



851 Aviation Parkway  
Smyrna, TN 37167

October 5, 2015

Mr. David Foster, Chief  
Utilities Division  
Tennessee Regulatory Authority  
502 Deaderick Street, 4<sup>th</sup> Floor  
Nashville, TN 37243

RE: Docket # 15-00025

Dear Mr. Foster,

Enclosed, please find an original and four (4) copies of the monthly report filed pursuant to the order in Docket 15-00025. Please let me know if you have any questions.

Kind regards,



Jeff Ridsen  
General Counsel

Tennessee Wastewater Systems, Inc.  
Docket 15-00025  
October Report Overview

Systems subject to Notice of Violations and other Corrective Orders\*:

Tall Oaks (NOV) – repairs made (see included letter), awaiting inspection by TDEC

Starr Crest I (NOV) – repairs made (see included letter), awaiting inspection by TDEC – cost for repairs to this location were filed in last month's Docket 14-00006 report

Starr Crest II (NOV) – repairs made (see included letter), awaiting inspection by TDEC – additional capacity issues are being addressed with HOA to determine the amount of additional capacity at the development and plans are being drafted accordingly.

Smoky Village (NOV) – repairs made (see included letter), awaiting inspection by TDEC – also part of Docket 14-00136 and awaiting TDEC's reconsideration of the validity of TWSI's plans to move forward with hearing on docket petition.

Townsend Square (NOV) – repairs made (see included letter), awaiting inspection by TDEC

Swan Harbor (NOV) – repairs made (see included letter), awaiting inspection by TDEC

Summit View – part of the 14-00136 Docket – currently drafting plans to submit to TDEC for approval

Cedar Hill – part of the 14-00136 Docket – construction plans are nearing approval and modified SOP will be put up for public comment soon

Maple Green – part of the 14-00136 Docket - construction plans are nearing approval and modified SOP will be put up for public comment soon

\*NOTE – These NOV's are based on site inspections conducted in July 2015. TWSI sent TDEC a letter in August 2015 (included in this report and filed in docket 14-00006) outlining the corrective action taken and repairs made. The NOV's were sent to TWSI on September 18, 2015 prior to any follow up inspection of the affected sites by TDEC prior to issuing these NOV's.

\*\* Repair costs to these locations fell under normal O&M costs due to minor nature of the repairs

## Jeff Riden

**From:** HAWKMS Agent [agent@hawkms.com]  
**Sent:** Thursday, October 1, 2015 11:36 AM  
**To:** Charles.Hyatt@adenus.com; Brian.Carter@adenus.com; Roy.Denney@adenus.com; John.Czahoroski@adenus.com  
**Cc:** jeff.riden@adenus.com; bob.pickney@adenus.com; matt.pickney@adenus.com  
**Subject:** TRA KPI Compliance Report for 10/1/2015 11:35:11 AM

## TRA Flow KPI Report for 9/30/2015

Tracy Nichols	Permitted	Expected	Actual	% of Expected	AvgFlow	% of
Cedar Hill DCP	75000	18036	11356	0.63	523.45	
Maple Green DCP	74000	38873	40960	1.05	45382.67	

Tony Smith	Permitted	Expected	Actual	% of Expected	AvgFlow	% of
Tall Oaks RSF	45000	11550	13400	1.16	10216.67	

Jeramy Stewart	Permitted	Expected	Actual	% of Expected	AvgFlow	% of
Starr Crest I RSF	8000	2275	2224	0.98	388.40	
Starr Crest II BC	28000	23450	14620	0.62	14343.53	
Summit View RSF	8000	5775	7980	1.38	4332.67	

Stone Hanson	Permitted	Expected	Actual	% of Expected	AvgFlow	% of
Townsend Town Square RSF	3640	3640	1350	0.37	1741.40	

## Jeff Ridsen

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**From:** Charles Hyatt [charles.hyatt@adenus.com]  
**Sent:** Monday, September 28, 2015 10:34 AM  
**To:** 'Jeff Ridsen'  
**Subject:** FW: Alan Rather's Site Inspections  
**Attachments:** Response to TDEC East TN Inspections 2015-07-20.pdf

This was the only communication I had.

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**From:** Charles Hyatt [mailto:charles.hyatt@adenus.com]  
**Sent:** Friday, August 21, 2015 12:59 PM  
**To:** 'Allen Rather' <Allen.Rather@tn.gov>  
**Cc:** 'John Czahoroski' <john.czahoroski@adenus.com>  
**Subject:** FW: Alan Rather's Site Inspections

Allen,

Please find John's response to the recent inspections.

Thanks  
Charles

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**From:** John Czahoroski [mailto:John.Czahoroski@adenus.com]  
**Sent:** Wednesday, August 19, 2015 5:52 PM  
**To:** 'Charles Hyatt' <charles.hyatt@adenus.com>  
**Cc:** john.czahoroski@adenus.com  
**Subject:** RE: Alan Rather's Site Inspections

Charles, please see attached.



### John Czahoroski

Operations & Maintenance Manager

Tennessee Wastewater Systems, Inc. | 851 Aviation Pkwy, Smyrna, TN 37167  
Mobile: 865.809.8286 | Fax: 615.220.7207

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**From:** Charles Hyatt [mailto:charles.hyatt@adenus.com]  
**Sent:** Wednesday, August 19, 2015 8:57 AM  
**To:** 'John Czahoroski'  
**Subject:** Sites

John,

I need to respond to Alan's July 20<sup>th</sup> inspections today. Update the letter for I can send it on.

Thanks  
Charles



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.*

We are not 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. ". Ponding was previously observed on the February 28, 2014 inspection conducted by KEFO 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

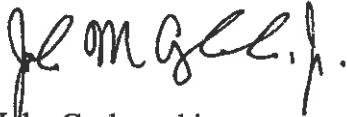
downspouts of the adjacent commercial building has now been diverted from entering the drip field and instead directed toward that property's stormwater retention pond. Although we do not believe any observed ponding was due to leaks in the drip tubes, we will promptly investigate any ponding at this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

A handwritten signature in black ink, appearing to read "John Czahoroski". The signature is fluid and cursive, with a large initial "J" and "C".

John Czahoroski  
Operations & Maintenance Manager





Photo #1



Photo #2



Photo #3



Photo #4



Photo #5



Photo #6



Photo #7



Photo #8



851 Aviation Parkway  
Smyrna, TN 37167

September 2, 2015

Joseph Sanders  
General Counsel  
Tennessee Department of Environment and Conservation,  
Office of General Counsel  
William R. Snodgrass Tower, 2<sup>nd</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

VIA EMAIL & U.S. MAIL

RE: Tennessee Wastewater Plans Extension for Smoky Village WPC 13-0355

Dear Mr. Sanders:

The Tennessee Regulatory Authority ("TRA"), acting through Hearing Officer Kelly Cashman-Grams, has directed Tennessee Wastewater Systems, Inc. ("TWSI") to seek confirmation from the Tennessee Department of Environment and Conservation ("TDEC") as to the status of the construction plans for Smokey Village WPC 13-0355.

As you know, TWSI has been directed by TDEC to correct drainage problems at Smokey Village and that TWSI's construction plans to address those issues were approved by TDEC in December 2013. The total estimated cost of the repairs is \$159,294.60. Preliminary construction at a cost of approximately \$1,800 began in January 2014 but the remaining work cannot be done until the TRA approves financing for the project. Late last year, when TWSI requested from TDEC an extension on the time limit applicable to those plans, TWSI was told, both orally and in a confirming email, that since construction work on the site had begun, no extension was necessary. A copy of that email exchange is attached.

