstream gravity sewer system for potential repairs to mitigate the overflow.

Bordeaux Hospital Pump Station

To address the wet-weather overflow occurring at the Bordeaux Hospital Pump Station, the pump impellers were replaced in June 2019, restoring the capacity of the pump station. Although it is believed that this has solved the issue, the station's performance will continue to be monitored. If overflows continue, additional investigations and remedial activities will be conducted.

Fairway Center Pump Station

Because of recent overflows at the Fairway Center Pump Station during wet-weather events, Metro identified the area for additional investigation. An evaluation of the pump station's performance has been completed, and pump impellers were replaced which improved the station's performance. Smoke testing of the gravity sewer upstream of the station was also completed during the reporting period. Review of smoke testing data and available closed-circuit television (CCTV) inspection of the gravity sewer is anticipated to be completed by mid-2020.

Farmingham Woods Pump Station

The Farmingham Woods Pump Station was removed from service in July 2019, and the area previously served by the station is now conveyed via a new gravity sewer. This improvement addresses the wet-weather overflows previously observed at the station.

Hillview Pump Station

Although not historically a location of overflows, numerous wet-weather overflows were observed at the Hillview Pump Station beginning in late 2017. In response to these overflows, smoke testing was conducted in the upstream gravity sewer in October 2018, and manhole inspections along with CCTV inspections of the gravity sewer were conducted in March 2019. Several repairs to address rainfall-derived infiltration and inflow (RDII) were identified, and these were completed in 2019. Concurrently with the investigations of the gravity sewer, the pump station was evaluated and determined to have a reduced pumping capacity. Work to restore the station's capacity has been completed, and the station will continue to be monitored for capacity issues.

Hopedale Pump Station

Although it experienced only one overflow in the decade prior to 2019, there have been three reported overflows at the Hopedale Pump Station through the first half of 2019. Because of the increased frequency of overflows, the station's performance was evaluated, and the station has been determined to be operating as designed. Smoke testing of the gravity sewer upstream of the station was completed during the reporting period, and data collected is being reviewed. Additional investigations to identify and address sources of RDII, such as CCTV inspection of the gravity sewer, may be conducted if issues persist at the station.



Long Hunter Chase Pump Station

Following an increase in the frequency of wet-weather overflows associated with the Long Hunter Chase Pump Station in 2018, smoke testing was conducted in the upstream gravity sewer in October 2018. Smoke testing revealed that many cleanouts in the area were broken, allowing inflow to enter the system during rainfall events. Those cleanouts are scheduled to be repaired in 2020.

Mill Creek Pump Station

Because of the increased frequency of overflows in 2018 at the Mill Creek Pump Station, smoke testing of the gravity sewer upstream of the station was conducted in the fall of 2019. Investigations in the area identified that the overflow relief pipe associated with the station was broken, potentially allowing water to enter the sewer during periods of high river stage. That and other defects identified through smoke testing will be repaired, as needed during 2020, and the station's performance will continue to be monitored.

Rowan Drive/Cravath Drive

The Rowan Drive / Cravath Drive area, located in the northern portion of the Whites Creek WWTP service area, has experienced numerous rainfall-related overflows. Flow monitoring conducted in 2018 indicated that surcharging in the Rowan / Cravath area is not caused by surcharging in the trunk sewer along Whites Creek. Instead the overflows appear to be caused by either a capacity issue within the local gravity sewer or an excessive amount of RDII entering the system. Metro has installed a level sensor in the area to assess the frequency and extent of surcharging. CCTV inspection of the 10-inch gravity sewer was completed in the summer of 2019, and a review of the data confirmed that the sewer is free of major blockages and significant sources of infiltration. Additional temporary flow monitoring is planned for winter/spring of 2020. Following that effort, additional analyses utilizing the hydraulic model will be conducted to confirm that the available capacity is adequate to convey the predicted peak flows in this area and to assess whether the area should be targeted for rehabilitation.

South Oak Hill Pump Station

Because of the increased frequency of overflows at the South Oak Hill Pump Station during wet-weather events, Metro has identified the area for additional investigation. An evaluation of the pump station's performance has been completed, and the station has been determined to be operating as designed. Smoke testing of the gravity sewer system upstream of the station was completed during the reporting period. Defects identified through those investigations will be repaired, as needed.

