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August 21, 2014

David Foster, Chief
Utilities Division
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243

RE: First Data Request response
Docket No. 14-00072


Dear Mr. Foster:

At your request, please find attached the Integrated Resource Management, Inc., response to the First Data Request.

IRM hopes that these responses are to your satisfaction. If you have any further questions, please let me know.

Very truly yours,

FARRIS BOBANGO PLC



Charles B. Welch, Jr.

Attachment:
cc: Jeffrey W. Cox, Sr.

**FIRST DATA REQUEST ISSUED BY TRA STAFF
TO INTEGRATED RESOURCE MANAGEMENT, INC.
TRA DOCKET NO. 14-00072
AUGUST 21, 2014**

1. How many wastewater systems does Integrated Resource Management, Inc. ("IRM") have certified at this time that are subject to regulation by the TRA?

Answer: Fourteen (14)

2. How many wastewater systems does IRM have in operation at this time that are subject to regulation by the TRA?

Answer: Twelve (12)

3. If IRM has more certificated systems identified in response to question no.1, above, than operating systems identified in response to question no. 2, above, please provide an estimated time-frame when each non-operating system will become operational.

Answer: Docket 11-00081-Genesis Village Estates, Cumberland County:
The developer/owner has not installed the system and IRM will complete the system upon receiving funds for such. Completion should take two months.

Docket 07-008 – Ashley Meadows, Blount County:
The system was installed and ready for use in late 2008. There are no customers.

4. Are all of the operating wastewater systems identified in response to question no. 2, above, presently in compliance with the permitting requirements and related rules and regulations administered by the Tennessee Department of Environment and Conservation ("TDEC")? If any such system is currently not in compliance with any of TDEC's rules and regulations, please describe in detail each such instance of noncompliance for each such system.

Answer: Docket 11-00081-Genesis Village Estates, Cumberland County:
At this time TDEC has not issued any Notice of Violation or Notice of Non Compliance with regard to this property. The developers have built and sold properties and are operating their own pump and haul activities. IRM notified the owners to cease the activities and has applied for the pump and haul permit.

5. Has TDEC issued any notice of violations since January 1, 2010 for any of the operating wastewater systems identified in response to question no. 2, above? If so, please provide a copy of each such notice and any written response by IRM.

Answer: No

6. Has TDEC instituted an enforcement action against IRM since January 1, 2010 involving any of the operating wastewater systems identified in response to no. 2, above? If so, for each such enforcement action please provide a copy of all TDEC orders and all written responses by IRM.

Answer: No

7. For each operating wastewater system identified in response to question no. 2, above, please provide a copy of the most recent inspection report submitted to TDEC.

Answer: A copy of IRM's 2013 Annual Operations and Maintenance Report is attached indicating there is no activity at Ashley Meadows and is Attached in Exhibit A.

IRM sent TDEC a compliance schedule for Genesis Village Estates on April 15, 2014 and is included in Exhibit B.

8. Is any of the operating wastewater systems identified in response to question no. 2, above, presently in need of any maintenance or repairs costing in excess of \$10,000 in order to maintain compliance with TDEC's permitting requirements or to ensure continued and adequate wastewater services to customers? If so, for each such system please describe in detail each such maintenance or repairs, as well as the planned source of funding to pay for the maintenance or repairs.

Answer: Ashley Meadows; No, the property was foreclosed from the developer of Ashley Meadows. The Blount County Health Department, Environmental division is issuing individual site systems. IRM is working with Capital Bank to remove the wastewater system. The TRA will be notified upon such final action.

9. Does IRM anticipate that any of the operating wastewater systems identified in response to question no. 2, above, will need any maintenance or repairs costing in excess of \$10,000 within the next two years from the date of this data request? If so, for each such system please describe in detail each such anticipated maintenance or repairs, as well as the planned source of funding to pay for the maintenance or repairs.

Answer: No

10. The Petition in this docket states that IRM's annual revenue is \$108, 574 as reported in the most recent UD20 Form filed with the TRA. Please describe in detail all actions taken by or on behalf of IRM, if any, to obtain a financial security in the form prescribed by TRA Rule 1220-4-13-.07(3) in the amount of at least \$108, 574.

Answer: Applications are being made to appropriate institutions for the required financial security.