Today, during a pre-hearing conference at the TRA, a question was raised as to whether, despite the email exchange, the plans for Smoky Village may have expired. The Hearing Officer therefore asked TWSI to obtain clarification, in writing, from TDEC as to whether the plans have expired or are still in effect. The Hearing Officer asked that TDEC's response be filed with the TRA by the close of business on Thursday, September 3.


Hearing Officer Grams said that the TRA is considering convening a hearing on TWSI's request for financing on September 15, 2015 but that the TRA will not go forward with the hearing on that date unless the TRA receives written confirmation from TDEC that TDEC's previous approval of the construction plans for Smoky Village is still in effect. Therefore, please provide as soon as possible clarification as to the status of the construction plans for Smoky Village.



851 Aviation Parkway  
Smyrna, TN 37167

Thank you for your consideration of this request. A copy of this request will be filed with the TRA in Docket 14-00136.

Kind regards,

  
Jeff Ridsen  
General Counsel

Cc: Henry Walker  
Rachel Newton  
Chuck Welch  
Kelly Cashman-Grams  
George Bell  
Patrick Parker

**Jeff Riden**

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**From:** Roy Denney [roy.denney@adenus.com]  
**Sent:** Monday, August 31, 2015 4:00 PM  
**To:** Jeff Riden  
**Subject:** FW: Smoky Village  
**Attachments:** smoky village letter.pdf

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**From:** Roy Denney [mailto:roy.denney@adenus.com]  
**Sent:** Thursday, November 20, 2014 5:11 PM  
**To:** brad.harris@tn.gov  
**Subject:** Smoky Village

Brad,

We need to extend the construction permit for Smoky Village. It's under construction but some is still awaiting TRA funding approval.

Thanks,

Roy



849 Aviation Parkway  
Smyrna, TN 37187

Mr. Brad Harris, PE  
Manager Land Based Systems  
Tennessee Department of Environment and Conservation  
Division of Water Resources  
Tennessee Tower  
312 Rosa Parks Ave. 11<sup>th</sup> Floor  
Nashville, TN 37243-1102

November 20, 2014

Subject: Smoky Village  
WPC 13-0355

Brad Harris, PE:

We wish to extend the permit for construction at Smoky Village WPC 13-0355. Construction has commenced however portions of the project are still awaiting TRA approval for funding.

Kind Regards,

A handwritten signature in cursive script that reads "Roy Denney".

Roy Denney, PE



**Jeff Risdén**

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**From:** Roy Denney [roy.denney@adenus.com]  
**Sent:** Monday, August 31, 2015 4:12 PM  
**To:** charles.hyatt@adenus.com; Jeff Risdén  
**Subject:** FW: Smoky Village

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**From:** Brad Harris [mailto:Brad.Harris@tn.gov]  
**Sent:** Tuesday, December 2, 2014 10:43 AM  
**To:** Roy Denney  
**Subject:** RE: Smoky Village

Roy,

I forwarded your request to Bob last week to look at since he approved the original plans. He is out this week, but will be back on the 8<sup>th</sup>.

Brad

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**From:** Roy Denney [mailto:roy.denney@adenus.com]  
**Sent:** Thursday, November 20, 2014 5:11 PM  
**To:** Brad Harris  
**Subject:** Smoky Village

\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - OIR-Security. \*\*\*

Brad,

We need to extend the construction permit for Smoky Village. It's under construction but some is still awaiting TRA funding approval.

Thanks,

Roy

**Jeff Ridsen**

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**From:** Roy Denney [roy.denney@adenus.com]  
**Sent:** Thursday, August 27, 2015 11:34 AM  
**To:** Jeff Ridsen  
**Subject:** FW: Smokey Village WPC 13-0355

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**From:** Robert Odette [mailto:Robert.Odette@tn.gov]  
**Sent:** Monday, December 15, 2014 8:20 AM  
**To:** roy.denney@adenus.com  
**Subject:** Smokey Village WPC 13-0355

Good Morning Roy:

This is to confirm what we spoke about via telephone this morning relative to the Smokey Village construction permit WPC 13-0355.

You has requested an extension of the permit for construction; however, since construction has commenced on portions of this project no time extension is necessary. The only time deadline is to start construction within one year of construction approval.

Hope this helps—if you need an official letter to this effect please advise.

*Bob O'*

**Robert G. O'Dette, M.S., P.E.**

Division of Water Resources

Tennessee Department of Environment and Conservation

William R. Snodgrass Tennessee Tower, 11<sup>th</sup> Floor

312 Rosa L. Parks Avenue

Nashville, TN 37243-1102

Office: (615) 532-0625

Direct: (615) 253-5319

Fax: (615) 532-0686





STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243-0435

ROBERT J. MARTINEAU, JR.  
COMMISSIONER

BILL HASLAM  
GOVERNOR

September 11, 2015

SENT VIA US MAIL & EMAIL

Jeff Ridsen, Esq.  
General Counsel  
Tennessee Wastewater Systems, Inc.  
851 Aviation Parkway  
Smyrna, TN 37167

Mr. Ridsen:

I am writing in response to your letter dated September 2, 2015, requesting information regarding the status of construction plans for "Smoky Village."

Your letter had enclosed e-mail and other correspondence between Department staff and Mr. Roy Denney, an engineer acting on behalf of Tennessee Wastewater Systems, Inc. ("TWSI"). In the enclosed letter dated November 20, 2014 letter and in an e-mail of the same date, Mr. Roy Denny represented to Department staff that "construction" had commenced at the proposed Smoky Village site. Mr. Denny made a similar representation to Mr. Robert O'Dette in a telephone conversation that took place on December 15, 2014. These representations are particularly germane because Tenn. Comp. R. & Regs. 0400-40-02-.05(1) provides, in part, that:

If construction has not commenced *in accordance with approved plans and specifications* within one year from the date of approval of said plans and specifications, the approval shall be subject to re-evaluation and may be declared null and void. (emphasis added)

Based upon the referenced representations Mr. O'Dette responded by indicating that no extension of the permit was necessary *because construction had commenced*. However, department staff that has visited the proposed Smoky Village site on multiple occasions in 2015 and report seeing no evidence of the commencement of construction activities in furtherance of completion of the approved plans and specifications. Therefore, in accordance with Tenn. Comp. R. & Regs. 0400-40-02-.05(1), it appears that the Smoky Village construction plans are now subject to review and re-evaluation by the Department and may be declared null and void.

Your letter does correctly note that drainage problems have persisted within the Smoky Village subdivision for some time and have been the subject of enforcement action by the Department, including a 2009 Director's Order. The drainage problems were supposedly resolved in November 2010. However, drainage problems have since been the subject of complaints, additional contemplated enforcement action, and ongoing negotiations between TWSI and this Office to address prevailing conditions of pollution.

Letter to Jeff Riden  
September 14, 2015  
Page 2 of 2

TWSI is urged to promptly re-submit construction plans to the division in accordance with applicable rules and current guidance. If you have any questions or concerns regarding the foregoing, please don't hesitate to contact me or Patrick Parker.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Joseph Sanders". The signature is fluid and cursive, with a long horizontal stroke at the end.