Sunliner Drive Pump Station

Because of the increased frequency of overflows at the Sunliner Pump Station during wet-weather events, Metro has identified the area for additional investigation. An evaluation of the pump station's performance has been completed, the pump impellers were replaced, and the force main is scheduled for cleaning in 2020. Smoke testing of the gravity sewer system upstream of the station was completed during the reporting periods. Defects identified through those investigations will be repaired, as needed.



• Wallace Lane / Abbott Martin Road

The Wallace Lane / Abbott Martin Road area is located in Green Hills and is part of the Whites Creek WWTP service area. In early 2019, a customer notified Metro of a potential issue in this area, and Metro has since confirmed that overflows occur at two manholes (116-12-076 and 116-16-040) during wet-weather events. Since notification of the issue, Metro has verified that the sewers in the immediate area are structurally sound and free of blockages that may reduce the sewer's capacity during high flow events. Metro currently has level sensors installed in the area to assess the frequency and extent of surcharging, and additional temporary flow monitoring is planned for winter/spring of 2020. This data will confirm the feasibility of redirecting additional flow from the 8-inch diameter sewer (where the overflows occur) to the parallel 10-inch diameter sewer running along Wallace Lane. If that is not feasible, or does not fully address the overflow, additional field investigation and rehabilitation to address the sources of RDII in the area upstream of the overflows will be conducted.



Long Term Control Plan

To reduce the occurrence and impact of combined sewer overflows into the Cumberland River, Metro developed an update to the *Long Term Control Plan* (LTCP), that was submitted to EPA and TDEC on September 11, 2011.

The LTCP followed EPA's *Combined Sewer Overflow Control Policy* in implementing a rigorous process for identifying and evaluating alternatives to reduce combined sewer overflows. Consideration included financial and engineering analyses to develop recommended improvements in conjunction with four key objectives that were established early in the planning process:

- Improve the water quality of the Cumberland River by reducing impacts from combined sewer overflows
- Provide a level of CSO control that results in improvements in water quality that are consistent with the community's use of the Cumberland River
- Align investment in CSO controls to be commensurate with the contribution of CSOs to water quality relative to other sources
- Consider the impact of the overall program cost on the ratepayers in the current economic climate

These goals and objectives were developed based on feedback provided by representatives from Metro, local government, and the community through a public engagement campaign developed to solicit input from affected stakeholders.

On June 18, 2018, Metro presented to EPA and TDEC an *Addendum to the LTCP* which summarizes the updates and modifications to projects described in the LTCP since its submittal in 2011.

In a February 11, 2019, letter, EPA provided review comments to Metro on the LTCP and *Addendum to the LTCP*. Metro's letter in response, dated March 6, 2019, proposes the following path forward:

- Implement the recommended improvements at the Central WWTP identified in the *Basis of Design Report*
- Implement the selected control measures at the Driftwood and Boscobel CSO outfalls
- Submit a revised LTCP within twelve months after TDEC finalizes their revised water quality standards
- Implement the remedial measures identified in the revised LTCP within five years after approval or modification of the revised LTCP, provided the remaining costs do not exceed \$200 million

Discussions about the LTCP are expected to continue through the upcoming quarter.



As review of the LTCP continues, Metro continues to move forward with the implementation of portions of the LTCP. Active projects are described in the following subsections, and a schedule illustrating current and upcoming work on LTCP projects is presented as Appendix A.

3.1 Completed LTCP Projects

The following projects, discussed in the LTCP, were completed prior to the start of the reporting period:

- Apex Sewer Corrections
- Broadway Improvements
- Driftwood Equalization Basin Expansion
- Sludge Transfer Facility (as part of Central WWTP Capacity Improvements and CSO Reduction)
- Van Buren Improvements
- Washington CSO Facility Improvements

3.2 LTCP Projects under Construction

There are currently no LTCP projects under construction.

