

Position paper on the Proposed Madisonville Wastewater Treatment Plant

By

Watershed Association of the Tellico Reservoir (WATeR)

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WATeR supports Madisonville's attempt to correct their non-compliance issues with Environmental Protection Regulations through a proposed new wastewater treatment facility. Currently, Madisonville discharges wastewater from their treatment facility into Bat Creek. The Tennessee Department of Environment and Conservation (TDEC) has cited the plant for non-compliance with EPA treatment standards for the last 12 quarters, with a long history of non-compliance preceding that. Fortunately, exposure to the atmosphere and sunshine significantly reduces the bacteria content before it reaches Tellico Lake about 20 miles downstream. Unfortunately, the pollutants in the discharge have taken a toll on the ecosystem of Bat Creek causing TDEC to include this creek on its list of impaired streams in Tennessee.

To remedy the non-compliance issues of the discharge from the Plant, Madisonville has proposed to build a new plant, but instead of discharging into Bat Creek, they plan to pipe the discharge directly to Tellico Lake and rely upon the larger body of water to dilute the effluent. Because the smaller Bat Creek does not provide for such dilution potential as does Tellico Lake, less in-plant treatment is proposed. Treating the wastewater only twice compared to the likely requirement for a third treatment process if discharged to Bat Creek could possibly save the city about \$1.5 million in capital cost.

WATeR opposes the proposal to discharge into Tellico Lake for several reasons:

- A major pollution discharge into the lower depths of Tellico Lake will have a much greater impact on the environment and be sustained for longer than a similar discharge into Bat Creek. Instead of natural treatment by exposure to the atmosphere and sunlight as it flows downstream in Bat Creek, such pollution discharged on the bed of the lake will remain for up to several months.
- The proposed discharge point is only 0.1 mile upstream of the current discharge pipe of the Wastewater Treatment Plant of the Tellico Reservoir Development Agency (TRDA). It will be impossible to determine which discharge is responsible for pollution if it were to occur. Neither plant will assume responsibility.
- The current Madisonville Plant has a long and consistent history of failure to comply with treatment and discharge limits of the state of Tennessee. Furthermore, TDEC has been ineffective in enforcing penalties and fines to Madisonville associated with these non-compliance citations. Consequently, the town has no incentive to adhere to EPA standards once the discharge water has been piped 20 miles away from their town with little threat of effective enforcement.

- Madisonville has rejected two opportunities to contract for piping untreated wastewater to two separate established treatment plants with excellent staff and facilities, because they refused to pay requested fees for treatment. That begs the question: Can Madisonville be expected to establish a fee structure appropriate to operate and maintain their own facility with a high degree of efficiency and reliability if they have declined the opportunity to pay appropriate fees to these other plants?

Tellico Lake is correctly perceived as one of the cleanest lakes of the TVA system. It attracts recreational boating and fishing from throughout the region. This reputation is an essential element in recruiting new residents and clean industry. Maintaining this level of cleanliness is thus a major contribution to the economy of both counties. Polluting this lake, however, would have a far greater effect on the economy of the region than any possible effect on the rural region surrounding Bat Creek.

There are other alternatives available to Madisonville that do not involve such potential environmental pollution concerns. We urge the town to select another option that would minimize the pollution to Bat Creek, while at the same time preserve the water quality of Tellico Lake.

We encourage the residents of the region around Tellico Lake to write TDEC and their state senators and representatives in opposing the application for permitting the proposed discharge. For additional information, please contact Bill Waldrop, Chairman of WATeR's Water Quality Improvement Committee at WRWaldrop@aol.com. Contact information for government officials is present below:

General Assembly - All legislators may be reached at 1-800-449-8366, then enter the last five digits of their office phone number listed below.

Senator Randy McNally, District 5
307 War Memorial Building
Nashville, TN 37243
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Representative Jimmy Matlock, District 21
219 War Memorial Building
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Governor Bill Haslam
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