IN THE TENNESSEE PUBLIC UTILITY COMMISSION AT NASHVILLE, TENNESSEE

IN RE:)
)
PETITION OF TENNESSEE WATER)
SERVICE, INC., ALONG WITH CORIX) DOCKET NO. 22-00114
INFRASTRUCTURE (US) INC., FOR)
APPROVAL OF AUTHORITY TO)
TRANSFER CONTROL)

RESPONSES OF TENNESSEE WATER SERVICE, INC. ("TWS") AND CORIX INFRASTRUCTURE (US) INC. ("CORIX US") TO CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS

Tennessee Water Service, Inc. ("TWS") and Corix Infrastructure (US), Inc. ("CORIX US") (collectively "Petitioners"), by and through counsel, hereby submits their Responses to the Second Discovery Requests propounded by the Consumer Advocate Unit in the Financial Division of the Attorney General's Office ("Consumer Advocate").

GENERAL OBJECTIONS

- Petitioners object to all requests that seek information protected by the attorney-client privilege, the work-product doctrine and/or any other applicable privilege or restriction on disclosure.
- 2. Petitioners object to the definitions and instructions accompanying the requests to the extent the definitions and instructions contradict, are inconsistent with, or impose any obligations beyond those required by applicable provisions of the Tennessee Rules of Civil Procedure or the rules, regulations, or orders of the Tennessee Public Utility Commission ("TPUC" or "Commission").

- 3. The specific responses set forth below are based on information now available to Petitioners, and Petitioners reserve the right at any time to revise, correct, add to or clarify the objections or responses and supplement the information produced.
- 4. Petitioners object to each request to the extent that it is unreasonably cumulative or duplicative, speculative, unduly burdensome, irrelevant or seeks information obtainable from some other source that is more convenient, less burdensome or less expensive.
- 5. Petitioners object to each request to the extent it seeks information outside Petitioners' custody or control.
- 6. Petitioners' decision, now or in the future, to provide information or documents notwithstanding the objectionable nature of any of the definitions or instructions, or the requests themselves, should not be construed as: (a) a stipulation that the material is relevant or admissible, (b) a waiver of Petitioners' General Objections or the objections asserted in response to specific discovery requests, or (c) an agreement that requests for similar information will be treated in a similar manner.
- 7. Petitioners object to those requests that seek the identification of "any" or "all" documents or witnesses (or similar language) related to a particular subject matter on the grounds that they are overbroad and unduly burdensome and exceed the scope of permissible discovery.
- 8. Petitioners object to those requests that constitute a "fishing expedition," seeking information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence and is not limited to this matter.
- 9. Petitioners do not waive any previously submitted objections to the Consumer Advocate's discovery requests.

RESPONSIBLE WITNESS: Legal Counsel

2-1. Explanation and Source & Support. Refer to the Companies' *Petition*, p.13, ¶ 23.¹ The Companies indicate that the merger would create a larger, stronger water and wastewater company. With respect to the claim that the resulting, combined entity will be "stronger," the response to Consumer Advocate DR No. 1-6 indicates that SouthWest Water Company ("SWW") has a balance of Goodwill of approximately \$484 million, contrasted with a Shareholders' Equity balance of approximately \$456 million. Provide evidence, including regulatory orders if applicable, which support the Companies' position that the Goodwill asset is likely to be recovered in future regulatory proceedings. For purposes of this response, please disregard providing the requested information for any jurisdiction in which the corresponding Goodwill balance is less than \$25 million. It is noted within the response to Consumer Advocate DR No. 1-18 that the Goodwill balance associated with the Palmetto acquisition is over \$262 million.

RESPONSE: Petitioners object to the request as phrased because Petitioners have not taken the "position that the Goodwill asset is likely to be recovered in future regulatory proceedings." Moreover, Petitioners have not made any claim for recovery of Goodwill in the present case. As such, this request is irrelevant to the issues in this case.

Petition of Tennessee Water Service, Inc. and Corix Infrastructure (US) Inc., for Approval of Authority to Transfer Control Pursuant to Tenn. Code Ann § 65-4-113, TPUC Docket No. 22-00114 (November 9, 2022), at 13.

RESPONSIBLE WITNESS: Steve Lubertozzi

2-2. Explanation and Source & Support. Refer to Mr. Lubertozzi's testimony, p. 19, line 310.2 What operational metrics are in place and are relied upon in making the statement that "TWS will continue to provide high-quality water utility service to its customers"? Provide the results of such operational metrics for both calendar year 2021 and calendar year 2022.

