



State of Tennessee
Department of Environment and Conservation
Knoxville Environmental Field Office
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June 22, 2018

Mr. Ashley Thomas
Regulatory and Natural Resources Specialist
Brookfield Smoky Mountain Hydro, LLC
314 Growdon Blvd.
Tallassee, Tennessee 37878

RE: Compliance Evaluation Inspections
Calderwood Hydro Plant
NPDES Permit TN0065510
Chilhowee Hydro Plant
NPDES Permit TN0065528
Blount County

Dear Mr. Thomas:

On June 18, 2018, Hassan Sanaat and I came to the Calderwood and Chilhowee Hydro Plants to conduct a routine Compliance Evaluation Inspection (CEI) for each facility. Each facility holds an NPDES permit for discharges of noncontact cooling waters and non-process wastewaters incidental to the operation of a hydroelectric power plant. We appreciate your assistance on that day, as well as Marshall Olson, and Kerry Strunk. Please note the following:

1. Calderwood Hydro Plant is covered by NPDES Permit TN0065510. This permit requires an annual report. The most recent annual report submitted was for 2017. No exceedances or notable problems were reported in 2016 or 2017. In 2017 there was one scheduled unwatering, not through the outfalls but directly through the turbine, of units 1 and 3 for maintenance. There was one instance in 2017 of slot cutting or drilling where water was filtered and released slowly on the upper side of the dam.
2. Chilhowee Hydro Plant is covered by NPDES TN0065528, which requires semi-annual submittal of Discharge Monitoring Reports.

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- a. In the monitoring for Chilhowee from the period March 1, 2016 to August 31, 2016, and again in the period September 1, 2016, to February 28, 2017, outfall 001 had a reported pH value each time of 4.75, which was outside the permit range of 6.0-9.0. During the same two periods outfall 003 had a reported pH reading each time of 5.98, which was also outside the required range. These anomalous results were attributed to the complete drawdown of Chilhowee reservoir which was being undertaken to allow repair work to the dam.
 - b. A Notice of Violation dated June 7, 2018, was recently issued by our Central Office concerning failure to submit Discharge Monitoring Reports for Chilhowee for the period September, 2017 to February, 2018. There have been personnel changes during this period which led to this oversight. We were told this would be corrected as soon as possible.
 - c. Our Central Office has just requested a permit renewal application for Chilhowee, which expires July 31, 2018. This application needs to be submitted as quickly as possible because it is required by the permit no later than 180 days in advance of expiration.
3. Both Calderwood and Chilhowee have had PCB containing units removed, and PCB monitoring and other requirements are not applicable.
 4. The sumps in both dams where discharges converge and pass through in both facilities are equipped with plastic line loop oil skimming systems. The sump in Calderwood is equipped with a sheen detection unit (G. E. Leakwise PS-220). The sump in Chilhowee is set to be equipped with such a unit, which is already stored at the site awaiting installation pending the solution of power and logistical issues. We would encourage completing this installation as this technology appears to be beneficial.
 5. At both facilities no objectionable color contrast, oil, or floating matter were noted in the receiving stream. Both appeared generally clean and in good order.

Your cooperation with this office is greatly appreciated. Should you have any questions, please do not hesitate to call me at 865-594-5521.

Sincerely,



Woodson L. Smith
Division of Water Resources

cc: Division of Water Resources, Enforcement and Compliance, Nashville