

## Patsy Fulton

**From:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Sent:** Wednesday, November 6, 2019 9:11 AM  
**To:** Patsy Fulton  
**Cc:** Michelle Mairs; Aaron Conklin  
**Subject:** [EXTERNAL] RE: Docket #95-00293  
**Attachments:** Cross Plains Field.pdf

05-00293

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Patsy –

The system was inspected by TDEC in 2017 prior to the issuance of the most recent permit – specifically to determine compliance with the SOP - and it was found to be compliant (see attached report). No changes have been made to the facility since that inspection.

The reason drip, electricity, etc... has not been installed at the site yet is because given the size of the lagoon, it's not necessary at this time. It is designated a non-discharging system, meaning the treated effluent remains in the lagoon and evaporates. It would be a waste of tens to hundreds of thousands of dollars to install infrastructure that will rot while it sits in the ground not being utilized. Once the system has enough connections to warrant discharge, the remaining infrastructure will be installed. Telemetry is not hooked up because the system does not discharge.

As for the capacity of the system stated on the permit, as new connections are made, the permit will be modified to show an increase in the capacity to account for those connections. As it stands, the 10,600 gpd represents design flow. Actual flow into the plant is less than 10,000 gpd.

As far as I know, all 52 residential connections are from B&P Investments. Stoney Brook adds 19 to that total. There are still only 3 commercial connections to the system. If and when B&P Investments or any successors or assigns decide to connect more homes to the system, the system will be able to handle it and any necessary system upgrades (technology and/or infrastructure) will be made. It's my understanding that Adenus Capacity will be responsible for any upgrades to the system, including the installation of drip.

Thanks,

Jeff

**From:** Patsy Fulton <Patsy.Fulton@tn.gov>  
**Sent:** Monday, November 4, 2019 3:21 PM  
**To:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Cc:** Michelle Mairs <Michelle.Mairs@tn.gov>; Aaron Conklin <Aaron.Conklin@tn.gov>  
**Subject:** RE: Docket #95-00293

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Jeff,

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Based on the fact that the system has not been built out to TDEC specifications in the permit, you probably need to file for a CCN. The Commission does support the TDEC requirements so if the utility has a SOP for 10,600 gpd that is what the Commission supports. The original CCN did allow for 150; however, the Commission certainly thought at the time that the wastewater utility would be compliant with TDEC rules. The Staff now tries to insure the utility is compliant with all State of Tennessee rules prior to recommending the CCN. I understand that TWSI does not always agree with TDEC specifications; however, for the system to be compliant in Tennessee, it does need all that is required on the permit. TWSI personnel were even in agreement when Maple Green went down with the sink hole. Would Maple Green and Cedar Hill have been as critical, had there been drip fields and the required electricity, etc. We don't know that and we never will; however, compliancy with the permit would help with your support in situations such as these. I am here only to retrieve all information, not to rule.

In addition, we have no contract or anything else on B&P Investments from the original filing, since it was from 2005 and a time that we didn't think we would need all the documents on file. What happened to B&P Investments? Are they still expecting sewer for the 150 lots for the 60 acres of land they traded?. Also, we probably need an understanding of the capacity credits that Pickney Brothers have or since Pickney Bros. doesn't exist anymore, who owns the 1000 credits of capacity and how many credits have been used? We are going to need the deed, the contract, etc. just like you have been providing on the Milcrofton sites. Next thing you know B&P will start building and have 150 homes built and sending to the same 75,000 lagoon without all the criteria to make it compliant. By the way, will Pickney Bros., or whoever owns the capacity credits now be responsible for finishing the wastewater system with the electricity, drip fields, pumps, filters, etc.? I would rather be pro-active with these situations than have the emergencies that we continue to experience. Are most of those 50+ connected lots from other developers and new contracts, not from B&P Investments?

Is Bonnie Brooks one of the subdivisions using the Cross Plains system? That was 19 homes, correct? What homes make up the other 33 connections? How many commercial? Is it still the Church, Dollar General and the service station? Are there any other commercial businesses connected to the system?