RESPONSE:

TWS's primary focus is providing its customers with high-quality, safe, and reliable water service. TWS meets or exceeds the water quality requirements in the EPA Safe Drinking Water Act and all environmental regulatory requirements regulated by the Tennessee Department of Environmental Compliance. Each year TWS, through its operations team, produces a Consumer Confidence Report ("CCR") that displays each year's water quality results and the steps that have been taken to provide uninterrupted water service. TWS prides itself on the delivery of continuous service to its customers. Attached please find TWS's 2021 CCR. TWS's 2022 CCR is not yet available but will be provided when it becomes available.

Direct Testimony of Steven Lubertozzi on behalf of Tennessee Water Service, Inc., TPUC Docket No. 22-00114 (November 9,2022), at 19, line 310.

RESPONSIBLE WITNESS: Steve Lubertozzi and Brian Bahr

2-3. Explanation. Refer to Responses of Tennessee Water Service, Inc, ("TWS") and Corix Infrastructure (US) Inc. ("Corix US") to the Consumer Advocate's First Set of Discovery Requests, DR No. 1-9.3 Provide a comprehensive discussion of the system or process that will be put in place to track such integration costs.

RESPONSE:

SouthWest Water Company ("SWWC") and Corix use their respective ERP systems to track integration-related costs. SWWC uses the SAP PS (Project System) module, while Corix uses Oracle Project Financial Management. Within each system, discrete 'Projects' are created. Projects are used as containers to capture, analyze and report financial and related non-financial information. Each Project has a unique identifier, and these project identifiers can be selected by individuals when performing tasks such as:

- Employees entering and recording expenses for reimbursement;
- Employees reconciling costs incurred on a company-issued payment card;
- Buyers issuing supplier Purchase Orders; and
- Accounts Payable Processing invoices.

These capabilities generally allow individuals to assign costs to specified Projects. SWWC and Corix can review, analyze, and account for the individual and total costs assigned to each project. In addition, tasks and subtasks can be created within projects if needed. Therefore, SWWC, Corix and TWS can track costs by type or integration activity.

Responses of Tennessee Water Service, Inc, ("TWS") and Corix Infrastructure (US) Inc. ("Corix US") to Consumer Advocate's First Set of Discovery Requests, TPUC Docket No. 22-00114 (February 13, 2023), at 12.

RESPONSIBLE WITNESS: Steve Lubertozzi

2-4. Explanation. Refer to Responses of Tennessee Water Service, Inc, ("TWS") and Corix Infrastructure (US) Inc. ("Corix US") to the Consumer Advocate's First Set of Discovery Requests, DR No. 1-9 through DR No. 1-11.⁴ Is TWS committed to eliminating any incremental integration costs to the extent such costs exceed integration savings in its next rate proceeding? If not, please address the appropriate regulatory policy which supports the recovery of incremental integration costs, net of integration savings.

RESPONSE:

To the extent the costs of integrating administrative and general functions exceed benefits, TWS will not seek to recover net costs. However, TWS will request recovery, in future rate case proceedings, of the costs of integrating administrative and general functions to the extent that the benefits of integrating administrative and general functions meet or exceed such costs.

RESPECTFULLY SUBMITTED,

Ryan Freeman

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⁴ *Id.* at 14.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Victoria B. Glover

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Email: <u>Victoria.Glover@ag.tn.gov</u> Email: <u>Karen.Stachowski@ag.tn.gov</u>

This the 13th day of March, 2023.

Ryan Freeman

Pyan Freeman

Chalet Village North Water System

PWS ID: **TN0000849**



Annual Water Quality Report 2021

Message from Tiffany Van Horn, President

Dear Valued Customer,

Tennessee Water Service is pleased to present your Annual Water Quality Report for 2021. Transparency, health, and safety are key priorities in our company's efforts to provide a high-quality, reliable water supply. Included in this report are details about where your water comes from, what it contains, and how it compares to regulatory standards.

As the Coronavirus (COVID-19) outbreak has evolved, transparency, health, and safety have guided our efforts to mitigate any potential public health or business impacts. Since the start of the pandemic, we continue to focus on protecting employee and public health and ensuring we continue to provide our customers and the community with safe, reliable, and uninterrupted water services.