3.3 LTCP Projects under Design and Preconstruction

The following project, discussed in the LTCP, is anticipated to continue design services during the upcoming quarter:

Central WWTP Capacity Improvements and CSO Reduction, A and B

The Central WWTP Capacity Improvements and CSO Reduction project will reduce the overflow frequency and volume from the Kerrigan CSO by increasing both the wet-weather treatment capacity of the Central WWTP and the overall capacity of the Central Pumping Station. The project will also add on-site CSO storage and equalization to assist in managing the dramatic flow rate increases from the combined sewer system during intense rainfall events. This project is the result of the *Central Wastewater Treatment Plant Optimization Study* which was completed in 2014. The study identified limiting factors in each of the Central WWTP's unit processes and confirmed that peak wet-weather secondary treatment capacity could be significantly increased through upgrades to the existing headworks, secondary aeration, final clarification systems, and other facilities without building new tankage. As such, this project replaces the following projects presented in the LTCP:

- CWWTP Optimization and EQ Conversion
- CWWTP EQ Addition Phase 1
- CWWTP Pumps / EQ Grit Equipment
- CWWTP EQ Addition Phase 2
- CWWTP EQ Addition Phase 3



Advertisement for design services for the Central WWTP Capacity Improvements and CSO Reduction project began in January 2015, and two design contracts (A and B) were awarded in April 2015. Following contract negotiations and other designer procurement activities, design activities for both contracts began on September 21, 2015. The *Basis of Design Report* was finalized in December 2016.

In mid-2017, Metro officially decided to design and construct a single headworks facility that will serve both combined and sanitary influents. This design has been completed by Hazen and Sawyer. The majority of other work at the plant is being designed by Brown and Caldwell. Each firm's notice-to-proceed for detailed design was issued on June 23, 2017. Design for the headworks reached 100 percent in June 2019. Design activities for the remainder of the plant are underway and are anticipated to be complete in the upcoming quarter.

On March 23, 2017, Metro completed the procurement and contracting of a Construction Manager at Risk to provide pre-construction services during the design phase and to act as the general contractor during the construction phase of this project. Brasfield & Gorrie was selected as the Construction Manager at Risk. Through the reporting period, the Construction Manager at Risk provided input on design efforts, continued to analyze the construction schedule to determine critical path items, and refined construction cost estimates. It is anticipated that Brasfield & Gorrie will begin procurement for the headworks package with prequalified firms in the upcoming quarter.

3.4 Upcoming LTCP Projects

There are currently no LTCP projects anticipated to begin design in the upcoming quarter.



Additional Measures to Maintain Consent Decree Compliance

In addition to the CAP/ER and LTCP projects described in the previous sections, the measures described in the following subsections are related to Metro's on-going Consent Decree compliance.

4.1 2017 Annual Rehabilitation – Dry Creek

The 2017 Annual Rehabilitation – Dry Creek project, which is located in the Dry Creek WWTP's service area, consists of the evaluation and rehabilitation of approximately 57,900 linear feet of gravity sewer, ranging in diameter from 8 to 30 inches. These sewers are located outside of CAP/ER rehabilitation areas and include many sewers classified as high priority for evaluation due to observations of infiltration. Design began on March 27, 2017, and was completed in September 2017. Advertisement for construction is anticipated to occur in the fourth quarter of 2020, pending receipt of an SRF loan.

4.2 2017 Annual Rehabilitation – Shepherd Hills

The 2017 Annual Rehabilitation – Shepherd Hills project, which is located in the Dry Creek WWTP's service area, consists of approximately 59,900 linear feet of gravity sewer, ranging in diameter from 8 to 30 inches. This project targets sewers located outside of CAP/ER rehabilitation areas and includes many sewers classified as high priority for evaluation due to observations of infiltration. Design began on May 30, 2017, and was completed in October 2017. Advertisement for construction is anticipated to occur in the third quarter of 2020, pending receipt of an SRF loan.



Quarterly SSO and Dry-Weather CSO Report

During the reporting period, Metro experienced 91 SSOs, as listed in **Table 5-1**.

No dry-weather CSOs occurred during the reporting period.