Since there are 52 residential connections (52 x 300=15,600 gpd) and 3 commercial businesses totaling 2,400 gpd expected usage, would that not be 18,000 gpd flow? Finally, if there is a control panel there and a building to house the equipment (what equipment), why would telemetry not be available?

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**From:** Jeff Riden [<mailto:Jeff.Riden@Adenus.com>]

**Sent:** Monday, October 28, 2019 3:34 PM

**To:** Patsy Fulton

**Cc:** Michelle Mairs; Aaron Conklin

**Subject:** [EXTERNAL] RE: Docket #95-00293

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Patsy –

I refiled the petition on the 24<sup>th</sup> with the corrected information.

Currently the system has 52 residential customers from the originally planned subdivision. There are 98 lots left, however there have been no recent discussions on the part of the developer of tying these on to the system. There are also 3 commercial accounts connected to the system. The city has not connected anything to the plant. The current plant is just the lagoon. I believe it's permitted for 10,600 gpd, however as built it is capable of treating 74,000 gpd. The site currently does not discharge (not receiving enough flow to necessitate). Drip fields are not installed, nor needed at this point since the system is not discharging. There is a control building and panel.

I'll file the contract with the developer once we receive it. That 60 acres at Dogwood Land is the treatment facility. Deed probably wasn't filed because we never got a copy of it.

Thanks,

Jeff

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**From:** Patsy Fulton <Patsy.Fulton@tn.gov>  
**Sent:** Wednesday, October 23, 2019 4:00 PM  
**To:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Cc:** Michelle Mairs <Michelle.Mairs@tn.gov>; Aaron Conklin <Aaron.Conklin@tn.gov>  
**Subject:** Docket #95-00293

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Jeff,

We received a filing today for Docket # 95-00293; however, there is not a Docket # 95-00293. I think you meant to file in Docket # 05-00293. In addition Stonebrook subdivision was noted in the letter; however, the attached filings noted Stoney Brook as the subdivision name. Finally, I think you meant Robertson County as the location of the subdivision; however, the letter notes Robinson County. I have the copies on my desk of the electronic filing; however, we haven't filed them yet due to the docket number being in error. If you haven't mailed the hard copies yet, please correct them and re-send Tori a new filing with the correct information for the electronic filing.

Did B&P Investments (original developer) complete their 150 home subdivision? What stage is it in the build-out? What has the City connected to the system thus far? In addition, could you please provide me a list of what is already connected to this particular site by subdivision name or business name; an electronic map with all the rule requirements—I say electronic because that was what worked in 18-00107 for me to be able to adequately review; a full explanation on where the system is today in the build-out of the system. Previously, when Maple Green developed the sink hole, I believe this was one of the lagoons that did not have a drip field, pumps, electricity, etc. Is it 100% completely built-out now to TDEC's specifications? Finally, I will need a copy of the contract that TWSI has with Stoney Brook/Stonebrook.

We never received a copy of the deed for the docket file; however, I did find it on the Tennessee Property website as 60 acres on Dogwood Lane in TWSI's name. Please confirm.

Thanks, Patsy

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STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243

**Land Based Systems Inspection Report**

**Facility:** Cross Plains Treatment Facility  
**Address:** Off Hwy 25  
**County:** Robertson **City:** Cross Plains  
**UIC Authorization #** ROB 0000025 **SOP-** 05057  
**Purpose of Visit:** Compliance Inspection  
**Responsible Management Entity:** Brian Carter Charles Hyatt, Adenus

**Type of System**

		Latitude	Longitude
Oxidation( Deep Cell) Lagoon	X	36*31'55.7"	-86*39'38.2"