We are proud to share this report which is based on water quality testing through December 2021. You will find that we supply water that meets or exceeds all federal and state water quality regulations at your tap. Our team is comprised of proud members of the community who are dedicated to providing safe, reliable and cost-effective service to you. This commitment includes acting with integrity, protecting the environment, and enhancing the local community. Maintaining a safe and reliable water supply is hard work. Our devoted local team of water quality experts are working in the community every day, ensuring that our customers are our top priority, and providing the highest quality drinking water and service – now and well into the future.

Best regards,

Diffays Van Horm

COVID-19 Response

According to the Centers for Disease Control and Prevention (CDC) and the US Environmental Protection Agency (EPA), the virus that causes COVID-19 has not been detected in drinking water. Conventional water treatment methods that use disinfection, such as those provided by Tennessee Water Service, should remove or inactivate the virus that causes COVID-19 as they do for other pathogens. Based on current evidence, the risk to water supplies remains low. Customers can continue using and drinking tap water as usual. The EPA also encourages the public to help keep household plumbing and our nation's water infrastructure operating properly by only flushing toilet paper. Disinfecting or other sanitary wipes, including those labeled as "flushable" and other non-toilet paper items, should NOT be flushed in toilets.

For more information, visit the CDC at https://www.cdc.gov/coronavirus/2019-ncov/php/water.html and EPA at https://www.epa.gov/coronavirus/coronavirus-and-drinking-water-and-wastewater.

Source of Drinking Water

Your water comes from groundwater wells located in Sevier County which draw water from a fractured bedrock aquifer. An aquifer is a geological formation that contains water. A portion of your water is purchased from the City of Gatlinburg Water System which draws surface water from the West Prong of the Little Pigeon River and also purchases water from the City of Pigeon Forge.

Source Water Assessment/Wellhead Protection

The Tennessee Department of Conservation (TDEC) has prepared a Source Water Assessment Program (SWAP) Report for the water supplies serving water to this system. Chalet Village North was rated as low in susceptibility to potential contamination. The City of Gatlinburg was rated as moderately susceptible to potential contamination. The Source Water Assessment Report can be viewed online at https://www.tn.gov/environment/program-areas/wr-water-resources/water-quality/source-water-assessment.htm or call TDEC at 1-888-891-TDEC to obtain a copy. In addition, Chalet Village North has developed a Wellhead Protection Plan, outlining how we protect our groundwater sources. If interested, please contact our Customer Service Department at (800) 531-2321.

Help Protect our Resources

Help put a stop to the more than 1 trillion gallons of water lost annually nationwide due to household leaks. These easy to fix leaks waste the average family the amount of water used to fill a backyard swimming pool each year. Plumbing leaks can run up your family's water bill an extra 10 percent or more, but chasing down these water and money wasting culprits is as easy as 1—2—3. Simply check, twist, and replace your way to fewer leaks and more water savings:

- ⇒ <u>Check</u> for silent leaks in the toilet with a few drops of food coloring in the tank, and check your sprinkler system for winter damage.
- ⇒ Twist faucet valves; tighten pipe connections; and secure your hose to the spigot. For additional savings, twist a WaterSense labeled aerator onto each bathroom faucet to save water without noticing a difference in flow. They can save a household more than 500 gallons each year—equivalent to the amount water used to shower 180 times!
- ⇒ Replace old plumbing fixtures and irrigation controllers that are wasting water with WaterSense labeled models that are independently certified to use 20 percent less water and perform well.

For more information visit www.epa.gov/watersense.

We ask that all our customers help us protect our water sources which are the heart of our community, our way of life and our children's future.

Este informe contiene información muy importante sobre su agua beber. Tradúzcalo ó hable con alguien que lo entienda bien.

EPA Wants You To Know

from human activity.

include:

- A. Microbial contaminants, such as viruses and bacteria, which may come from sewage treatment plants, septic lead. systems, agricultural livestock operations, and wildlife.
- B. Inorganic contaminants, such as salts and metals, which can be naturally-occurring or result from urban stormwater runoff, industrial or domestic wastewater discharges, oil and gas production, mining, or farming.
- C. **Pesticides and herbicides**, which may come from a variety of source's such as agriculture, urban stormwater runoff, and residential uses.
- D. Organic chemical contaminants, including synthetic and volatile organic chemicals, which are by-products of industrial processes and petroleum production, and can also come from gas stations, urban stormwater runoff, and septic systems.
- E. Radioactive contaminants, which can be naturally occurring or be the result of oil and gas production and mining activities.

