

Wastewater Enforcement: Tennessee Department of Environment & Conservation Order Addressing Knoxville Gasoline Convenience Store



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01/20/2022

The Tennessee Department of Environment & Conservation (“TDEC”) issued a January 11th Director’s Order and Assessment (“Order”) to Pilot Travel Centers LLC (“Pilot”) addressing alleged violations of the Tennessee Water Quality Control Act. See Director’s Order No. WPC21-0152.

The Order provides that Pilot owns and operates a gasoline service station and convenience store (“Facility”) in Knoxville, Tennessee.

The TDEC Division of Water Resources (“Division”) is stated to have issued a National Pollution Discharge Elimination System (“NPDES”) permit to Pilot on August 1, 2018, for the Facility. Such permit is stated to authorize the discharge of stormwater runoff and wash water through Internal Monitoring Point 02A at Grable Branch which eventually flows to Hickory Creek.

The Order references three Notice of Violations issued to Pilot from 2020 to 2021 and responses from the company explaining the potential causes of violations and corrective actions taken to resolve them.

The referenced Pilot Facility is stated to have appeared on the United States Environmental Protection Agency Quarterly Non-Compliance Report for multiple quarters during the monitoring period of June 1, 2020, through November 30, 2021, for effluent limitation exceedances. Further, Pilot is stated to have reported the following NPDES permit effluent violations on its Discharge Monitoring Reports for the Facility during the monitoring periods from June 2020 to November 2021:

- E.Coli - 7
- Solids, Total Suspended - 17

The Order provides that Pilot is assessed a civil penalty of \$5,027. Further, Pilot is required to pay contingent penalties of \$45,243 as outlined in Items 3-6 of the Order. Items 3-6 of the Order provide for Pilot to submit a Corrective Action Plan to the Division within certain time periods. In addition, the Division is required to approve such actions by Pilot which are required to eventually result in compliance.

The Order provides Pilot certain appeal rights.

A copy of the Order can be downloaded [here](#).