

Docket
14-0000000000

Monthly Update
31-Aug-15

Wastewater Location	Date Complaint /Repair Needed	Complaint	Date added to Report	Explain Repairs/Improvements Planned	Explain Repairs/Improvements in Progress	Money Expended	Manner to be funded	Estimated Complete Date	Date Completed	Final Costs
Cedar Hill			9/29/2014	see Docket 14-00136						
Maple Green			9/29/2014	see Docket 14-00136						
Summit View				see Docket 14-00136						
Smokey Village				see Docket 14-00136						
Star Crest	11/17/2014	E Coll limits not met	11/30/2014	Fencing Required	Fence Installed, Drip installed			6000	8/31/2015	8/17/2015 *
Star Crest II	11/17/2014	E Coll limits not met	11/30/2014	Fencing Required	Fence Installed			1800	2/21/2015	2/20/2015
Townsend Town Sq.	11/17/2014	E Coll limits not met	11/30/2014	Fencing Required	Fence Installed			15000	3/1/2015	1/15/2015
Legacy Mtn East	10/1/2014	E Coll limits not met	10/30/2014	Fencing Required	Fence Installed				10/30/2014	1770

* Final Cost not determined yet.



851 Aviation Parkway
 Smyrna, TN 37167

August 19, 2015

Mr. Alan Rather
 Division of Water Resources
 Department of Environment and Conservation
 William R. Snodgrass Tennessee Tower
 312 Rosa Parks Avenue, 11th Floor
 Nashville, TN 37243

RE: Compliance Inspections 7/20/2015
 SOP-05033 Smoky Village Subdivision, Sevier County
 SOP-00019 Starr Crest Resort, Sevier County
 SOP-01033 Starr Crest II Resorts, Sevier County
 SOP-98033 Swan Harbour Subdivision, Roane County
 SOP-99024 Tall Oak Subdivision, Blount County
 SOP-99016 Townsend Town Square, Blount County

Dear Mr. Rather:

On July 20, 2015, your office conducted compliance inspections of the facilities referenced above. Although it is customary for Adenus management staff to accompany you on your inspections to facilitate compliance with SOP requirements, we had engaged in a previous telephone call where I informed you no management staff would be available that day to accompany you but you were unable to reschedule your inspections for another date. Therefore, some of your questions and concerns were not able to be addressed during your site inspections. Since your compliance inspection reports included several comments about your findings at each of the facilities, this letter provides a response to those comments.

Smoky Village Subdivision, Sevier County

7/20/15 Ponding was observed at the site. Evidence of past overflows from the site were noted. The drip field has areas of moist soil but is dry enough to mow. Nearby acreage is under contract to be used for an additional drip field. The financing and installation is currently under review by the Tennessee Regulatory Authority (TRA).

Starr Crest Resort, Sevier County

On 7/20/15 a site inspection was conducted to determine if corrective action had been done. Several drip lines had been replaced. They were on top of the ground and not installed on

contour. These pipes were causing ponding in the drip field resulting in overflow from the site. These drip lines depicted in your photos were installed last year as a temporary measure only to provide an adequate volume of effluent discharge until a new drip field could be installed underground at the same disposal site as the existing field. Please note that in the past drip tubing was permitted to be installed aboveground. Since your inspection of July 20, 2015, installation of a completely new, on-contour underground drip field was completed on August 14, 2015. This drip field now includes a discharge flush circuit that ensures proper volume and pressure of dispersed effluent. Further improvements and new equipment were added to the existing control, filtering and metering processes which were just upgraded several years ago. Lastly, the installation of a four strand barbed wire fence was completed on July 28, 2015 so that we may remove the need for disinfection and the E. Coli limitation on the existing permit.

Starr Crest II Resorts, Sevier County

On 7/20/15 a site inspection was conducted to determine if the system has been brought into compliance. There was evidence that the system had overflowed from the tanks as previously noted, however on the day of the inspection, no overflow from the tanks were observed. Broken /chewed pipes were noted causing effluent to flow into a drain. It is common for drip tubes that are laying on the surface or in the duff layer of heavily forested areas of this region to be broken due to falling trees and to be chewed on by small animals and black bears. Thus, the discovery and repair of these damaged tubes are an ongoing maintenance item and are normally inspected during the monthly site visits with repairs performed soon afterwards. The broken pipe referenced in the photo accompanying your report has been repaired. Technicians also found two more small chewed sections and repaired those also. Please see photos #1, #2 and #3 for documentation.