What measures are in place to ensure water is safe to drink?

In order to ensure that tap water is safe to drink, the EPA prescribes regulations, which limit the amount of certain contaminants in water provided by public water systems. The Food and Drug Administration (FDA) regulations establish limits for contaminants in bottled water, which must provide the same protection for public health.

Drinking water, including bottled water, may reasonably be expected to contain at least small amounts of some contaminants. The presence of contaminants does not • Put strainers in sink drains to catch food scraps / solids necessarily indicate that the water poses a health risk. More information about contaminants and potential health effects can be obtained by calling the Environmental Protection Agency's Safe Drinking Water Hotline at 1-800-426-4791.

Special notice from EPA for the elderly, infants, cancer patients and people with HIV/AIDS or other immune system problems

Some people may be more vulnerable to contaminants in drinking water than the general population. Immunocompromised persons such as persons with cancer undergoing chemotherapy, who pers ons undergone organ transplants, people with HIV/AIDS or other immune system disorders, some elderly, and infants can be particularly at risk from infections. These people should seek advice about drinking water from their health care providers. EPA/CDC guidelines on appropriate means to lessen the risk of infection by Cryptos por idium and other microbial contaminants are available from the Safe Drinking Water Hotline (1-800-426-4791).

Information Concerning Lead in Water

If present, elevated levels of lead can cause serious health problems, especially for pregnant women and young children. Lead in drinking water is primarily from materials and components associated with service lines and home

plumbing. Tennessee Water Service is responsible for The sources of drinking water (both tap water and bottled providing high quality drinking water, but cannot control the water) include rivers, lakes, streams, ponds, reservoirs, variety of materials used in plumbing components. When springs, and wells. As water travels over the surface of the your water has been sitting for several hours, you can land or through the ground, it dissolves naturally occurring minimize the potential for lead exposure by flushing your tap minerals and, in some cases, radioactive material, and can for 30 seconds to 2 minutes before using water for drinking pick up substances resulting from the presence of animals or or cooking. If you are concerned about lead in your water, you may wish to have your water tested. Information on Contaminants that may be present in source water lead in drinking water, testing methods, and steps you can take to minimize exposure is available from the Safe Drinking Water Hotline or at http://www.epa.gov/safewater/

> Water that remains stationary within your home plumbing for extended periods of time can leach lead out of pipes joined with lead-containing solder as well as brass fixtures or galvanized pipes. Flushing fixtures has been found to be an effective means of reducing lead levels. The flushing process could take from 30 seconds to 2 minutes or longer until it becomes cold or reaches a steady temperature. Faucets, fittings, and valves, including those advertised as "lead-free," may contribute lead to drinking water. Consumers should be aware of this when choosing fixtures and take appropriate precautions. Visit the NSF Web site at <u>www.nsf.org</u> to learn more about lead-containing plumbing fixtures.

Drain Disposal Information

Sewer overflows and backups can cause health hazards, damage home interiors, and threaten the environment. A common cause is sewer pipes blocked by grease, which gets into the sewer from household drains. Grease sticks to the insides of pipes. Over time, the grease can build up and block the entire pipe. Help solve the grease problem by keeping this material out of the sewer system in the first

- Never pour grease down sink drains or into toilets. Scrape grease into a can or trash.
- for disposal.

Prescription Medication and Hazardous Waste

Household products such as paints, cleaners, oils, and pesticides, are considered to be household hazardous Prescription and over-the-counter drugs poured down the sink or flushed down the toilet can pass through the wastewater treatment system and enter rivers and lakes (or leach into the ground and seep into groundwater in a septic system). Follow the directions for proper disposal procedures. Do not flush hazardous waste or prescription and over-the-counter drugs down the toilet **or drain.** They may flow downstream to serve as sources for community drinking water supplies. Many communities offer a variety of options for conveniently and safely managing these items. For more information, visit the EPA website at: www.epa.gov/hw/household-hazardous-wastehhw.

The Safe Drinking Water Act was passed in 1974 due to congressional concerns about organic chemical contaminants in drinking water and the inefficient manner by which states supervised and monitored drinking water supplies. Congress' aim was to assure that all citizens served by public water systems would be provided high quality water. As a result, the EPA set enforceable standards for health-related drinking water contaminants. The Act also established programs to protect underground sources of drinking water from contamination.

