

Patsy Fulton

From: Jeff Riden <Jeff.Riden@Adenus.com>
Sent: Monday, December 23, 2019 1:52 PM
To: Brad Harris
Cc: Britton Dotson; George Garden; Brian Ham; Jordan Fey; Patsy Fulton; Matthew Nicks; Billy Dranes; Marshall Fall; Stephanie Durman; Patrick Parker
Subject: [EXTERNAL] TWSI Cross Plains Response
Attachments: TWSI Cross Plains NOV Response.pdf

05-00293
1st

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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 or 615-220-7200.

Thanks,

Jeff

Adenus

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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851 Aviation Parkway
Smyrna, TN 37167

December 23, 2019

Brad Harris
Tennessee Department of Environment and Conservation
Division of Water Resources
Nashville Environmental Field Office
711 R.S. Gass Blvd.
Nashville, TN 37216

VIA EMAIL: Brad.Harris@tn.gov

Re: Notice of Violation
Cross Plains Treatment Facility
UIC Number ROB 0000023 and SOP-05057

Mr. Harris:

This letter is in response to the Notice of Violation (NOV) issued to Tennessee Wastewater Systems, Inc. ("TWSI") on November 26, 2019 related to the Cross Plains Treatment Facility in Robertson County, Tennessee. On December 10, 2019 you sent a follow up email requesting an update as to any action taken by TWSI related to the requested corrective actions listed in the NOV. TWSI responded to that email with a brief update and now supplements that update with the following:

While TWSI disputes the alleged violations and characterization of the treatment facility as stated in the NOV, the utility lacks information from which to form an informed opinion about the actual construction of the facility. It appears from discrepancies within the Department's own records it too lacks certain necessary information, unable to be obtained from simple "observations" or Google Earth photos, to accurately assess the facility as well.

As strongly as Department personnel believe no liner exists, there are those with the utility that were involved in the construction of the facility that attest to the presence of a liner. Further, TDEC previously inspected the facility in 2014 and 2017, the last time specifically to determine compliance with the SOP, and both inspections, as detailed in the respective inspection reports, found the system to be in compliance and holding water. These results of these inspections are contrary to the most recent inspection of the facility on November 26, even though no work has been done or additional connections made to the facility in the intervening two years.

For the purpose of determining the condition of the lagoon – and as mentioned in TWSI's response to your December 10th email - TWSI has finalized plans with a third party contractor to perform core sampling within the lagoon to determine the presence of a clay liner. The contractor will also conduct a domestic water supply well study within a 2 mile radius of the lagoon. TWSI anticipates this work to be complete and a report provided to it within the next 4-6 weeks. TWSI will provide a copy of the report to the Department upon receipt. If the results of these studies warrant, the contractor will also perform the requested dye trace study.



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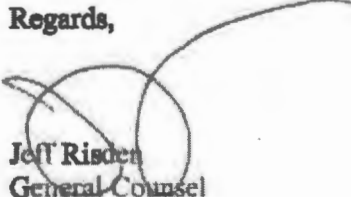
851 Aviation Parkway
Smyrna, TN 37167

In addition to the third party studies, TWSI will be submitting plans to modify the facility temporarily to allow for the pumping of the effluent from the residences and businesses connected to the system. It is anticipated these plans along with any additional documentation to modify the SOP, will be submitted to the Department within 60 days. TWSI will also begin soils work to identify possible areas for additional drip disposal.

Once the studies are complete and results analyzed, TWSI will address any long term adjustments to the facility, should they be necessary, to continue providing service to the Cross Plains area.

If you have any further questions or concerns, please contact Matthew Nicks at matthew.nicks@adenus.com or 615-220-7700.

Regards,


Jeff Riden
General Counsel

Cc: Billy Dranes – billy.dranes@adenus.com
Matthew Nicks – matthew.nicks@adenus.com
Marshall Fall – marshall.fall@adenus.com
Britton Dotson – britton.dotson@tn.gov
Stephanie Durman – stephanie.durman@tn.gov
Patrick Parker – patrick.parker@tn.gov
Brian Ham – brian.ham@tn.gov
Jordan Fey – jordan.fey@tn.gov
George Garden – george.garden@tn.gov
Patsy Fulton – patsy.fulton@tn.gov