11. The Petition filed in this docket proposes to offer as an alternative security letter of credit in the amount of \$95,000, which according to the Petition constitutes 88% of IRM's annual revenue of \$108,574 as reported in its most recent UD20 Form filed with the TRA. IRM presently has in place as its financial security a \$95,000 Irrevocable Letter of Credit with a maturity date of September 23, 2014, issued in favor of the TRA by Central Bank of Savannah, Tennessee. On July 23, 2014, the TRA received a letter from Central Bank informing the TRA that its Irrevocable Letter of Credit will not be renewed and will be cancelled on the maturity date. A copy of this letter is attached hereto.

11(A) Does IRM plan to replace the letter issued by Central bank with an irrevocable letter of credit issued by another institution?

Answer: Yes. IRM is taking action to secure a replacement Letter of Credit or for Bonding.

11(B) If the answer to question 11.A above, is in the affirmative, please describe in detail all actions that have been taken or will be taken to secure a replacement irrevocable letter of credit in the amount of at least \$95,000 to be issued on or before September 23, 2014. Please provide all documentation that supports your response to this question.

Answer: IRM is still working other bank(s) to secure a replacement Letter of Credit.

11 (c). If the answer to question 11.A above is in the negative, please describe in detail how IRM plans to proceed in this docket in light of the relief requested in the Petition for the TRA "to approve and accept a letter of credit of \$95,000.00 as sufficient financial security to comply with the Authority's rules." Please provide all documentation that supports your response to this question.

Answer: N/A.



Operation and Maintenance Inspection Schedule

**Pursuant to the Tennessee Department of Environment and Conservation
Division of Water Pollution Control, State Operating Permit Program**

Prepared for Current: Division of Water Resources, Permit Section

Annual Report for 2013

Integrated Resource Management, Inc.

A Privately Owned Public Utility

P.O. Box 642

3444 Saint Andrews Drive

White Pine, Tennessee 37890

Phone (Vol) 674-0828

Facsimile (Vol) 674-2352

Toll Free (877) 746-2910

EXHIBIT

A



Integrated Resource Management, Inc.

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April 1, 2014

Woodson L. Smith
Division of Water Pollution Control
State of Tennessee Department of Environment and Conservation
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, Tennessee 37921

**RE: Annual Report 2013
Operation Maintenance Monitoring Annual Report 2013**

Permit No. SOP 02-012
Cove Mountain Realty
Sevier County, Tennessee

Permit No. 04-012
Emory Pointe
Roane County, Tennessee

Permit No. 01-003
Lost Creek
Union County, Tennessee

Permit No. 04-067
Wild Briar
Sevier County, Tennessee

Permit No. 06-001
Mountain Shangrila
Sevier County

Permit No. SOP 03-012
Valley Mart Exxon
Sevier County, Tennessee

Permit No. 04-027
Compass Pointe
Blount County, Tennessee

Permit No. 05-054
Sterling Springs
Sevier County, Tennessee

Permit No. 06-039
Flat Hollow
Campbell County, Tennessee

Permit No. 08-013
Cove Creek Resort
Sevier County

Dear Mr. Smith,

Enclosed are updated spreadsheets reporting analysis for the facilities listed above. Actual analysis certificates and Chain-of-Custody forms are available at your request. IRM Utility, Inc. ("IRM") has noted on the Chain-of-Custody form and to the laboratory that results of "None Detected or ND" will not be acceptable results in the future. IRM will be glad to supply any additional information upon your request. Attached are the analysis summaries for the facilities listed above. Below is a summary discussion for each system for the year 2013:

Cove Mountain SOP# 02012

Observations; The system is working well. The event in 2011 of the rental laundry washing bathroom floor mats that broke apart and flowed through the system.

Actions and Management; IRM cleaned filters often in 2012 and resilient fibers still moved through the system into the recirculation pump chambers. The recirculation tanks were pumped in January of 2013 to get the fibers that had migrated into the recirculation tank. The tank was pumped by a Permitted Pumper, Darrel Goode of Newport, Tennessee. Disposal was at an approved POTW.