**Dispersal Application**

		Latitude	Longitude
Drip	Spacing	Not installed	

**Waste Stream Characterization** Domestic X Commercial/Industrial X  
**Disinfection** UV        Chlorination        Other        None X  
**Fencing** Yes        No         
**Signs** Yes X No        Locations at gate  
**Lagoon Discharging** Yes        No X  
**Water Level Monitor** Yes        No X  
**Design Capacity** 10600 gpd **Current Flow** not discharging

**Comments**

Site inspection to determine compliance with the SOP.  
The system consists of a deep cell lagoon with drip dispersal, no disinfection.  
Lagoon appears to be holding effluent. Vegetation recently removed from within  
the banks, The drip lines have not been installed as of yet. The area has a locked gate  
with a sign at the entrance, however 4 wheeler tracks were observed all around the site.  
Access is not limited. No limiting karst features were noted.

**Inspected By:** Allen Rather **Date:** 3/02/2017

**Signature:** \_\_\_\_\_



**Patsy Fulton**

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**From:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Sent:** Friday, November 8, 2019 11:51 AM  
**To:** Patsy Fulton  
**Subject:** [EXTERNAL] RE: Docket 05-00293

10/6/2  
05-00293

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Patsy –

As a quick follow up to your questions about connections to the Cross Plains facility, there are 19 homes actually connected to the facility out of the 52 residences platted (these are the ones at Bonnie Brook). So there's only about 3000 or so gallons of effluent per day coming into the lagoon, plus the commercial flow which at most would be another 1000 gpd, but likely much less.

Thanks,

Jeff

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**From:** Patsy Fulton <Patsy.Fulton@tn.gov>  
**Sent:** Thursday, November 7, 2019 3:54 PM  
**To:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Subject:** RE: Docket 05-00293

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Oh, by the way, is this the same as Bonnie Brook or is this a different one? Bonnie Brook was also 19 homes. Same or different, how many homes have been connected at Bonnie Brook?

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**From:** Jeff Riden [<mailto:Jeff.Riden@Adenus.com>]  
**Sent:** Thursday, October 24, 2019 10:58 AM  
**To:** TPUC DocketRoom  
**Cc:** Patsy Fulton  
**Subject:** [EXTERNAL] Docket 05-00293

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Ectory –

Please replace the filing I submitted yesterday in docket 95-00293 with this one. I had the wrong Docket number listed. This filing also cleans up a couple other errors. Hard copies are in the mail.

Thanks,

Jeff

2062



**Jeff Riden**

CEO

Adenus Group, LLC | 849 Aviation Pkwy, Smyrna, TN 37167

Direct: 615.220.7171 | Toll Free: 888.4.ADENUS Ext: 145 | Mobile: 615.691.2018 | Fax: 615.220.7207

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1061

## Patsy Fulton

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**From:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Sent:** Friday, November 8, 2019 3:14 PM  
**To:** Patsy Fulton  
**Cc:** Michelle Mairs  
**Subject:** [EXTERNAL] RE: Docket 05-00293

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You didn't ask, but we know this because it's generally accepted within the industry (and among regulators) that actual residential flow is around 150-170 gpd. TWSI also has to inspect the lagoon (and all our sites) at least once a month so someone is always out to look at it at least every 30 days and they can gauge what's going on with the lagoon and flows.

Thanks,

Jeff

**From:** Patsy Fulton <Patsy.Fulton@tn.gov>  
**Sent:** Friday, November 8, 2019 2:58 PM  
**To:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Cc:** Michelle Mairs <Michelle.Mairs@tn.gov>  
**Subject:** Re: Docket 05-00293

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Jeff,

Forgive my ignorance to the lagoon situation; however, how do you know (without telemetry or any electricity hook-ups, etc. to the lagoon what the flow is to the lagoon or how much evaporation or rain there is out of the lagoon?) I know there is probably a logical explanation; however, I don't remember ever asking that question, believe it or not!