Table 5-1 Quarterly SSO Report

					Quarterly SSO	Report				
				Octobe	er 1 through Dec	ember 31, 2	2019			
Event Start Date	Event End Date	Rainfall (inches)	Duration (hours)	Overflow Volume (MG)	Overflow Cause	Location Manhole ID	Location	Unpermitted Discharge	Building Backup	
04-Oct-19	04-Oct-19	0	2.50	0.0001	Blockage	10612019	895 Murfreesboro Pk	Yes	No	
05-Oct-19	05-Oct-19	0	6.00	0.0001	Air Relief Valve	07008054	832 Youngs Ln	No	No	
07-Oct-19	07-Oct-19	3.51	0.33	0.009	Rainfall	04312004	Vandiver SPS	Yes	No	
07-Oct-19	07-Oct-19	4.13	5.00	0.02	Rainfall	01416001	Joelton SPS	Yes	No	
07-Oct-19	07-Oct-19	3.07	2.50	0.072	Rainfall	10210012	Davidson Branch SPS	Yes	No	
07-Oct-19	07-Oct-19	3.18	1.25	0.115	Rainfall	05116016	Loves Branch SPS	Yes	No	
07-Oct-19	07-Oct-19	3.18	2.50	0.2	Controller	05204009	River Retreat SPS	Yes	No	
07-Oct-19	07-Oct-19	3.44	3.67	0.397	Overflow CauseLocation Manhole IDLocationUnper DiscBlockage10612019895 Murfreesboro PkYAir Relief Valve07008054832 Youngs LnMRainfall04312004Vandiver SPSYRainfall01416001Joelton SPSYRainfall01416001Joelton SPSYRainfall05116016Loves Branch SPSYRainfall05116016Loves Branch SPSYRainfall0910402528th Ave SPS / Centennial BlvdYBlockage12915024255 Cana CirMBlockage07109059301 Great Circle RdMBlockage161020015007 Meta DrYBlockage160040175242 Trousdale DrYBlockage160040175242 Trousdale DrYBlockage160040175243 Trousdale DrMBlockage160040175243 Trousdale DrMPorce Main145120035063 Lakeview DrMRainfall10210012Davidson Branch SPSYBlockage16407007216 Grovedale TraceYBlockage10402034211 31st Ave NYPorce Main00216001101 East End RdMRainfall10210012Davidson Branch SPSYRainfall00216001101 East End RdM		Yes	No		
08-Oct-19	08-Oct-19	0	2.00	0.001	Blockage	12915024	255 Cana Cir	No	No	
11-Oct-19	12-Oct-19	0.63	5.00	0.00001	Blockage	07109059	301 Great Circle Rd	No	No	
14-Oct-19	14-Oct-19	0	1.00	0.00001	Blockage	WLS052F024	4845 Catskill Dr	No	No	
14-Oct-19	14-Oct-19	0	5.00	0.001	Blockage	16102001	5007 Meta Dr	Yes	No	
17-Oct-19	18-Oct-19	0	14.00	0.001	Blockage	16004017	5242 Trousdale Dr	Yes	No	
24-Oct-19	25-Oct-19	0.71	24.00	0.001	Blockage	18003020	6716 Holt Rd	Yes	No	
25-Oct-19	26-Oct-19	2.04	4.00	0.0001	Force Main	14512003	5063 Lakeview Dr	No	No	
26-Oct-19	26-Oct-19	1.75	8.50	0.391	Rainfall	10210012	Davidson Branch SPS	Yes	No	
27-Oct-19	27-Oct-19	0	3.00	0.0001	Blockage	16407007	216 Grovedale Trace	Yes	No	
28-Oct-19	28-Oct-19	0	1.00	0.001	Blockage	10402034	211 31st Ave N	Yes	No	
28-Oct-19	28-Oct-19	0.00	0.50	0.02	Other - Contractor	05415007	Brandywine Point SPS	Yes	No	
30-Oct-19	31-Oct-19	2.16	16.83	0.745	Rainfall	10210012	Davidson Branch SPS	Yes	No	
31-Oct-19	31-Oct-19	1.86	7.00	0.001	Force Main	00216001	101 East End Rd	No	No	
31-Oct-19	31-Oct-19	1.75	4.00	0.008	Rainfall	08410007	149 Barker Rd	Yes	No	
08-Nov-19	08-Nov-19	0	2.50	0.001	Blockage	14701047	321 Lynn Dr	No	No	
11-Nov-19	12-Nov-19	0.41	24.00	0.001	Blockage	16413060	3820 Asheford Trace	Yes	No	
13-Nov-19	13-Nov-19	0	9.00	0.001	Blockage	16413056	3826 Asheford Trace	Yes	No	
18-Nov-19	18-Nov-19	0	2.00	0.0001	Blockage	16004025	5224 Trousdale Dr	Yes	No	
21-Nov-19	21-Nov-19	0	0.50	0.0001	0.2 Controller 03204003 Interfactors of a control of a contro					
22-Nov-19	22-Nov-19	1 35	2 50	0.00001	Blockage	09514012	1050 Acorn Dr	No	No	