Since the pumping the filters have needed cleaned. The French drain system the owners put up-gradient of the system appears to need maintenance at the outlet portion of the system. We have noticed some I&I at the gravity recirculation device. The infiltration is brief during high rain events and the disposal fields have handled the extra flow. The water use is well below design limits of 2000 gpd and is 200 to 400 gpd. Verbal recommendations have been made to the client's on-site maintenance crew to keep the outlet of the French drain system clear. If the problem persists a material called Infi-Shield made by Sealing Solutions, Inc. that is excellent for sealing externally from inside around man-holes, risers, etc. IRM has this in stock and will use if needed.

Valley Mart Exxon SOP# 03012

Observations; The system mechanically is working well. The recirculation device that was supposed to supply 100% recirculation during low flows would stick in 100% recirculation from time to time and cause high alarms and the need for immediate service. This was utilized initially to provide added treatment and retention time in the recirculation. This feature had to be abandoned due to the frequency of emergency service calls. The theoretic recirculation of the device is now as proposed by the manufacturer design with the split to be as in the typical systems without the 100% option.

Compaction of the soils in the drip field has occurred due to mowing of the area with heavy commercial mowers on a contractual basis whether it was rainy or not. The mowing occurred with the grain or parallel to the drip lines. Tire marks are evident over the lines in areas.

Corrective Actions; Verbal recommendations have been made to the client's on-site maintenance crew to mow with small hand mowers during dry times only and not a weekly action if rainy conditions exist. Mowing will be against the grain or perpendicular to the drip line lay out. In mid-summer or very dry conditions, IRM will have IRM-C&C Company run the vibratory plow beside the existing lines to improve structure if needed.

History; It was observed that the recirculation media has developed colonies of encapsulated organism colonies that tend to blanket the fixed film media and create anoxic cover much like an umbrella. The BOD₅ has increased slowly after the last media replacement. IRM has monitored the influent BOD₅ and do contend the loading is practical. IRM contacted the manufacturer that warrants the media for ten years and at this time they refused to provide additional replacement media. The manufacturer was requested to review the process in July of 2010 and has been unable to review the

process. The manufacturer offered to perform sampling with an auto sampler but never performed this. IRM has taken additional samples of the effluent entering the recirculation tank from the septic tank in 2012 & 2013 and will report the results to the manufacturer. The manufacturer has still not replaced the warranted media.

Actions and Management; Although the manufacturer will not provide the replacement media, IRM will insist that the manufacturer provide additional recommendations. The manufacturer has recommended a product called Line Blaster manufactured by Line Blaster, Inc. which has an Environmental Hazard rating as "None". This product is being used and the continued monitoring of the system will determine its success. Since the Tennessee Valley Authority ash spill in Roane County occurred, Emory Point subdivision has little growth and little anticipated growth of adding additional customers. The third phase of treatment pods that were not in use had additional treatment media. This media was used to place in the system at Valley Mart to replace volume and surface area of the media that was weighted down by the heavy growth.

IRM feels confident this product is working. The high BOD₅ has been above the Permit limits. With further review of the average flows of 365 gallons per day ("gpd") versus the permitted flows of 2000 gpd in relation to existing BOD₅ loading and the permitted total loading, IRM contends that there is not a situation which is harmful to the "Waters of the State".

Emory Pointe SOP# 04-012

Observations; The system is working well. The major concern is the occasional freezing of the spin filter and sampling port basin. This has not been a problem with the last two warm winter seasons.

Actions and Management; The area has been covered and insulated. IRM has needed to clean the transducers that measure levels in the tank and operates the alarms and timer over-ride features. There was one leak in the drip area that was easily repaired. The leaks appeared to be from moles or meadow voles chewing on the lines. The ash spill has halted growth of residences in the subdivision.

Compass Pointe SOP# 04-027

Observations; The system is working well. The major concern is occasional recirculation device malfunction. The system is serving 5 homes. There are two families in the subdivision, 1 of the homes has a single couple in it, 1 is occupied by a single retired widow, and 1 is in bankruptcy and unoccupied. Much of the time the low level cut off is actuated in the drip field dosing tank and there is no effluent for sampling. Some of the residents are gone during the winter months. That is why no analysis is reported on the first and second quarter for 2013.

Actions and Management; IRM only has an 8 hour retention time for the bacterial analysis. Therefore, the sampling cannot occur in the evening during the highest flows. In 2014 the dosing system will be turned off the day before so there is some build-up in the dosing tank prior to sampling on the next day. This hopefully will assure effluent for sampling, but, will add an extra trip including added labor, and mileage.