E. Joseph Sanders  
General Counsel

Cc: George Garden  
Brad Harris  
Robert O'Dette  
Patrick Parker  
George S. Bell, III

September 16, 2015

Joseph Sanders , Esq.  
General Counsel  
Tennessee Department of Environment and Conservation,  
Office of General Counsel  
William R. Snodgrass Tower, 2<sup>nd</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

VIA EMAIL & U.S. MAIL

RE: Tennessee Wastewater Plans Extension for Smoky Village WPC 13-0355

Mr. Sanders:

I am writing in response to your letter dated September 11, 2015 denying the validity of Tennessee Wastewater's ("TWSI") construction plans for Smoky Village.

In your response you state, "Department staff visited the Smoky Village site multiple times in 2015 and report seeing no evidence of the commencement of construction activities in furtherance of completion of the approved plans and specifications". Tenn. Comp. R. & Regs. 0400-40-05-.02(19) defines "commencement of construction" as "the initial disturbance of soils associated with *clearing*, grading, or excavating activities or *other construction activities*." (emphasis added) The term "construction" is defined in Tenn. Comp. R. & Regs. 0400-40-05-.02(23) as "the placement, assembly, or *installation of facilities or equipment, including contractual obligations to purchase* such facilities or equipment, at the premises where such equipment will be used, *including preparation work at such premises*". (emphasis added) The following is a list of the construction activities commenced in accordance with the approved plans and specifications at the Smoky Village site:

- Control panel upgraded to add monitoring and control of the drip zones per the approved plans
- Clearing of the site with mini-excavator for layout of the new drip field
- Drip emitter pipe, forcemain, and PVC fittings material for the system were ordered

Each of these actions, whether taken separately or collectively, clearly meets the definitions stated in the Board's rules for the terms "commencement of construction" and "construction".

In light of the foregoing, I respectfully ask TDEC to reconsider's its position on the validity of the construction plans for Smoky Village. Should TDEC determine the plans still void, I ask that all documentation, including but not limited to, inspection reports, photographs, and



851 Aviation Parkway  
Smyrna, TN 37167

field notes regarding all Smoky Village site visits by department staff be provided to me for further consideration and evaluation.

Kind regards,

  
Jeff Riscden  
General Counsel

Cc: Charles Hyatt  
Bob Pickney  
Roy Denney  
Henry Walker, Esq.  
Patrick Parker, Esq.



**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
OFFICE OF GENERAL COUNSEL  
312 Rosa L. Parks Avenue  
William R. Snodgrass Tennessee Tower, 2<sup>nd</sup> Floor  
Nashville, Tennessee 37243-1548  
Telephone: (615) 532-0131**

September 22, 2015

**SENT VIA US MAIL & EMAIL**

Jeff Ridsen, Esq.  
General Counsel  
Tennessee Wastewater Systems, Inc.  
851 Aviation Parkway  
Smyrna, TN 37167

Mr. Ridsen:

I am writing in response to your letter dated September 16, 2015, requesting that the Department reconsider its position stated in my letter dated September 14, 2015 regarding construction plans for Smoky Village. I am mindful of the law you cited in your most recent letter and your client's position that certain construction activities commenced at said site. To assist with our evaluation, additional information and documentation will be helpful. Therefore, please provide the following:

1. Any time sheets, travel logs, travel claims, contracts or other document identifying person(s) actually traveling and/or performing any service referenced in the attached compilation of expenditures submitted on behalf of your client in the Tennessee Regulatory Authority Docket No. 1400136 (hereinafter "attached compilation of expenditures") on or about August 28, 2015;
2. Copies of any invoices or other documents describing, quantifying or providing any other information regarding any expenditure noted in the attached compilation of expenditures;
3. Copies of any check or instrument that embodies payment for any service or expenditure referenced in the attached compilation of expenditures;
4. Any schedule, cost sheet or other documentation that would show how any cost (e.g. hourly rate for electric work; mileage; travel; etc.) was allocated in the attached compilation of expenditures;
5. Any email, photograph, field notes or other documentation evidencing any activity referenced in your letter or the attached compilation of expenditures;
6. Any purchase order, lease agreement, contract, confirmation, or other document identifying any track hoe, mini-excavator, electrical control, electrical component, pipe, fitting, flag, stake, tool, equipment, or the source of same if said tool or equipment was utilized, or was planned to be

utilized at the aforementioned site or in furtherance of activities contemplated by the referenced Smoky Village plans.

If you have any questions or concerns regarding the foregoing, please don't hesitate to contact me or Patrick Parker.

Sincerely,

A handwritten signature in cursive script, appearing to read "E. Joseph Sanders".

E. Joseph Sanders  
General Counsel

Cc: George Garden  
Brad Harris  
Robert O'Dette  
Patrick Parker  
George S. Bell, III



**Previously Completed Construction**

Up-Grade Controls -Electrical Work	4	hr	42.86	\$171.44
Electrical Components		ls		\$186.00
Equipment/Operator - Trackhoe (Clearing/access)	8	hr	45.00	360.00
Travel	800	mi	0.57	456.00
Preliminary Layout of Drip Components	6	hr	34.00	204.00
Misc. - Flags, Stakes Etc.		ls		45.00
Milage	764	mi	0.57	446.88

**Total Previous Construction****\$1,869.32**

September 24, 2015

Joseph Sanders , Esq.  
General Counsel  
Tennessee Department of Environment and Conservation,  
Office of General Counsel  
William R. Snodgrass Tower, 2<sup>nd</sup> Floor  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

VIA EMAIL & U.S. MAIL

RE: Tennessee Wastewater Plans Extension for Smoky Village WPC 13-0355

Mr. Sanders:

Enclosed, please find the requested documentation from your letter dated September 22, 2015 for the construction activities at Smoky Village. They include:

- Invoice from Adenus Technologies, LLC for the electrical components installed at the site.
- Time sheets for Bob Pickney and Charles Myres who performed the work at the site.
- Bob Pickney's January 2014 credit card statement establishing his presence in East TN on the dates reflected on the timesheets.

I trust this will be considered sufficient evidence to establish that construction had commenced at the site within the one year period as specified on the plans and TDEC will deem the plans valid.

Please let me know if you have any further questions.

Kind regards,



Jeff Riden  
General Counsel

Cc: Charles Hyatt  
Bob Pickney  
Roy Denney  
Henry Walker, Esq.  
Patrick Parker, Esq.

Adenus Technologies, LLC

849 Aviation Parkway  
Smyrna, TN 37167

DATE
12/4/2013

NAME / ADDRESS
Smoky Village C/O Bob Pickney

TERMS	Valid Through	PROJECT
COD	12/4/2013	

ITEM	DESCRIPTION	QTY	COST	TOTAL
	East TN additional zones for control			
EP-TB-Relay_Bas...	PLC relay, Base terminal block with screw connection, 24v, HOA switch relay. Phoenix # 2982236	3	30.83	92.49T
EP-Wire 16 MTW...	WIRE, 16GA. MTW, BLU, 2500FT SPOOL STRANDED, REF # 187100604465	25	0.14	3.50T
EP-TB-Single UT...	Terminal Block Single-Feed Through UT6. Box of 50, Phoenix # 3044131.	3	1.33667	4.01T
EP-TB-Single end...	Terminal Block Single-Feed Through end cover DN-EC1210 box of 100	2	0.39	0.78T
EP-TB-END	End Bracket Phoenix	2	1.32	2.64T
EP-TB Label ZB6...	Custom Zack Strip for PLC Relay, CMSZB6. Vertical Print Y31-Y40	1	1.47	1.47T
EP-TB-Triple DN...	Terminal block Triple level feed through 25 per box price each	2	2.46	4.92T
EP-TB Triple leve...	Three level terminal block jumpers 3per pk	1	9.54	9.54T
EP-TB-Triple DN...	End cover for Terminal block Triple level feed through 25 per box price each	2	0.60	1.20T
Shop supplies for ...	din rail, panduit, screws hardware	34.25	1.42861	48.93T
			(9.75%)	\$16.52
			<b>TOTAL</b>	<b>\$186.00</b>