Understanding This Report In o abbreviations that are contained in it	rder to help you understand this report, we want you to understand a few terms and .							
Action level (AL)	The concentration of a contaminant which, if exceeded, triggers treatment or other requirements that a water system must follow.							
Action level goal (ALG)	Action level goal is the level of a contaminant in drinking water below which there is no known or expected risk to health. ALGs allow for a margin of safety.							
EPA	Environmental Protection Agency.							
Locational Running Annual Average (LRAA)	The average of sample analytical results for samples taken at a particular monitoring location during the previous four calendar quarters using the best available treatment technology.							
Maximum Contaminant Level (MCL)	The highest level of a contaminant that is allowed in drinking water. MCL's are set as close to the MCLG's as feasible using the best available treatment technology.							
Maximum Contaminant Level Goal (MCLG)	The "goal" is the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLG's allow for a margin of safety.							
Maximum Residual Disinfectant Level (MRDL)	The highest level of a disinfectant allowed in drinking water. There is convincing evidence that addition of a disinfectant is necessary for control of microbial contaminants.							
Maximum Residual Disinfectant Level Goal (MRDLG)	The level of a drinking water disinfectant below which there is no known or expected risk to health. MRDLGs do not reflect the benefits of the use of disinfectants to control microbial contaminants.							
Not applicable (N/A)	Not applicable.							
Not Detected (ND)	Analysis or test results indicate the constituent is not detectable at minimum reporting limit.							
Parts per million (ppm) or Milligrams per liter (mg/l)	One part per million corresponds to one minute in two years or a single penny in \$10,000.							
Parts per billion (ppb) or Micrograms per liter (ug/l)	One part per billion corresponds to one minute in 2,000 years or a single penny in \$10,000,000.							
Picocuries per liter (pCi/L)	A measure of radioactivity in the water.							
Running Annual Average (RAA)	Calculated running annual average of all contaminant levels detected.							
Nephelometric Turbidity Units (NTU)	A measure of the clarity of water. Turbidity does not pose any risk to your health. Turbidity is monitored as an indication that our filtration system is functioning properly.							
Treatment Technique (TT)	A treatment technique is a required process intended to reduce the level of a contaminant in drinking water.							
Turbidity	A measure of the cloudiness of the water. It is monitored because it is a good indicator of the effectiveness of the filtration system.							

Monitoring Your Water

We routinely monitor for contaminants in your drinking water according to Federal and State laws. The tables below lists all the drinking water contaminants that were <u>detected</u> in the last round of sampling for each particular contaminant group. The presence of contaminants <u>does not</u> necessarily indicate that water poses a health risk. **Unless otherwise noted, the data presented in the table is from testing done January 1 through December 31, 2021.** The EPA or the State requires us to monitor for certain contaminants less than once per year because the concentrations of these contaminants are not expected to vary significantly from year to year. Some of the data, though representative of the water quality, maybe more than one year old.

If You Have Questions Or Want To Get Involved

Tennessee Water Service does not have regularly scheduled public meetings. Please contact our Customer Service Department at (800) 531-2321 should you have any questions.

Violations

In 2021, Tennessee Water Service received a violation for failing to perform lead and copper monitoring during the required time period of June-September. Samples were collected in October 2021 with no exceedances. Our lead and copper monitoring schedule has been increased from once every 3 years to once every 6 months. Monitoring for all other contaminants was performed, and we did not exceed any allowable levels for these contaminants.

To access your utility account anytime, anywhere, please register for our customer portal & download MyUtilityConnect at https://connect.myutility.us/connect/

Water Quality Test Results - Tennessee Water Service, Inc.										
Contaminant (units)	Year Sampled	AL Exceedance Y/N	Your Water	# of sites found above the AL	MCLG	MCL	Likely Source of Contamination			
Lead and Copper Contaminants										
Copper (ppm) (90 th percentile)	2021	N	0.775	0	1.3	AL= 1.3	Corrosion of household plumbing systems; erosion of natural deposits; leaching from wood preservatives.			
Lead (ppb) (90th percentile)	2021	N	ND	0	0		Corrosion of household plumbing systems; erosion of natural deposits.			

Please see the *Violations* section on Page 3 of this report for a violation we received regarding our 2021 lead and copper monitoring.