Lost Creek SOP# 01-003

Observations; The system is working well. The e-coli counts were high every other time of analysis. The uV bulb was in good shape but it appears that the sampling port may have been flushed for a normal effluent sampling. This will be looked at closely in the first quarter of 2014. The sand filter needed manual weeding a few times in 2013. This was likely due to the weather being a good growing season.

Actions and Management; The weeding was performed manually without the use of pesticides. Replacement uV bulbs are in stock and will be replaced if the first quarter analysis is high.

Sterling Springs SOP# 05-054

Observations; The system is working well. The e-coli counts were high for two periods in 2012 and were acceptable in 2013. The corrective treatment was effective. The property was foreclosed on by the bank. The developer installed only the first phase of the system and the bank refused to build the second phase of the system. The flows monitored are less than the system capacity at this time and the system is working within the design capacity of the system.

This sub-division has fifty customers and IRM contended it was time to analyze flow volumes coming to the plant. There have only been a few units added to the system in 2013.

Actions and Management; The average daily use of the system is 3000-4000 gpd. The highest daily flow was 7,134 gpd on Memorial Day. The first phase has the capacity for 12,600 gpd. IRM Utility, Inc. has imposed a restriction of 1 to 2 bedroom units for the future and will continue monitoring the capacity.

The ultra-violet unit was totally replaced with a new unit. Solenoid valves were employed with the controller that was needed for the flow metering device. This system is more reliable than the indexing valves that were performing the rotation of drip zones.

Wild Briar SOP# 04-067

Observations; The system is working well. The sample as reported in the second quarter had a slightly high BOD₅ of 46.8 mg/l. There have been 6-8 new cabin units built and added to this facility. The e-coli analysis is running high although the bulb was replaced.

Actions and Management; Due to the increase in cabin units, additional treatment units have been put on line for better treatment.

The crystal scrubber was damaged on the uV disinfection unit and repaired. A total over haul of the uV unit will be performed if the first quarter analysis illustrates high values. Sampling and analysis will be performed monthly after the upgrade until confirmation of good performance is made if needed.

Due to the fact that this flow is low in relationship to the large system which is designed for 24,000 gpd and irrigated in the broad acreage, with and the drip irrigation sites are very remote, there is not a situation which is harmful to the "Waters of the State" or human health.

Flat Hollow SOP# 06-039

Observations; The system is working well. The telemetry notified IRM of power outages many times in 2013. The power outages are typically during thunder storms and only durations of two to three hours. During bereavement of the Operator's Mother's death, inadvertently, sampling was missed in the third quarter. All analytical parameters were met during the year.

Actions and Management; The increased cleaning and management of the uV disinfection crystal appears to be effective and subsequent counts improved. The STEP system floats are set to allow freeboard to collect flows for 24-48 hours. When homes are without power, typically less water is used. The operation of the system was maintained and monitored by computer based telemetry continuously.

Mountain Shangrila SOP# 06-001

Observations; The system is working well. Transducers on this site indicate alarms and regulate timer override pump starts. IRM received messages by telemetry.

Actions and Management; The system was running well. The transducers needed cleaned. Normal routine visits are being made.

Cove Creek Resort SOP# 08-0013

Observations; The system is working well. There was an anomaly with the BOD₅ analysis for the fourth quarter of 2012. All parameters are within limits in 2013 with the exception of a slightly-high e-coli reading in the fourth quarter. The collection system has needed management and flood control has trained a manager on-site to disable electric panels during suspect high water.

Actions and Management; Managers of Cove Creek Resort have been notified about capping service connects prior to high water conditions to eliminate Inflow and Infiltration issues. The uV bulb will be checked if the first quarter reading is high in 2014. IRM has replacement bulbs in stock if needed. No additional management other than routine maintenance is needed at this time.

Ashley Meadows, Blount County, SOP# 07-0006

No customers this time.

Landing at River's Edge SOP# 07-0056

Construction not completed.

Moutainscape SOP# 07-0080

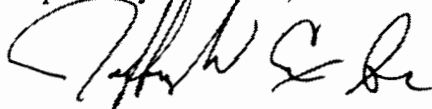
Construction not completed.

Lighthouse Pointe SOP# 10-047

Construction not completed.

I hope this summary has been helpful. IRM will provide the summary annually.

Respectfully submitted,



Jeffrey W. Cox, Sr.