SIGNATURE \_\_\_\_\_

## Biweekly Time Sheet

12/14/2013

Day	Hadden Spr	Sloan Cr 2	Tail Ores	Misc.	Hr	A/Mac	Hr	Misc. Other Hours	Total
Sunday	12/8/2013			Swan Harb.	3			2.00	5.00
Monday	12/9/2013	8							8.00
Tuesday	12/10/2013	5		Smoky Village Black Bear	4				9.00
Wednesday	12/11/2013		3		5				8.00
Thursday	12/12/2013	5		Black /Bear	3			1.00	9.00
Friday	12/13/2013			Jackson Bend	4		Griffins Mill	1.00	9.00
Saturday	12/14/2013								
<b>Total hours</b>									<b>48.00</b>

## Biweekly Time Sheet

12/21/2013

[illegible]

Charles Myres

## Biweekly Time Sheet

Week ending: 12/21/2013

Day		Starr Crest	Tall Oaks	Hidden Spr	Misc.	Hours	Misc.	Hours	Total
Sunday	12/15/2013								
Monday	12/16/2013	8							8.00
Tuesday	12/17/2013	8							8.00
Wednesday	12/18/2013	8							8.00
Thursday	12/19/2013				Smoky Village	8			8.00
Friday	12/20/2013	8							8.00
Saturday	12/21/2013								
		Total hours							40.00



BOB PICKNEY

Account Number: XXXX XXXX XXXX 0195

## TRANSACTIONS

An amount followed by a minus sign (-) is a credit, unless otherwise indicated.

Tran Date	Post Date	Reference Number	Transaction Description	Amount
12/18	12/16	7469216AZ00FWGN1A	SUNOCO 0146962600 ROCKWOOD TN CREDIT	\$11.56-
01/03	01/03	F361900CK00CHGDDA	AUTOMATIC PAYMENT - THANK YOU	\$4,123.81-
12/09	12/11	2407105AR7BL5903T	A&W RESTAURANT SEVIERVILLE TN	
12/10	12/11	2407105AR4KABJWJL	BELLACINO'S PIZZA AND SEVIERVILLE TN	
12/10	12/11	2432688ATKQ8BFM8G	ADVANCE AUTO PARTS #5661 PIGEON FORGE TN	
12/10	12/11	2442733ARLYHXQ05W	DENNY'S #8548 PIGEON FORGE TN	
12/10	12/11	2444500AR8PGX6Z56	RYANS #2450 Q82 SEVIERVILLE TN	
12/10	12/11	2475542AR51H5WLF8	MELS DINER 5 PIGEON FORGE TN	
12/11	12/11	2433691AS04KQW8EW	MCCARTER LUMBER CO # PIGEON FORGE TN	
12/11	12/11	2442733ASLM7NHTJT	FASTOP MARKET #226 PIGEON FORGE TN	
12/11	12/11	2443108AS803VM8NE	LJS #31093 PIGEON FORGE TN	
12/11	12/11	2475542AS3WBJ3MLK	THREE JIMMYS GATLINBURG TN	
12/11	12/11	2475542AT7MBE46GY	MELS DINER 5 PIGEON FORGE TN	
12/12	12/12	2416407AV7DLXR07D	SUBWAY 00139198 PIGEON FORGE TN	
12/12	12/12	2442733AVLM8DQE28	FOOD CITY #867 SEVIERVILLE TN	
12/12	12/12	2475542AVJP8WZXP8	THE OLD MILL RESTAURANT PIGEON FORGE TN	
12/13	12/13	2442733AWLM8HFMG2	FOOD CITY #867 SEVIERVILLE TN	
12/13	12/13	2482801AV008DE1P8	PILOT Crossville TN	\$67.95
12/16	12/16	2416407AZE98Y3HYF	APPLEBEES 757360502218 SEVIERVILLE TN	
12/16	12/16	2416407B11NJ8HHNW	KFC J718315 48800944 SEVIERVILLE TN	
12/16	12/16	2427538AZB1B0448V	JOHNSTONE SUPPLY PIGEON F PIGEON FORGE TN	
12/16	12/16	2427538AZB1B0448B	JOHNSTONE SUPPLY PIGEON F PIGEON FORGE TN	
12/16	12/16	2469216AZ00FWGN0N	SUNOCO 0146962600 ROCKWOOD TN	\$49.70
12/16	12/16	2469216AZ00FWGN0X	SUNOCO 0146962600 ROCKWOOD TN	\$70.00
12/17	12/17	2401339AZ00ZLESDP	NO 1 CHINESE BUFFET SEVIERVILLE TN	
12/17	12/17	2442733B0LM8Q82D4	FOOD CITY #867 SEVIERVILLE TN	
12/18	12/18	2444500B08PHDL2B7	SHONEY'S #14 PIGEON FORGE TN	
12/19	12/19	2469216B1008XGMHN	JOESCRBSHK-SEVIERVILLE SEVIERVILLE TN	
12/19	12/19	2475542B23WQ0WRZ7	DUNNS MARKET SEVIERVILLE TN	
12/20	12/20	2407105B24K8Q7ATB	CHEDDARS CASUAL CAFE - PIGEON FORGE TN	
12/20	12/20	2442733B2LYHZ8KSQ	DENNY'S #8548 PIGEON FORGE TN	
12/20	12/20	2443105B261KJ3MPZ	HARDEE'S 1501793 SEVIERVILLE TN	
12/20	12/20	2475542B33WQQHFHS	DUNNS MARKET SEVIERVILLE TN	
12/20	12/20	2475542B33WQQHF5P	DUNNS MARKET SEVIERVILLE TN	
12/21	12/21	2412254B3MHG9VLDM	68 MARKET CENTER SEVIERVILLE TN	\$52.89
12/21	12/21	2416407B47DLR3GB0	SUBWAY 00139198 PIGEON FORGE TN	
12/27	12/27	2444500BA5SA44TQM	MAPCO-EXPRESS #3320 MT JULIET TN	\$60.21
01/02	01/02	2401517QJ002JB9Y03	D AND K PETROMART HERMITAGE TN	\$67.08
01/05	01/05	2444500QN5S9HB3NX	THORNTONS #0600 Q35 SMYRNA TN	
01/06	01/06	2422443QP22XYGJ0G	EL RODEO RESTAURAN LAVERGNE TN	
01/06	01/06	2429910QP00AF5M5P	040063 VALVOLINE INSTANT LA VERGNE TN	

\$1,838.21 WILL BE DEDUCTED FROM YOUR ACCOUNT AND CREDITED  
AS YOUR AUTOMATIC PAYMENT ON 02/04/14.

VISIT [WWW.DREAMPOINTS.COM](http://WWW.DREAMPOINTS.COM) OR CALL (888) 616-8404 FOR  
REDEMPTIONS OR QUESTIONS ABOUT YOUR DREAMPOINTS POINT  
TOTALS.

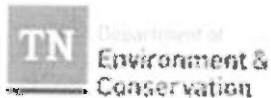
\*\*IF THIS IS A CONSOLIDATED PAY ACCOUNT, ALL POINTS ARE  
EARNED ON THE BILLING ACCOUNT.\*\*

NOTICE: See reverse side of page 1 for Important information.