Please see the violations section on Page 3 of this report for a violation we received regarding our 2021 lead and copper monitoring.											
Contaminant (units)	Year Sampled	MCL Violation Y/N	Your Water	Range Low High	MCLG	MCL	Likely Source of Contamination				
Nitrate/Nitrite Contaminants											
Nitrate, as Nitrogen (ppm)	2021	N	1.75	0.459 - 1.75	10	10	Runoff from fertilizer use; leaching from septic tanks, sewage; erosion of natural deposits				
Inorganic Contaminar	Inorganic Contaminants										
Arsenic (ppb)	2021	N	1.44	ND - 1.44	0	10	Erosion of natural deposits; runoff from orchards; runoff from glass and electronic production wastes				
Stage 2 Disinfection	Stage 2 Disinfection Byproduct Compliance										
TTHM (ppb) [Total Trihalomethanes]	2021	N	36.4	N/A	N/A	80	Byproduct of drinking water disinfection				
HAA5 (ppb) [Total Haloacetic Acids]	2021	N	26.3	N/A	N/A	60	Byproduct of drinking water disinfection				
Disinfectant Residuals Summary											
Contaminant (units)	Year Sampled	MRDL Violation Y/N	Your Water (highest RAA)	Range Low High	MRDLG	MRDL	Likely Source of Contamination				
Chlorine (ppm)	2021	N	1.20	1.0 - 1.5	4	4.0	Water additive used to control microbes				

Unregulated Contaminants

Unregulated contaminants are those for which EPA has not established drinking water standards. The purpose of unregulated contaminant monitoring is to assist EPA in determining the occurrence of unregulated contaminants in drinking water and whether future regulation is warranted. For additional information call the Safe Drinking Water Hotline at (800) 426-4791.

Unregulated Inorganic Contaminants

Contaminant (units)	Sample Date	Level Detected (highest)	Range Low High	Secondary MCL					
Sodium (ppm)	2019, 2021	10.6	8.41 - 10.6	No Limit					
Unregulated VOC Contaminants									
Contaminant (units)	Sample Date	Level Detected (highest)	Range Low High	Likely Source of Contamination					
Chloroform (ppb)	2019, 2021	2.74	ND - 2.74	Byproduct of drinking water disinfection					

PFAS Testing

Tennessee Water Service continues efforts to conduct statewide drinking water testing for Per- and Polyfluoroalkyl Substances (PFAS). These man-made compounds are used in the manufacturing of products resistant to water, grease or stains including firefighting foams, cleaners, cosmetics, paints, adhesives and insecticides. PFAS can migrate into the soil, water, and air and is likely present in the blood of humans and animals all over the world. The Environmental Protection Agency (EPA) has established a health advisory level at 70 parts per trillion.

For the latest PFAS results, visit our website at www.epa.gov/ground-water-and-drinking-water/drinking-water-health-advisories-pfoa-and-pfos.

Tennessee Water Service is committed to providing safe, reliable, and cost-effective drinking water services to all our customers.

Visit us online at www.tennesseewaterservice.com



Or Join us on Facebook@TennesseeWaterService & Twitter@WaterTennessee



2021 Water Quality Test Results - City of Gatlinburg Water System

Please see the following sample results for water quality tests conducted by the <u>City of Gatlinburg Water System (PWS ID# 0000256)</u>. If you have any questions about this information, please contact Mr. Dale Phelps, Utilities Manager, at (865) 436-4681.

	MCLG in CCR units		CCR units	Number of Samples Exceeding AL	Range of Detections Low High	Violations	Year Sampled	Typical Source of Contaminant	
Microbiological Contaminants									
*Turbidity	N/A	TT	0.27 NTU	0	0.04 - 0.27	None	2021	Soil runoff	
**Total Organic Carbon (TOC)	N/A	TT	ND	0	ND	None	2021	Precursor for control of disinfection by-products	

^{*}Turbidity - To comply with the TT, 95% of turbidity samples must be less than 0.3 NTU. Gatlinburg's filter plant met this standard in 99.9% of samples collected during the year.

^{**} Total Organic Carbon (TOC) - During the calendar year, Gatlinburg was required to achieve a 35% reduction in TOC. The treatment technique for TOC was met.

Inorganic Contaminants									
Fluoride (ppm)	4	4	0.7805 (Average of 4 Quarters)	0	0.714 - 0.895	None	2021	Erosion of natural deposits; water additive which promotes strong teeth; discharge from fertilizer and aluminum factories	
Nitrate (ppm)	10	10	0.127	0	N/A	None	2021	Runoff from fertilizer use; leaching from septic tanks; sewage; erosion from natural deposits	
Sodium (ppm)	N/A	N/A	6.1	0	N/A	None	2021	Naturally present in the environment	