Monitoring Spreadsheet
Site Cove Mountain Realty
SOP # 02012
Address 3202 Wears Valley Road
 Sevierville, TN 37862
 Full Year 2013

Design Flow (gals/day)		2000	Build Out < 15%				
Parameters Required By Permit		Date	Reading Off Monthly Bill (consumption)	Days In Billing Period	Water Use (Daily Avg) 2000	BOD5 mg/l 45	NH3-N Report
Limit	Fenced						
1st Quarter		1/13/2013	89	33	270		
		2/14/2013	77	29	266		
		3/14/2013	93	29	321		
Microbac		4/5/2013				4.8	1.07
2nd Quarter		4/16/2013	120	33	364		
		5/14/2013	87	28	311		
		6/17/2013	102	31	329		
Microbac		6/12/2013				ND	ND
3rd Quarter		7/15/2013	105.7	28	378		
		8/14/2013	112	30	373		
		9/15/2013	127	31	410		
Microbac		9/23/2013				ND	ND
4th Quarter		10/15/2013	95	29	328		
		11/14/2013	85	29	293		
		12/16/2013	73	32	228		
Microbac		12/12/13				ND	0.15

Monitoring Spreadsheet

Full Year 2013

Site Valley Mart Exxon
SOP # 03012
Address 3201 Wears Valley Road
Sevierville, TN 37862

		Design Flow (gals/day)	2000	Build Out < 25%		
Parameters Required By Permit	Date	Reading Off Monthly Bill (consumption)	Days In Billing Period	Water Use (Daily Avg) 2000	BOD5 mg/l 45	NH3-N Report
Limit						
1st Quarter	1/13/2013	115	33	348		
	2/14/2013	111	29	383		
	3/14/2013	83	29	286		
Microbac	4/5/2013				331	95.1
2nd Quarter	4/16/2013	90	33	273		
	5/14/2013	68	28	243		
	6/17/2013	107	31	345		
Microbac	6/12/2013				119	17
3rd Quarter	7/15/2013	132	28	471		
	8/14/2013	101.8	30	339		
	9/15/2013	105	31	339		
Microbac	9/23/2013				48.1	95
4th Quarter	10/15/2013	107	29	369		
	11/14/2013	138	29	476		
	12/16/2013	73.6	32	230		
Microbac	12/12/2013				64.5	110
		123140 Yearly Total	362 Days	340.17 Daily Average		

**Monitoring Spreadsheet
Full Year 2013**

Site **Emory Pointe**
SOP # **04-012**
Address **Roane County**

Design Flow (gals/day) 25250 Build Out < 5%

Parameters Required By Permit	Date	Water Use	BOD5	NH3-N
Fenced		Daily Estimate gpd	mg/l 45	Report
1st Quarter				
Microbac	4/4/2013	<3000	4.5	27.9
2nd Quarter				
Microbac	6/13/2013	<3000	4.9	30
3rd Quarter				
Microbac	9/30/2013	<3000	2.8	0.27
4th Quarter				
Microbac	12/23/2013	<3000	11	26.3

Site is fenced

Site
SOP #
Address

Compass Pointe
04-027
Blount County

Design Flow (gals/day) 3500 Build Out <33%

Parameters Required By Permit	Date	Water Use	BOD5	NH3-N	E.Coli
		(Daily Avg) gpd	mg/l	Report	941/100ml
		Water Bills			

1st Quarter

Microbac		gallons days	<1200	Low Flow Levels No Sample Available Most Residents Absent	
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2nd Quarter

Microbac		gallons days	0	<1200	Low Flow Levels No Sample Available Most Residents Absent
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3rd Quarter

Microbac	9/30/2013	gallons days	0	<1200	11.4	2.1	1400
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4th Quarter

Microbac	12/23/2013	gallons days	0	<1200	14.50	23.3	>2420
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Low Dosing Levels

Monitoring Spreadsheet

Full Year 2013

Site

Lost Creek

SOP #

01-003

Address

Union County

Design Flow (gals/day)