Food 808.33  
Fuel 367.63  
Supplies 354.42  
Maintenance 117.39

**Subject:** RE: Summit View - Water Line Violation - TNWastewater  
**From:** George Garden <George.Garden@tn.gov>  
**Date:** 9/3/2015 9:21 AM  
**To:** Terracom <terracom@ymail.com>  
**CC:** "Roy.denney@adenus.com" <Roy.denney@adenus.com>, Michael Caudill <Michael.Caudill@tn.gov>, "copperridge303@bellsouth.net" <copperridge303@bellsouth.net>

Thank you, Rick. Yes. Lord willing and the Sevier County traffic willing, I should be there on time.



**George C Garden, P.E. BCEE** | Chief Engineer  
Division of Water Resources  
Wm R Snodgrass Tennessee Tower, Floor 11  
312 Rosa L. Parks Ave.  
Nashville, TN 37243  
p. 615-253-9934 c. 615-416-0164  
[george.garden@tn.gov](mailto:george.garden@tn.gov)  
[tn.gov/environment](http://tn.gov/environment)

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**From:** Terracom [mailto:terracom@ymail.com]  
**Sent:** Thursday, September 03, 2015 8:15 AM  
**To:** George Garden  
**Cc:** Roy.denney@adenus.com; Michael Caudill; copperridge303@bellsouth.net  
**Subject:** Re: Summit View - Water Line Violation - TNWastewater

Hi George,

I wanted to confirm for our wastewater engineering consultant David Beverly that the 11:00am Friday meeting time at Summit View wastewater plant is local Sevierville Tn 11:00am eastern time not central.

Very respectfully,  
Rick

Sent from my iPad

On Sep 2, 2015, at 5:03 PM, George Garden <[George.Garden@tn.gov](mailto:George.Garden@tn.gov)> wrote:

I cannot leave on Thursday evening as I had planned so it will be approximately 11 am Friday morning before I can get to Summit View. I will want to understand the water tap reported in the email below. I'd like to stop by Smoky Village on the way out on Friday.

<image001.png>

**George C Garden, P.E. BCEE** | Chief Engineer



Division of Water Resources  
Wm R Snodgrass Tennessee Tower, Floor 11  
312 Rosa L. Parks Ave.  
Nashville, TN 37243  
p. 615-253-9934 c. 615-416-0164  
[george.garden@tn.gov](mailto:george.garden@tn.gov)  
[tn.gov/environment](http://tn.gov/environment)

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**From:** Terracom [<mailto:terracom@ymail.com>]  
**Sent:** Wednesday, September 02, 2015 7:59 AM  
**To:** Chuck Welch; Me; EDWARD THOMSPSON; Brandy L. Vaughn; Woodlands; Jamie Roth;  
[copperidge303@bellsouth.net](mailto:copperidge303@bellsouth.net)  
**Cc:** George Garden  
**Subject:** Summit View - Water Line Violation - TNWastewater

\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - OIR-Security. \*\*\*

All,

Attached are the photos supplied by Bill Waldrop, Ed Thompson and Steve Mackenzie where it appears TNWastewater/Adenus is tying a 1-1/2" water supply line from between cabin #10-11 at Summit View directly into a TNWastewater sewage holding tank on site at Summit View without notification or approval of the Summit View Property Management Company the Woodlands or HOA Board.

Ed Thompson questioned the TNWastewater/Adenus workers doing the work why this tying of a water line from our water system directly into a wastewater holding tank on site to no avail.

The 1-1/2" water line appears to utilize the HOA water source and add additional water flow directly into our wastewater system. During the unauthorized or approved work all 5 cabins tied to this well lost the use of water to the cabin owners and occupants at the time. The Woodlands had to make service calls to investigate the unauthorized work.

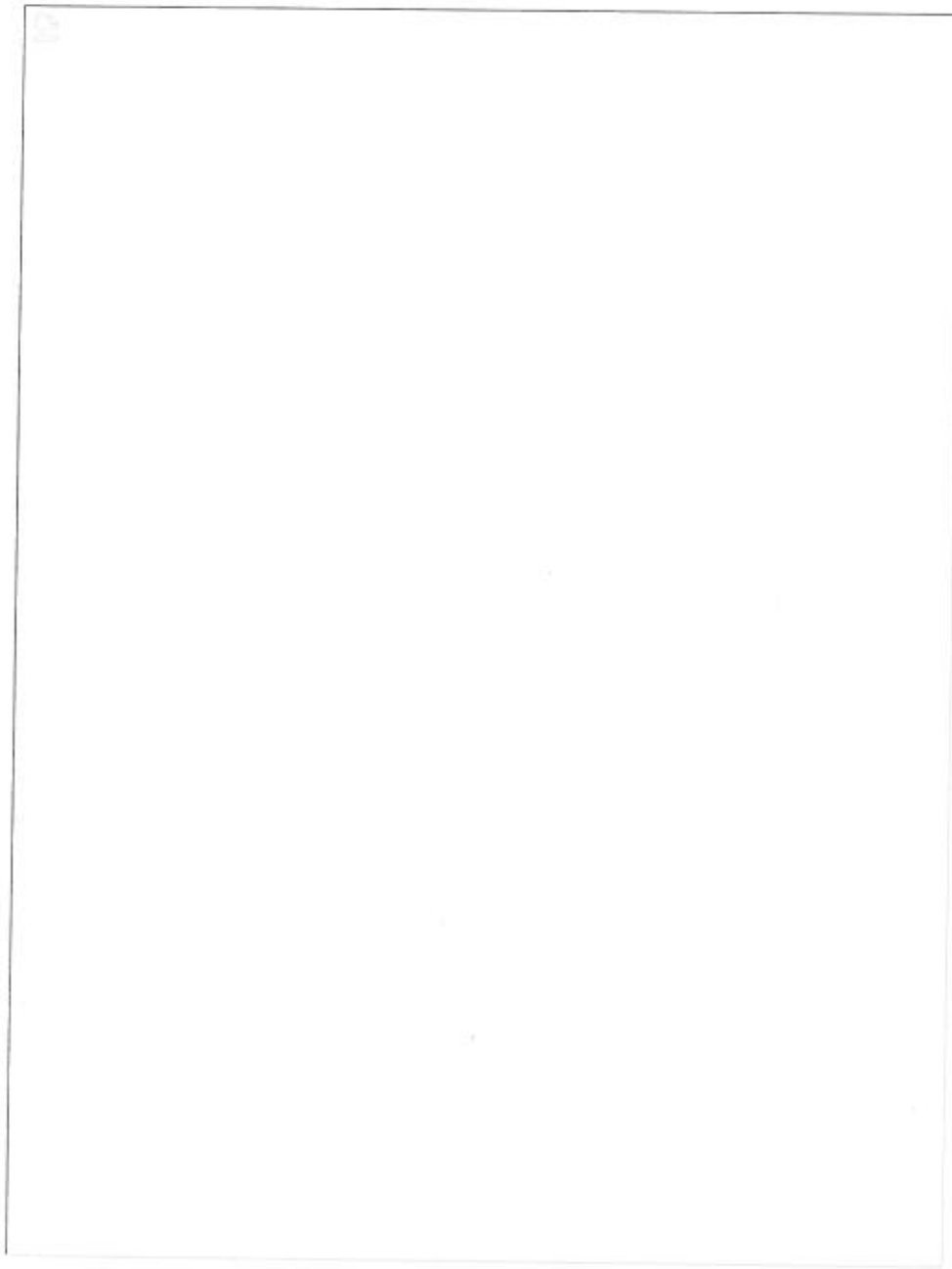
Why is this 1-1/2" water line being added directly into our was wastewater system which will add additional wastewater flow?