	Quarterly SSO Report												
				Octobe	er 1 through De	cember 31, 2	2019						
Event Start Date	artEvent End DateRainfall (inches)Duration (hours) 0 1922-Nov-191.613.581922-Nov-191.5210.831924-Nov-191.652.001927-Nov-191.5417.501927-Nov-191.3217.001927-Nov-191.323.001927-Nov-191.323.001927-Nov-191.5017.001927-Nov-191.323.001927-Nov-191.5017.001927-Nov-191.5110.001927-Nov-191.5110.001901-Dec-191.1324.001901-Dec-192.084.501901-Dec-192.083.251901-Dec-191.1124.251901-Dec-191.134.001901-Dec-191.281901-Dec-191.663.751901-Dec-191907-Dec-1902.001001907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-1901907-Dec-190<		Overflow Volume (MG)	Overflow Cause	Location Manhole ID	Location	Unpermitted Discharge	Building Backup					
22-Nov-19	22-Nov-19	1.61	3.58	0.134	Rainfall	05116016	Loves Branch SPS	Yes	No				
22-Nov-19	22-Nov-19	1.52	10.83	0.821	Rainfall	10210012	Davidson Branch SPS	Yes	No				
24-Nov-19	24-Nov-19	1.65	2.00	0.0001	Blockage	12915024	255 Cana Dr	Yes	No				
26-Nov-19	27-Nov-19	1.54	17.50	1.252	Rainfall	10210012	Davidson Branch SPS	Yes	No				
27-Nov-19	27-Nov-19	1.50	17.00	0.001	Rainfall	11907146	431 E Thompson Ln	Yes	No				
27-Nov-19	27-Nov-19	1.32	17.00	0.001	Rainfall	Rainfall 09510050 501 Bismark Dr							
27-Nov-19	27-Nov-19	1.32	3.00	0.00001	Blockage	09206135	2821 Clifton Ave	No	No				
27-Nov-19	27-Nov-19	1.50	17.00	0.001	Rainfall	Rainfall 11909113 2803 Foster Ave							
27-Nov-19	27-Nov-19	1.71	7.75	0.05	Rainfall 01416001 Joelton SPS		Yes	No					
27-Nov-19	27-Nov-19	1.51	10.00	0.193	Rainfall	08410007	149 Barker Rd	Yes	No				
30-Nov-19	01-Dec-19	1.13	24.00	0.001	Rainfall	11907146	431 E Thompson Ln	Yes	No				
30-Nov-19	01-Dec-19	2.08	4.50	0.001	Rainfall	15016001	Mt. View SPS	Yes	No				
30-Nov-19	30-Nov-19	1.62	0.25	0.001	Rainfall	14704082	Hopedale SPS	Yes	No				
30-Nov-19	01-Dec-19	0.63	2.83	0.045	Rainfall	10210012	Davidson Branch SPS	Yes	No				
30-Nov-19	01-Dec-19	2.08	3.25	0.2	Rainfall	17609035	Hurricane Creek SPS	Yes	No				
30-Nov-19	01-Dec-19	1.11	24.25	1.4	Rainfall	16002032	South Oak Hill SPS	Yes	No				
01-Dec-19	01-Dec-19	1.13	4.00	0.001	Rainfall	11907049	716 Old Glenrose	Yes	No				
01-Dec-19	01-Dec-19	1.66	3.75	0.033	Rainfall	08410007	149 Barker Rd	Yes	No				
01-Dec-19	01-Dec-19	0.63	12.83	1.018	Rainfall	13609002	Smith Springs SPS	Yes	No				
04-Dec-19	04-Dec-19	0	4.00	0.00001	Blockage	10506045	1301 8th Ave S	Yes	No				
07-Dec-19	07-Dec-19	0	2.00	0.0001	Blockage	15010066	100 Stone Bridge Ct	Yes	No				
07-Dec-19	07-Dec-19	0	2.00	0.0001	Blockage	15010063	100 Stone Bridge Ct	Yes	No				
08-Dec-19	08-Dec-19	0	1.00	0.0001	Blockage	16006007	5248 Franklin Pike Cir	Yes	No				
11-Dec-19	11-Dec-19	0	4.50	0.0001	Blockage	WMN033P078	2304 Brookfield Dr	Yes	No				
12-Dec-19	12-Dec-19	0	4.00	0.00001	Blockage	07205047	1026 E Trinity Ln	No	No				
15-Dec-19	15-Dec-19	0.00	3.50	0.05	Air Relief Valve	06208003	Hidden Acres SPS	Yes	No				
16-Dec-19	16-Dec-19	1.48	2.50	0.01	Controller	WMN057A016	Baronswood SPS	Yes	No				
16-Dec-19	16-Dec-19	2.31	14.80	0.05	Rainfall	01416001	Joelton SPS	Yes	No				
16-Dec-19	17-Dec-19	1.71	16.00	0.1	Rainfall	11907146	431 E Thompson Ln	Yes	No				