5000

Build Out < 25%

Parameters Required By Permit

Date

Water Use

(Daily Avg)
gpd

NO3-N
Report

BOD5
mg/l
45

NH3-N
Report

E.Coli
941/100ml

Meter

1st Quarter

Microbac

4/4/2013

gallons
days

23,800
86

277

18.4

3.6

8.64

6

2nd Quarter

Microbac

6/13/2013

gallons
days

28,800
58

497

11.5

10.7

36

>2420

3rd Quarter

Microbac

9/30/2013

gallons
days

24,800
118

210

41.7

10.4

23

650

4th Quarter

Microbac

12/23/2013

gallons
days

22,600
84

269

10.6

35.6

>2420
(light seemed to be working fine)

**Monitoring Spreadsheet
Full Year**

Site **Sterling Springs**
SOP # **05-054**
Address **Sevier County**

Parameters Required By Permit		Date	Water Use (Daily Avg)	BOD5 mg/l 45	NH3-N Report	E.Coli 941/100ml Very Restricted Access
1st Quarter Microbac	1/2/2013		<12,000	38.7	22.5	690
2nd Quarter Microbac	4/5/2013		<12,000	8.1	4.05	ND
3rd Quarter Microbac	9/30/2013		<12,000	4.6	13	3
4th Quarter Microbac	12/12/2013		<12,000	11	18	5

Average GPD 3,734 with highest single day volume day of 7,134 on Memorial Day

The Ultra-violet Light System was replaced early in 2013.

**Monitoring Spreadsheet
Full Year 2013**

Site **Wild Briar**
SOP # **04-067**
Address **Sevier County**

Design Flow (gals/day) 25200 Build Out <20%

Parameters Required By Permit		Date	Water Use	Estimated (Daily Avg) gpd	BOD₅ mg/l 45	NH₃-N Report	E.Coli 941/100ml Limited Access Area
1st Quarter							
Microbac	4/5/2013	gallons days	0	<5000	40.5	26.7	>2420
2nd Quarter							
Microbac	6/12/2013	gallons days	0	<5000	46.8	18	>2420
3rd Quarter							
Microbac	9/23/2013	gallons days	0	<5000	4.2	17	13
4th Quarter							
Microbac	12/12/2013	gallons days	0	<5000	51	60	>2420

Monitoring Spreadsheet**Full Year 2013****Site****Flat Hollow****SOP #****06-039****Address****Campbell County****Design Flow (gals/day) 6000****Build Out 90%****Parameters Required By Permit****Telemetry
Report
Calculated
gpd****NO₃-N
Report****BOD₅
mg/l
45****NH₃-N
Report****E.Coli
941/100ml****1st Quarter****Microbac****1/3/2013****200****42.8****9.7****4.49****110****2nd Quarter****Microbac****4/4/2013****1700****55****2.6****0.293****65****Meter Reading****3rd Quarter****Microbac****6100****Meter Reading****4th Quarter****Microbac****12/16/2013****4500****44.8****13.9****4.2****350**

Monitoring Spreadsheet

Full Year 2013

Site Mountain Shangrila
SOP # 06-001
Address Sevier County

Design Flow (gals/day) 16000 Build Out <10%

Parameters Required By Permit		Date	Water Use (Daily Avg) gpd Wells Estimate	Total N	NO3-N Report	BOD5 mg/l 45	NH3-N Report	E.Coli 941/100ml
1st Quarter								
Microbac	4/5/2013	gallons days	<1600	43.7	49.6	ND	2.01	ND
2nd Quarter								
Microbac	6/12/2013	gallons days	<1600	43.9	41.8	ND	0.7	ND
3rd Quarter								
Microbac	9/23/2013	gallons days	<1600	Not Required	33.7	ND	ND	ND
4th Quarter								
Microbac	12/12/2013	gallons	<1600	Not Required	31.8	ND	0.27	ND

Monitoring Spreadsheet

Full Year 2013

Site Cove Creek RV
SOP # 08-0013
Address Sevier County

Design Flow (gals/day)

17385

Build Out < 15%

Parameters Required By Permit		Date	Reading Off Monthly Bill (consumption)	Days In Billing Period	Water Use (Daily Avg) 2000	NO3-N Report	BOD5 mg/l 45	NH3-N Report	E.Coli 941/100ml
1st Quarter		1/13/2013	365	33	1106				
		2/14/2013	219	29	755				
		3/14/2013	343	29	1183				
Microbac	4/5/2013					0.043	9.5	3.79	2
2nd Quarter		4/16/2013	786	33	2382				
		5/14/2013	466	28	1664				
		6/17/2013	675	31	2177				
Microbac	6/12/2013					0.848	9.8	17	120
3rd Quarter		7/15/2013	564	28	2014				
		8/14/2013	482	31	1555				
		9/15/2013	455	31	1468				
Microbac	9/23/2013					3.17	3	17	ND
4th Quarter		10/15/2013	740	29	2552				
		11/14/2013	788	30	2627				
		12/16/2013	811	32	2534				
Microbac	12/12/2013					0.097	7.3	32	980