The area has been fenced but is still in violation of the SOP. Although not noted in your report, UV disinfection was added in 2014 to this site. Also, in addition to the UV disinfection units that were added, we have installed a four strand barbed wire fence around the drip field and have submitted an application to modify the SOP to remove the E. Coli and disinfection requirement.

Swan Harbour Subdivision, Roane County

The area needs mowing. This drip field is maintained with a rotary brush cutter three times during the growing season and was already scheduled for its second cutting of the season the following week. This cutting has been completed and one more is scheduled in October.

Ponding was observed at a valve box. It appears that the pipe/valve is broken and allowing effluent to pond in that area. Ponding was observed at the same location on Dec. 21, 2010 site visit.

Since the SOP for this facility states that all "instances of ponding or pools under dry weather conditions shall be promptly investigated and remedied", the ponding you noted has already been

under observation to reveal if the ponding still existed under dry weather conditions. Repeated long term observation of this area on a monthly basis strongly suggested these three existing depressions were filled with stormwater following a rainfall. When this site was inspected one week later, two of the three depressions were completely dry (see photos #4 and #5). The third depression still had some water in it (see photo #6) so technicians further investigated and made repairs to a cracked discharge return line (see photo #7). We will continue to investigate any further instances of ponding at this site and shall promptly remedy any ponding due to broken pipes or tubing.

Tall Oak Subdivision

Site re-inspection was done to determine compliance with the SOP. Several orifices were exposed on the recirculation sand filter. This was previously noted in the August 15, 2014 inspection.

It is our understanding that exposed orifices on the sand filter are not a violation of the SOP. However, more gravel will be added to ensure all orifices are completely below the surface.

An area of ponding was observed on the lower portion of the drip field located at 35°48'18.4/-83°50'00.00". Ponding was previously observed on the February 28, 2014 inspection conducted by KFFO staff and & August 15, 2014 as well.

The several areas of ponding that were noted on last year's inspection were addressed by making repairs to leaking drip tubing. While we do not believe this ponding is due to last year's leak, but rather due to a new leak, this new ponding was evaluated and the broken drip tubing that was contributing to it was repaired on August 4, 2015 (see photo #8).

Excessive vegetation was observed over the entire drip field making a complete evaluation of the site difficult.

This drip field is maintained with a rotary brush cutter three times during the growing season and was already scheduled for its second cutting of the season the following week. This cutting has been completed and one more is scheduled in October.

Townsend Town Square

On 7/20/2015 A site inspection was done to determine what progress, if any, has been made at the site. The area has been fenced, no signs were observed at the drip field. The treatment plant underwent considerable improvements in December 2014, which included upgraded pumping, filtering and flow control equipment as well as more sophisticated control and monitoring hardware and software. This site can now be monitored and controlled through the internet. A sign has been installed on the fence of the drip field.

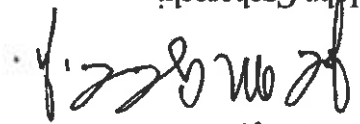
Ponding was still observed. However, there was no overflow to the road ditch at this time. In addition to the improvements constructed at the treatment plant, a new drip field has been installed to replace the existing one. The new drip field includes a discharge flush circuit that ensures proper volume and pressure of dispersed effluent. Stormwater runoff from the

downspouts of the adjacent commercial building has now been diverted from entering the drip field and instead directed toward that property's stormwater retention pond. Although we do not believe any observed ponding was due to leaks in the drip tubes, we will promptly investigate any ponding at this site and make any needed repairs due damaged drip tubes.

Excessive vegetation was observed at the time of inspection. The area needs mowing to allow for proper inspections of the site by the management entity.
This drip field is maintained with a rotary brush cutter three times during the growing season and was already scheduled for its second cutting of the season the following week. This cutting has been completed and one more is scheduled in October.

I will provide follow-up documentation when the work is completed at Smoky Village and Tall Oak. Please let me know if anything further is needed.

Sincerely,



John Czahorowski

Operations & Maintenance Manager

Photo #1



Photo #2



Photo #3



Photo #4



Photo #5



Photo #6



Photo #7



Photo #8