Thanks, Patsy

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**From:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Sent:** Friday, November 8, 2019 11:50 AM  
**To:** Patsy Fulton <Patsy.Fulton@tn.gov>  
**Subject:** [EXTERNAL] RE: Docket 05-00293

**Patsy Fulton**

**From:** Britton Dotson  
**Sent:** Tuesday, December 10, 2019 11:44 AM  
**To:** Jeff Riden; Brad Harris  
**Cc:** Brian Ham; Stephanie Durman; Patrick Parker; Jordan Fey; Patsy Fulton; Matthew Nicks  
**Subject:** RE: Cross Plains Lagoon

05-00293  
1063

Jeff, thank you for your response. Regarding the core testing, certainly that is relevant information; however, we have made multiple observations of rock outcropping in the base and on the sides of the excavation along with some soil profile dropouts. The evident rock outcrops may preclude the need to core test. If you establish a contractor we would appreciate an opportunity share our perspectives with them prior to their conduct of the work.

Thanks, Britton

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**From:** Jeff Riden [mailto:Jeff.Riden@Adenus.com]  
**Sent:** Tuesday, December 10, 2019 11:32 AM  
**To:** Brad Harris  
**Cc:** Britton Dotson; Brian Ham; Stephanie Durman; Patrick Parker; Jordan Fey; Patsy Fulton; Matthew Nicks  
**Subject:** [EXTERNAL] RE: Cross Plains Lagoon

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Brad –

The utility tells me they are working on the pump and haul and anticipate having a plan in place shortly. As you're no doubt aware, TDEC inspected the lagoon in 2017 specifically to determine compliance with the SOP before issuing the current permit and determined the facility to be in compliance, including the observation that it was retaining water. This along with the assertions of those involved with the construction of the lagoon that a clay liner was installed run counter to the observations of department personnel at the November inspection. Given the conflicting positions/statements on the state of the facility, the utility believes it best take the extra step to determine for everyone's peace of mind whether a liner is present. To this end, TWSI is contracting with a company to conduct core sampling within the lagoon (with the scope possibly being expanded to address other requests made by the Department in the NOV). Once the results of the core testing are known, the utility will determine the next course of action regarding the facility (either likely stay with the lagoon if the liner is present or look at alternatives for new treatment if it is not).

In response to the question about number of customers, currently there are 19 residential and 3 commercial customers connected to the system. In 2014 you sent a letter a Charles Hyatt regarding the soils area associated with the facility and noted that White House Utility District water records showed a flow to the plant of 1700 gpd. At that time in 2014, there were 19 residential and 2 commercial customers connected to the system, so there has been one additional connection in those 5 years. Point being, there is very minimal flow to the system, certainly nowhere near the contemplated design flow. It is the utility's understanding that the White House Utility District serves all the residences and commercial properties in the vicinity of the treatment facility, however the utility, I'm told, is working on plans to verify this.

In the meantime, the utility will keep you and the Department apprised of developments with the core testing, pump and haul plans, etc... as information is known.



If you have any additional questions, please feel free to direct them to Matthew Nicks – [matthew.nicks@adenus.com](mailto:matthew.nicks@adenus.com).

Thanks,

Jeff

2.10.3

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**From:** Brad Harris <Brad.Harris@tn.gov>

**Sent:** Tuesday, December 10, 2019 9:10 AM

**To:** Jeff Riden <Jeff.Riden@Adenus.com>

**Cc:** Britton Dotson <Britton.Dotson@tn.gov>; Brian Ham <Brian.Ham@tn.gov>; Stephanie Durman <Stephanie.Durman@tn.gov>; Patrick Parker <Patrick.Parker@tn.gov>; Jordan Fey <Jordan.Fey@tn.gov>; Patsy Fulton <Patsy.Fulton@tn.gov>

**Subject:** RE: Cross Plains Lagoon

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Good Morning Jeff,

I am following up on our Notice of Violation regarding the Cross Plains Treatment Facility (SOP-05057) dated November 26. In this NOV we requested that TWSI immediately discontinue discharging into this feature until a suitable form of treatment can be established. Have you been successful in accomplishing this request? Are you able to pump and haul the effluent to a different system?