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Phone (Vol) 674-0828

Facsimile (Vol) 674-2352

Toll Free (877) 746-2910

April 15, 2014

Brad C. Harris, PE
Manager Land Based Systems
Division of Water Resources
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

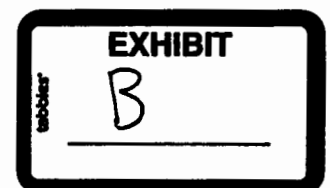
RE: Application Renew/Information Request
NPDES Permit Number SOP-08040
IRM Utility, Inc. – Genesis Village Estates (“Genesis”)
Crossville, Cumberland County, Tennessee
4955 Genesis Road

Dear Mr. Harris,

This letter is in response to your request of information dated January 13, 2014. Integrated Resource Management, Inc. d/b/a IRM Utility, Inc., (“IRM”) has always made the consideration that this and all systems IRM is involved with, operate in a manner that is protective of public health, and the surface/ground waters of the State of Tennessee. IRM offers descriptions of its responses to the supplemental information requested to process the application below:

IRM went to contract with Genesis in March of 2008; this contract was renewed and updated for the Tennessee Regulatory Authority (“TRA”) in September of 2012 which was endorsed by the Registered Agent, Mr. David Bryan. A confirmation was supplied by Genesis to the TRA in a Letter of Intent from Genesis to have IRM service the subdivision. Subsequently, IRM received an Order from the TRA in December 2012 to service Genesis. The reason for the delay from the onset of the initial contract of March 2008 until December 2012 was that Genesis had put the project on hold. Although Genesis had built part of the collection system and multiple buildings prior to IRM’s contract in 2008, Genesis had contracts to sell Townhomes that fell through due to the economy, and then Genesis stopped construction.

It was not until June of 2011 that IRM drove through Genesis and suspected there may be use of one of the buildings. IRM sent a Certified Letter to Genesis as a warning to not use the wastewater system until the wastewater system was completed, inspected, operable and approved by IRM. Please see attached letter. This letter got things moving for the CCN, but no construction convened.





IRM's typical method of operation prior to signing a subdivision plat is to have an Irrevocable Letter of Credit ("LOC") in the amount to service potential customers on the recorded plat signed by IRM. IRM has an LOC with IRM as the beneficiary on behalf of Genesis. Due to the fact that there is a contingency that the LOC can only be presented within the last 15 days prior to expiration, IRM was not able to have called the LOC earlier. The system would have been completed in the summer of 2013 to serve the recorded plat that is in existence. The system should have been completed by Genesis by now.

This leads to IRM's responses to the Compliance Schedule request to the bulleted items on Page 2 of your request. Since the items were not numbered the answers will be paraphrased with a short excerpt of the bulleted items for identification and are responded to below:

"A corrective action plan..."

IRM is now within the contingency window of calling the LOC. Genesis is in default and IRM is calling the LOC at the present time. Upon the Division approving the Application, IRM will have the funds to contract a cooperative Tennessee Licensed Pumper to check the lift station collection tank, keep records of pumping, haul to a POTW, and submit reports to the Cookeville Office as required. Construction materials will be ordered such as tanks, pumps, controllers and site preparation for tanks, temporary and permanent electrical service arrangements will begin immediately.

"Construction plans and specifications..."

The system will be constructed in accordance to the Permit Modification Application submitted February 19, 2009 by IRM. The collection system was completed, and the tank holes were dug within one year of approval. The Aqua-Pointe, Bioclere, filter was installed early in 2009 and the developer put a hold on construction, not IRM.

"A current schedule for completing construction..."