If you have any questions, please do not hesitate me.

Very respectfully,  
Rick Tucker

Summit View Board - President





Sent from my iPad

**Subject:** 150903\_Prelim P&S Approval Cedar Hill Wetland  
**From:** George Garden <George.Garden@tn.gov>  
**Date:** 9/3/2015 3:19 PM  
**To:** "Roy.denney@adenus.com" <Roy.denney@adenus.com>



**George C Garden, P.E. BCEE** | Chief Engineer  
Division of Water Resources  
Wm R Snodgrass Tennessee Tower, Floor 11  
312 Rosa L. Parks Ave.  
Nashville, TN 37243  
p. 615-253-9934 c. 615-416-0164  
[george.garden@tn.gov](mailto:george.garden@tn.gov)  
[tn.gov/environment](http://tn.gov/environment)

Attachments:

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150903\_Preliminary P&S Approval ltr excerpt.docx

15.9 KB

The Division received plans and engineering report/specifications for the proposed Free Surface Wetland as a remediation solution for the Cedar Hill Sewage Treatment Plant discharging to an existing adjacent land application site on August 27, 2015. The latest plans proposed building initially only the first 30,000 gallons per day wetland incorporating a second parallel wetland of the same size. This solution is authorized based on an average flow of approximately 13,000 gpd currently.

Tentative approval of the design as depicted in the plans and engineering report is granted pending receipt of the following:

1. Receipt of a revised cover sheet containing the authorized signature of the person representing the utility holding the permit and attesting approval of the plans;
2. Receipt and approval of a cross-section of the liner including the bottom horizontal and the sides of the wetland;
3. Process flow diagram of the new system showing its integration with the existing systems schematically showing:
  - a. Process piping (size and type) with flow direction including flushing lines, valves, instruments, pumps, wetwells, control panel (with input, output, and transmitted signals), control elements.
  - b. Basins/tankage (volume, surface area, design elevation), dosing zones (acreage)
  - c. Specifics of equipment, material
4. Calculation of velocity and required slope within the wetland basin.

In addition the following is assumed to be included in the construction plans:

1. UV stabilized piping exposed to sunlight;
2. Production of record drawings correcting deficiencies in the existing plans and indicating location of all fittings and piping relative to permanent features or sub-meter accuracy GPS;
3. Completion of an operations manual within 3 months of operation.
4. Notifying the Division 3 days prior to the following:
  - a. Completion of excavation and surveying;
  - b. Installation of the liner;
  - c. Planting; and
  - d. First discharge from the wetland

It is assumed that an SOP modification request for a two phased project will be submitted and approved within the next two weeks for 30,000 gpd for the first wetland and pending the conditions following for the installation of the second wetland prior to reaching an average flow of 24,000 gpd. The operator should expect monthly sampling and analysis of effluent CBOD5, Total Nitrogen, E. Coli, TSS for the first three years of operation or until vegetation is well establish within the wetland; monthly reporting of water flows to the school; and weekly report of wetland elevation relative to the design level.

TDEC-Division of Water Resources concurs in the use of *WEF FD- Natural Systems for Wastewater Treatment* by Crites, et.alia, however, the owner/operator is advised as the text indicates that wetlands, although requiring less maintenance than many other conventional mechanical plants, are not "no maintenance" facilities and that relative to the many concurrent and sequential biological, chemical and

physical processes going on the wetland's microsite levels, "sufficient data are not yet available to precisely define these mechanisms and their relationships. Thus, the present generation of design models approximates system performance based on system input-output data." In other words, while there are significant savings to be potentially realized by such a natural system, there are risks involved in depending on the empirically derived parameters. The engineer of record remains responsible for the system operation and for creating a condition of pollution if it does not perform within permit limits.

**Subject:** FW: SOP-01028 & SOP-05039 Tennessee Wastewater Systems; SOP notification  
**From:** "Charles Hyatt" <charles.hyatt@adenus.com>  
**Date:** 9/9/2015 7:56 AM  
**To:** "'Roy Denney'" <roy.denney@adenus.com>, "Keith Townsend" <keith.townsend@adenus.com>

**From:** Elizabeth Rorie [mailto:Elizabeth.Rorie@tn.gov]  
**Sent:** Tuesday, September 8, 2015 3:45 PM  
**To:** 'Charles.Hyatt@adenus.com' <Charles.Hyatt@adenus.com>; 'brian.carter@adenus.com' <brian.carter@adenus.com>  
**Cc:** Hari Akunuri <Hari.Akunuri@tn.gov>; Wade Murphy <Wade.Murphy@tn.gov>; Adnan Bahour <Adnan.Bahour@tn.gov>; Allen Rather <Allen.Rather@tn.gov>; DWR NEFO <DWR.NEFO@tn.gov>; Michelle Ramsey <Michelle.Ramsey@tn.gov>  
**Subject:** SOP-01028 & SOP-05039 Tennessee Wastewater Systems; SOP notification

All,

This email is to acknowledge the receipt of 2 SOP applications. Check#: none / Check Amount: \$none. This email is a notification of receipt only and does not confirm or imply an authorization to operate. These documents have been uploaded to Waterlog. Correspondence received by TDEC becomes part of the public record and can be viewed here: [Water Resources Permits Dataviewer](#).

Bill of Rights for Permit Applicants (TCA §69-3-141)

- Ø You will be notified regarding the completeness of your application by the permit writer assigned to your application within 30 days of its submittal. However, if your application is a Notice of Intent (NOI) to be covered under one of our general permits, our expectation is that TDEC will not notify, but simply issue the Notice of Coverage (NOC) within 30 days.
- Ø Permit applicants shall have the right to know who will be reviewing their application and the time required to complete the full review process. Therefore, once applications are deemed complete, new or modified permits are to be issued or denied within 365 days, while

reissuances are to be issued or denied within 180 days, with an additional 90 days granted by request.

Please consider saving a copy of this email for your records.



**Beth Rorie** | Secretary  
DWR Permits  
Tennessee Tower, 11<sup>th</sup> Floor  
312 Rosa L. Parks Ave., Nashville, 37243  
p. 615-532-1172  
[elizabeth.rorie@tn.gov](mailto:elizabeth.rorie@tn.gov)  
[tn.gov/environment](http://tn.gov/environment)

Attachments:

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SOP-05039.APP.08-SEP-15.pdf	1.1 MB
SOP-01028.APP.08-SEP-15.pdf	1.1 MB





Tennessee Department of Environment and Conservation  
Division of Water Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, Tennessee 37243  
(615) 532-0625

Assoc. w/  
WPN # 14-0743R

### APPLICATION FOR A STATE OPERATION PERMIT (SOP)

Type of application: ☐ New Permit ☐ Permit Reissuance ☒ Permit Modification

Permittee Identification: (Name of city, town, industry, corporation, individual, etc., applying, according to the provisions of Tennessee Code Annotated Section 69-3-108 and Regulations of the Tennessee Water Quality Control Board.)