Regards,



Department of  
**Environment &  
Conservation**

Brad C Harris P.E.

Division of Water Resources / William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243  
Direct (615) 532-5367 / [Brad.Harris@tn.gov](mailto:Brad.Harris@tn.gov)

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**From:** Brad Harris

**Sent:** Tuesday, November 26, 2019 10:38 AM

**To:** Jeff Riden ([Jeff.Riden@adenus.com](mailto:Jeff.Riden@adenus.com))

**Cc:** Britton Dotson; Brian Ham; Stephanie Durman; Patrick Parker; Jordan Fey; Patsy Fulton

**Subject:** Cross Plains Lagoon

Jeff,

Please see the attached NOV for the Cross Plains facility. Feel free to contact any of us on the email should you have questions regarding the content. A paper copy is being sent certified today.

Regards,



306<sup>3</sup>

**Brad C Harris P.E.**

Division of Water Resources / William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243  
Direct (615) 532-5367 / [Brad.Harris@tn.gov](mailto:Brad.Harris@tn.gov)

**Patsy Fulton**

05-00293

**From:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Sent:** Monday, December 30, 2019 1:27 PM  
**To:** Patsy Fulton  
**Cc:** David Foster; Aaron Conklin; Michelle Mairs; Matthew Nicks  
**Subject:** [EXTERNAL] Re: TWSI Cross Plains Response

1/12

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Patsy -

TWSI is contracting with a soil scientist to re-evaluate the soils on the property. I believe some level of testing was done since initial soils areas were identified (and approved by TDEC), however we have not been able to locate any testing results for soils on the other portions of the property. We hope to have this completed expeditiously.

Thanks,

Jeff

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**From:** Patsy Fulton <Patsy.Fulton@tn.gov>  
**Sent:** Monday, December 30, 2019 1:09 PM  
**To:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Cc:** David Foster <David.Foster@tn.gov>; Aaron Conklin <Aaron.Conklin@tn.gov>; Michelle Mairs <Michelle.Mairs@tn.gov>; Matthew Nicks <Matthew.Nicks@adenus.com>  
**Subject:** RE: TWSI Cross Plains Response

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Jeff,

I don't know anything about the liner "stuff"; however, should you not be "good to go" for soils with the 60 acres of land that TWSI owns for the Cross Plains wastewater system site? Understanding based on previous conversations why the drip field for the entire 75,000 lagoon would not have been installed; however, would the 60 acres not have been tested at the time to insure the soil was available when needed?

Thanks, Patsy

**From:** Jeff Riden <Jeff.Riden@Adenus.com>  
**Sent:** Monday, December 23, 2019 1:52 PM  
**To:** Brad Harris <Brad.Harris@tn.gov>  
**Cc:** Britton Dotson <Britton.Dotson@tn.gov>; George Garden <George.Garden@tn.gov>; Brian Ham <Brian.Ham@tn.gov>; Jordan Fey <Jordan.Fey@tn.gov>; Patsy Fulton <Patsy.Fulton@tn.gov>; Matthew Nicks <Matthew.Nicks@adenus.com>; Billy Dranes <Billy.Dranes@adenus.com>; Marshall Fall <marshall.fall@adenus.com>;

Stephanie Durman <Stephanie.Durman@tn.gov>; Patrick Parker <Patrick.Parker@tn.gov>

**Subject:** [EXTERNAL] TWSI Cross Plains Response

2/12

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Brad –

Please see attached for TWSI's response to the Cross Plains NOV. Please direct any questions/comments to Matt Nicks at [matthew.nicks@adenus.com](mailto:matthew.nicks@adenus.com) or 615-220-7200.

Thanks,

Jeff



**Jeff Ridsen**

CEO

Adenus Group, LLC | 849 Aviation Pkwy, Smyrna, TN 37167

Direct: 615.220.7171 | Toll Free: 888.4.ADENUS Ext: 145 | Mobile: 615.691.2018 | Fax: 615.220.7207

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