

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION Division of Water Resources

Nashville Environmental Field Office
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December 15, 2023

Mr. Brian Shelton | Public Utilities Senior Manager e-copy: brian.shelton@cityofclarksville.com Clarksville Gas & Water Dept. 2212 Madison Street Clarksville, TN 37043

RE: Sanitary Sewer Overflow Compliance Meeting Follow Up

Clarksville Combined Sewer System NPDES Permit # TN0020656 Montgomery County

Dear Mr. Shelton,

On November 22, 2023, Mr. Jordan Fey, and myself from the Division of Water Resources (Division) attended a requested meeting from you and your staff to review efforts made by the City of Clarksville's reduction of sanitary sewer overflows (SSO), specifically chronic SSOs as defined in Permit Section 2.3.3 – Overflow. I would like to thank you and your staff for the time, courtesy, and cooperation shown during the meeting.

As discussed in the meeting, the City is aware that no additional flows shall be added upstream of any single point in the collection system that experiences more than five SSOs and/or releases per calendar year or would otherwise overload any portion of the system. The current permit requires dry weather overflows, wet overflows, dry weather releases, and wet weather releases as events that would accumulate toward a chronic condition. The information presented demonstrate the City's extensive effort to reduce inflow and infiltration (I/I) and SSOs. The utilization of flow data and the geographical information system (GIS) interface demonstrated an effective program: the continued monitoring and addressing SSOs, and the collection system's capacity. The Division finds there is no need for Clarksville to impose connection moratoriums at this time. If new chronic SSOs locations should develop, the City should ensure it abides by the permit requirements to either implement a moratorium or require another meeting to justify a waiver not to implement one.

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I would like to again thank all of the Clarksville Gas and Water personnel for their courtesy and assistance during this meeting. If you have any questions or concerns regarding this letter, feel free to contact me at (615) 970-1222 or via e-mail at daniel.pleasant@tn.gov.

Sincerely,

Daniel Pleasant

Environmental Scientist II Division of Water Resources

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