	Quarterly SSO Report												
				Octobe	er 1 through De	cember 31, 2	019						
Event Start Date	Event End Date	Rainfall (inches)	Duration (hours)	Overflow Volume (MG)	Overflow Cause	Location Manhole ID	Location	Unpermitted Discharge	Building Backup				
16-Dec-19	17-Dec-19	1.87	17.17	0.268	Rainfall	08410007	149 Barker Rd	Yes	No				
16-Dec-19	17-Dec-19	1.22	15.17	0.84	Rainfall	10210012	Davidson Branch SPS	Yes	No				
16-Dec-19	18-Dec-19	1.87	43.00	1.3	Rainfall	09510050	501 Bismark Dr	Yes	No				
23-Dec-19	24-Dec-19	0	22.00	0.001	Blockage	08608149	2205 Willesden Green	No	No				
26-Dec-19	27-Dec-19	0	21.00	0.001	Blockage	WMN058A016	No	No					
28-Dec-19	28-Dec-19	0	3.00	0.03	Blockage	Blockage 16313003 5353 Cane Ridge Rd							
29-Dec-19	29-Dec-19	2.40	2.50	0.01	Rainfall	Rainfall 14704082 Hopedale SPS							
29-Dec-19	29-Dec-19	2.73	3.00	0.02	Rainfall	Rainfall 15016001 Mt. View SPS							
29-Dec-19	30-Dec-19	2.86	8.15	0.03	Rainfall	Rainfall 01416001 Joelton SPS			No				
29-Dec-19	30-Dec-19	2.61	4.00	0.05	Rainfall	Rainfall 16514001 Peppertree SPS		Yes	No				
29-Dec-19	30-Dec-19	2.14	6.00	0.06	Rainfall	Rainfall WLS053E058 Langford F		Yes	No				
29-Dec-19	29-Dec-19	2.08	3.83	0.061	Rainfall	09011002	516 Basswood Ave	Yes	No				
29-Dec-19	29-Dec-19	2.35	2.33	0.07	Rainfall	05116016	Loves Branch SPS	Yes	No				
29-Dec-19	30-Dec-19	2.73	8.75	0.1	Rainfall	15008009	Towne Village SPS	Yes	No				
29-Dec-19	30-Dec-19	2.73	12.15	0.1	Rainfall	15015008	Tillman SPS	Yes	No				
29-Dec-19	29-Dec-19	2.21	4.50	0.1	Rainfall	10203057	Cleeces Ferry SPS	Yes	No				
29-Dec-19	29-Dec-19	2.26	3.17	0.113	Rainfall	07114041	Cowan St SPS	Yes	No				
29-Dec-19	29-Dec-19	2.08	3.42	0.255	Rainfall	09105110	West Park SPS	Yes	No				
29-Dec-19	29-Dec-19	2.52	7.00	0.315	Rainfall	04312004	Vandiver SPS	Yes	No				
29-Dec-19	29-Dec-19	2.40	4.50	0.4	Rainfall	06208003	Hidden Acres SPS	Yes	No				
29-Dec-19	30-Dec-19	2.61	6.50	0.5	Rainfall	17609035	Hurricane Creek SPS	Yes	No				
29-Dec-19	30-Dec-19	2.19	10.00	0.6	Rainfall	16002032	South Oak Hill SPS	Yes	No				
29-Dec-19	30-Dec-19	2.74	7.25	0.802	Rainfall	09608006	McCrory Creek SPS	Yes	No				
29-Dec-19	30-Dec-19	2.70	15.00	0.962	Rainfall	13609002	Smith Springs SPS	Yes	No				
29-Dec-19	30-Dec-19	2.08	17.58	1.077	Rainfall	10210012	Davidson Branch SPS	Yes	No				
29-Dec-19	29-Dec-19	2.17	6.58	1.15	Rainfall	09104025	28th Ave SPS / Centennial Blvd	Yes	No				
29-Dec-19	30-Dec-19	2.35	7.83	1.383	Rainfall	05205001	Gibson Creek SPS	Yes	No				
29-Dec-19	01-Jan-20	2.74	58.67	5.133	Rainfall	08410007	149 Barker Rd	Yes	No				
30-Dec-19	31-Dec-19	2.52	15.00	0.0001	Rainfall	05315021	118 Riner Ct	Yes	No				