As indicated above, the ordering can begin immediately. Therefore, materials and tanks can be ready for delivery within 2 weeks of ordering, depending on back orders or delivery schedules of the vendors. Our construction group owns a vibratory plow and when soils conditions are dry and suited, the drip field can be plowed in within a week. Manifolds can be installed in another week. Simultaneously, crews can be setting grade and preparing final tank setting. Plumbing and electrical conduit can then be installed in a few days. Installation of pumps, controllers, and pulling wire will be organized for one week.

Summary; if the weather cooperates, it is practical to estimate that the system could be installed in six (6) to eight (8) weeks.

"The name and business address..."

Integrated Resource Management, Inc. d/b/a, IRM Utility, Inc., as permitted will operate the system.



"Clarification whether the entity will..."

The system will be purchased and placed on the property. The existing systems components will be Quit Claimed by Genesis to IRM. The property will be deemed as green space with a perpetual easement to IRM and recorded at the Cumberland County Courthouse as per existing contract.

"A revised SOP/UIC..."

The scope of work does not intend to be changed.

IRM Utility, Inc. has TRA's CCN Territory Order, is willing, is capable, and has contractual obligation to provide service to Genesis Estates Village Townhomes, L.L.C. for the recorded plat of record. IRM will be pleased, with the appropriate funding, to facilitate the completion of the project and bring the service to the project within compliance as soon as possible. Furthermore, IRM will continue protecting public health and the "Waters of the State of Tennessee".

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Jeffrey W. Cox, Sr.", written over a light blue horizontal line.

Jeffrey W. Cox, Sr.
President IRM Utility Inc.

Enclosure:

CC: Charles Welch, Farris, Mathews PLC



Integrated Resource Management, Inc.

A Privately Owned Public Utility

P.O. Box 642

3444 Saint Andrews Drive

White Pine, Tennessee 37890

Phone (Vol) 674-0828

Facsimile (Vol) 674-2352

Toll Free (877) 746-2910

June 20, 2011

Genesis Properties
PO Box 398
Morrison, Tennessee 37357

Certified Mail # 7007 0710 0002 5144 4099

RE: Genesis Village Subdivision
Re-start of Sewer Installation and Utility Set-up
Cumberland County, Tennessee

Dear Mr. Emery,

Integrated Resource Management, Inc. d/b/a IRM Utility, Inc. ("IRM") is of the understanding that the subdivision referenced above is proceeding with the wastewater system as previously contracted March 27, 2008. As you are aware, the Utility Services Agreement signed March 27, 2008 by Mr. Gary Emory on behalf of Genesis Properties Partners contained specific provisions. Section 2 requires proper security for the construction of the system, whether that is in the form of certified funds or a letter of credit. As you know, the plat may not be recorded until the requirements of the contract, notably Section 2, are satisfied. It was represented to me this security requirement would be effectuated on March 1, 2008, however this has not occurred. The plat is not to be considered valid until such time as these terms are complied with.

Further, it has come to my attention that a home located in the Genesis Village Estates may be occupied and hooked up to a partial collection system. As you are no doubt aware, we are contracted to operate and maintain this septic system but are required to obtain the proper certification from the Tennessee Regulatory Authority. While we have filed for this certificate it has not been finalized and granted. Additionally, there is more build out required to complete the system. If it is in fact the case that the partially completed collection system is being used, you and/or the homeowner are in violation of Tennessee wastewater regulations and I advise you to discontinue the same immediately. Once we have received the proper certification from the TRA and the build-out is complete, you will receive the appropriate notification to begin use of the system.

Please contact IRM at 865-674-0828 immediately to report a compliance schedule.
Thank you.

Sincerely,

Jeffrey W. Cox, Sr. President

IRM Utility, Inc.

Track & Confirm

Search Results

Label/Receipt Number: 7007 0710 0002 5144 4099

Expected Delivery Date: June 23, 2011

Class: First-Class Mail®

Service(s): Certified Mail™

Status: Delivered

Your item was delivered at 3:23 pm on June 23, 2011 in MORRISON, TN 37357.

Detailed Results:

- Delivered, June 23, 2011, 3:23 pm, MORRISON, TN 37357
- Notice Left, June 23, 2011, 7:57 am, MORRISON, TN 37357
- Arrival at Unit, June 23, 2011, 7:41 am, MORRISON, TN 37357
- Processed through Sort Facility, June 23, 2011, 12:01 am, CHATTANOOGA, TN 37421
- Acceptance, June 21, 2011, 4:05 pm, KNOXVILLE, TN 37914

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