Permittee

Name **Tennessee Wastewater Systems, Inc.**  
(applicant):

Permittee  
Address: **851 Aviation Parkway Smyrna, TN 37167**

Official Contact: <b>Charles Hyatt</b>	Title or Position: <b>President</b>		
Mailing Address: <b>851 Aviation Parkway</b>	City: <b>Smyrna</b>	State: <b>TN</b>	Zip: <b>37167</b>
Phone number(s): <b>(615) 220-7200</b>	E-mail:		

Optional Contact: <b>Tracy Nichols</b>	Title or Position: <b>Operator</b>		
Address: <b>849 Aviation Parkway</b>	City: <b>Smyrna</b>	State: <b>TN</b>	Zip: <b>37167</b>
Phone number(s): <b>615-220-7200</b>	E-mail:		

Application Certification (must be signed in accordance with the requirements of Rule 1200-4-5-.05)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name and title; print or type	Signature	Date
<b>Charles Hyatt, President</b>		<b>9-3-15</b>

<b>Facility Identification:</b>		<b>Existing Permit No.</b> 7-039	
<b>Facility Name:</b>	<b>Cedar Hill Treatment Facility</b>	<b>County:</b>	<b>Robertson</b>
<b>Facility Address or Location:</b>	<b>Highway 41 - Cedar Hill Treatment Facility Cedar Hill, Tennessee 37032</b>	<b>Latitude:</b>	<b>36.573333</b>
		<b>Longitude:</b>	<b>87.978833</b>
<b>Name and distance to nearest receiving waters:</b> Little Buzzard Creek (800 feet approx.)			
<b>If any other State or Federal Water/Wastewater Permits have been obtained for this site, list their permit numbers:</b> N/A			
<b>Name of company or governmental entity that will operate the permitted system:</b> TWS, Inc.			
<b>Operator address:</b> 851 Aviation Parkway, Smyrna, TN 37167			
<b>Has the owner/operator filed for a Certificate of Convenience &amp; Necessity (CCN), or an amended CCN, with the Tennessee Regulatory Authority (TRA) (may be required for collection systems and land application treatment systems)?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A			
<b>If the applicant listed above does not yet own the facility/site or if the applicant will not be the operator, explain how and when the ownership will be transferred or describe the contractual arrangement and renewal terms of the contract for operations.</b> The TF is owned by TWS, Inc.			
<b>Complete the following information explaining the entity type, number of design units, and daily design wastewater flow:</b>			
<b>Entity Type</b>	<b>Number of Design Units</b>		<b>Flow (gpd)</b>
<input type="checkbox"/> City, town or county	<b>No. of connections:</b>		
<input type="checkbox"/> Subdivision	<b>No. of homes:</b>	<b>Avg. No. bedrooms per home:</b>	
<input type="checkbox"/> School	<b>No. of students:</b>	<b>Size of cafeteria(s):</b> <b>No. of showers:</b>	
<input type="checkbox"/> Apartment	<b>No. of units:</b>	<b>No. units with Washer/Dryer hookups:</b> <b>No. units without W/D hookups:</b>	
<input type="checkbox"/> Commercial Business	<b>No. of employees:</b>	<b>Type of business:</b>	
<input type="checkbox"/> Industry	<b>No. of employees:</b>	<b>Product(s) manufactured:</b>	
<input type="checkbox"/> Resort	<b>No. of units:</b>		
<input type="checkbox"/> Camp	<b>No. of hookups:</b>		
<input type="checkbox"/> RV Park	<b>No. of hookups:</b>	<b>No. of dump stations:</b>	
<input type="checkbox"/> Car Wash	<b>No. of bays:</b>		
<input checked="" type="checkbox"/> Other	<b>Regional Facility</b>	<b>Regional treatment and drip disposal</b>	<b>0.06 MGD</b>
<b>Describe the type and frequency of activities that result in wastewater generation.</b> Typical Domestic Wastewater - residential and light commercial development.			

<b>Engineering Report (required for collection systems and/or land application treatment systems):</b>	<input checked="" type="checkbox"/> N/A
<input type="checkbox"/> Prepared in accordance with Rule 1200-4-2-.03 and Section 1.2 of the Tennessee Design Criteria (see website for more information) <input checked="" type="checkbox"/> Attached, or <input type="checkbox"/> Previously submitted and entitled:	
Approved? <input type="checkbox"/> Yes. Date: <input type="checkbox"/> No	

<b>Wastewater Collection System:</b>	<input type="checkbox"/> N/A
System type (i.e., gravity, low pressure, vacuum, combination, etc.): Watertight effluent collection	
System Description: Septic tank effluent with small diameter PVC pipe and required fittings	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): Tanks have a minimum of 24-36 hours storage in the STEP tank. Heavy rains have a minimal impact on a watertight collection system. Small generators can be connected to the pump stations and treatment system as necessary during an extended power outage.	
In the event of a system failure describe means of operator notification: All pumps have redundancy & alarms.	
List the emergency contact(s) (name/phone): Tracy Nichols /615-220-7200	
For low-pressure systems, who is responsible for maintenance of STEP/STEG tanks and pumps or grinder pumps (list all contact information)? STEP and STEG tanks - Adenus Operations, 849 Aviation Parkway, Smyrna, TN 37167 (615) 220-7200	
Approximate length of sewer (excluding private service lateral): As required	
Number/hp of lift stations: 0 /	Number/hp of lift pumps 0/0
Number/volume of low pressure and or grinder pump tanks 0/0	
Number/volume septic tanks	As required/1,500 gallon
Attach a schematic of the collection system. <input type="checkbox"/> Attached	
If this is a satellite sewer and you are tying in to another sewer system complete the following section, listing tie-in points to the sewer system and their location (attach additional sheets as necessary):	
<u>Tie-in Point</u>	<u>Latitude (xx.xxxx°)</u>
<u>Longitude (xx.xxxx°)</u>	
N/A	

<b>Land Application Treatment System:</b>	<input type="checkbox"/> N/A
Type of Land Application Treatment System: <input checked="" type="checkbox"/> Drip <input type="checkbox"/> Spray <input type="checkbox"/> Other, explain:	
Type of treatment facility preceding land application (recirculating media filters, lagoons, other, etc.):	
Conversion from Deep Cell Facultative lagoon to Constructed Wetland	
Attach a treatment schematic. <input type="checkbox"/> Attached	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): Same as above	
For New or Modified Projects:	
Name of Developer for the project: Existing permit	
Developer address and phone number: Existing permit	
For land application, list: Proposed acreage involved: 6.88 +/- acres	
Inches/week gpd/sq.ft loading rate to be applied: 2.25 inches/week, 0.2 gpd/sf	
Is wastewater disinfection proposed?	
<input type="checkbox"/> Yes Describe land application area access:	
<input checked="" type="checkbox"/> No Describe how access to the land application area will be restricted: Fence	
<b>Attach required additional Engineering Report Information (see website for more information)</b>	
<input type="checkbox"/> Topographic map (1:24,000 scale presented at a six inch by six inch minimum size) showing the location of the project including quadrangle(s) name(s) GPS coordinates, and latitude and longitude in decimal degrees should also be included.	
<input type="checkbox"/> Scaled layout of facility showing the following: lots, buildings, etc. being served, the wastewater collection system routes, the pretreatment system location, the proposed land application area(s), roads, property boundaries, and sensitive areas such as streams, lakes, springs, wells, wellhead protection areas, sinkholes and wetlands.	
<input type="checkbox"/> Soils information for the proposed land disposal area in the form of a Water Pollution Control (WPC) Soils Map per Chapter 16 and 17 State of Tennessee Design Criteria for Sewage Work. The soils information should include soil depth (borings to a minimum of 4 feet or refusal) and soil profile description for each soil mapped.	
<input type="checkbox"/> Topographic map of the area where the wastewater is to be land applied with no greater than ten foot contours presented at a minimum size of 24 inches by 24 inches.	
<input type="checkbox"/> Describe alternative application methods based on the following priority rating: (1) connection to a municipal/public sewer system, (2) connection to a conventional subsurface disposal system as regulated by the Division of Groundwater Protection, and/or (3) land application.	