Quarterly SSO Report October 1 through December 31, 2019												
Event StartEvent End DateRainfall (inches)Duration (hours)		Overflow Volume (MG)	Overflow Cause Location Manhole ID		Location	Unpermitted Discharge	Building Backup					
30-Dec-19	31-Dec-19	2.34	26.00	0.001	Rainfall	11907147	0 Old Glenrose Ave	Yes	No			
30-Dec-19	30-Dec-19	2.34	2.50	0.001	Blockage	11706063	2164 Golf Club Ln	Yes	No			
30-Dec-19	31-Dec-19	2.34	26.00	0.1	Rainfall	11907146	431 E Thompson Ln	Yes	No			
30-Dec-19	31-Dec-19	2.34	26.00	0.15	Rainfall	11907049	765 Old Glenrose Ave	Yes	No			
30-Dec-19	02-Jan-20	2.78	72.00	2	Rainfall	09510050	501 Bismark	Yes	No			



Appendix A

Schedule for Current and Upcoming Projects





Page 1 of 2

Note: The construction activity is through substantial completion.	Nash 2019 Qu	ville Ov ıarterly	erflow A Progres	Abatem s Repoi	ent Pro rt - 4th	gram Quarter					
Activity Name.	20:	19				2020				2021	
Hurricane Creek Pine Improvements	Q1 Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	02	Q3	Q4
Design											
Permitting					P	ermitting			-+		
Fasement Acquisition					E	asement Acquisition	1				
Bid & Award								Bid 8	Award		
Construction											
Mill Creek Trunk Improvements and Equalization Facility											
Easement Acquisition											
Permitting											
Bid & Award											
Construction											
Sevenmile Creek Rehabilitation - Area 1											
	Design										
Permitting				Pe	ermitting						
Fasement Acquisition	Easement Acquisition				0						
Bid & Award								Bid & A	ward		
Construction											
Shelby Park Rebabilitation - Area 6 - Shelby Trunk											
Permitting											
Fasement Acquisition											
Bid & Award							Bid & Award				
Smith Springs Rehabilitation - Area 3 - Harbour Town											
Design											
Permitting											
Easement Acquisition											
Bid & Award							Bid & Awa	rd			
Construction											Constru
Vandiver Rehabilitation											
Design											
Easement Acquisition											
Permitting											
Bid & Award											
	1		:		1	1	1		1		