<b>For Drip Dispersal Systems Only:</b> Unless otherwise determined by the Department, sewage treatment effluent wells, i.e. large capacity treatment/drip dispersal systems after approval of the SOP Application, will be issued an UIC tracking number and will be authorized as Permit by Rule per UIC Rule 1200-4-6-.14(2) and upon issue of a State Operating Permit and Sewage System Construction Approval by the Department.	<input type="checkbox"/> N/A
<b>Describe the following:</b>	
The area of review (AOR) for each Drip Dispersal System shall, unless otherwise specified by the Department, consist of the area lying within a one mile radius or an area defined by using calculations under 1200-4-6-.09 of the Drip Dispersal System site or facility, and shall include, but not be limited to general surface geographic features, general subsurface geology, and general demographic and cultural features within the area. Attach to this part of the application a general characterization of the AOR, including the following: (This can be in narrative form)	
<input type="checkbox"/> A general description of all past and present groundwater uses as well as the general groundwater flow direction and general water quality.	
<input type="checkbox"/> A general description of the population and cultural development within the AOR (i.e. agricultural, commercial, residential or mixed)	
<input type="checkbox"/> Nature of injected fluid to include physical, chemical, biological or radiological characteristics.	
<input type="checkbox"/> If groundwater is used for drinking water within the area of review, then identify and locate on a topographic map all groundwater withdrawal points within the AOR, which supply public or private drinking water systems. Or supply map showing general location of publicly supplied water for the area (this can be obtained from the water provider)	
<input type="checkbox"/> If the proposed system is located within a wellhead protection area or source water protection area designated by Rule 1200-5-1-.34, show the boundary of the protection area on the facility site plan.	
<input type="checkbox"/> Description of system, Volume of injected fluid in gallons per day based upon design flow, including any monitoring wells	
<input type="checkbox"/> Nature and type of system, including installed dimensions of wells and construction materials	

<b>Pump and Haul:</b>	<input checked="" type="checkbox"/> N/A
Reason system cannot be served by public sewer:	
Distance to the nearest manhole where public sewer service is available:	
When sewer service will be available:	
Volume of holding tank:                      gal.	
Tennessee licensed septage hauler (attach copy of agreement):	
Facility accepting the septage (attach copy of acceptance letter):	
Latitude and Longitude (in decimal degrees) of approved manhole for discharge of septage:	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.):	

<b>Holding Ponds (for non-domestic wastewater only):</b>	<input checked="" type="checkbox"/> N/A
Pond use: <input type="checkbox"/> Recirculation <input type="checkbox"/> Sedimentation <input type="checkbox"/> Cooling <input type="checkbox"/> Other (describe):	
Describe pond use and operation:	
If the pond(s) are existing pond(s), what was the previous use?	
Have you prepared a plan to dispose of rainfall in excess of evaporation? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If so, describe disposal plan:	
Is the pond ever dewatered? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If so, describe the purpose for dewatering and procedures for disposal of wastewater and/or sludge:	
Is(are) the pond(s) aerated? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Volume of pond(s):	gal. Dimensions:
Is the pond lined (Note if this is a new pond system it must be lined for SOP coverage. Otherwise, you must apply for an Underground Injection Control permit.)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Describe the liner material (if soil liner is used give the compaction specifications):	
Is there an emergency overflow structure? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If so, provide a design drawing of structure.</i>	
Are monitoring wells or lysimeters installed near or around the pond(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If so, provide location information and describe monitoring protocols (attach additional sheets as necessary):</i>	

<b>Mobile Wash Operations:</b>		<input checked="" type="checkbox"/> N/A
<input type="checkbox"/> Individual Operator <input type="checkbox"/> Fleet Operation Operator		
<b>Indicate the type of equipment, vehicle, or structure to be washed during normal operations (check all that apply):</b>		
<input type="checkbox"/> Cars <input type="checkbox"/> Trucks <input type="checkbox"/> Trailers (Interior washing of dump-trailers, or tanks, is prohibited.) <input type="checkbox"/> Other (describe):	<input type="checkbox"/> Parking Lot(s):      sq. ft. <input type="checkbox"/> Windows:      sq. ft. <input type="checkbox"/> Structures (describe):	
<b>Wash operations take place at (check all that apply):</b>		
<input type="checkbox"/> Car sales lot(s) <input type="checkbox"/> Private industry lot(s) <input type="checkbox"/> County(ies), list:	<input type="checkbox"/> Public parking lot(s) <input type="checkbox"/> Private property(ies) <input type="checkbox"/> Statewide	
<b>Wash equipment description:</b>		
<input type="checkbox"/> Truck mounted <input type="checkbox"/> Rinse tank size(s) (gal.): <input type="checkbox"/> Collection tank size(s) (gal.):	<input type="checkbox"/> Trailer mounted <input type="checkbox"/> Mixed tanks size(s) (gal.): Number of tanks per vehicle:	
Pressure washer:      psi (rated)      gpm (rated) <input type="checkbox"/> gas powered <input type="checkbox"/> electric		
Vacuum system manufacturer/model:		Vacuum system capacity:      inches Hg
Describe any other method or system used to contain and collect wastewater:		
List the public sewer system where you are permitted or have written permission to discharge waste wash water (include a copy of the permit or permission letter):		
Are chemicals pre-mixed, prior to arriving at wash location? <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Describe all soaps, detergents, or other chemicals used in the wash operation (attach additional sheets as necessary):</b>		
Chemical name:	Manufacturer:	Primary CAS No. or Product No.



Tennessee Department of Environment and Conservation  
Division of Water Pollution Control  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, Tennessee 37243  
(615) 532-0625

Assoc. #1  
WPN # 14-0471R

### APPLICATION FOR A STATE OPERATION PERMIT (SOP)

Type of application: ☐ New Permit ☐ Permit Reissuance ☒ Permit Modification

**Permittee Identification:** (Name of city, town, industry, corporation, individual, etc., applying, according to the provisions of Tennessee Code Annotated Section 69-3-108 and Regulations of the Tennessee Water Quality Control Board.)

Permittee

Name **Tennessee Wastewater Systems, Inc.**  
(applicant):


Permittee  
Address: **851 Aviation Parkway Smyrna, TN 37167**

Official Contact: <b>Charles Hyatt</b>	Title or Position: <b>President</b>		
Mailing Address: <b>851 Aviation Parkway</b>	City: <b>Smyrna</b>	State: <b>TN</b>	Zip: <b>37167</b>
Phone number(s): <b>(615) 220-7200</b>	E-mail:		

Optional Contact: <b>Tracy Nichols</b>	Title or Position: <b>Operator</b>		
Address: <b>849 Aviation Parkway</b>	City: <b>Smyrna</b>	State: <b>TN</b>	Zip: <b>37167</b>
Phone number(s): <b>615-220-7200</b>	E-mail:		

**Application Certification** (must be signed in accordance with the requirements of Rule 1200-4-5-.05)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name and title; print or type <b>Charles Hyatt, President</b>	Signature 	Date <b>9-3-15</b>
--	---	-----------------------



<b>Facility Identification:</b>		<b>Existing Permit No.</b> 01028	
<b>Facility Name:</b>	<b>Maple Green Reclamation Facility</b>	<b>County:</b> Robertson	
<b>Facility Address or Location:</b>	<b>Off Henry Gower Road Coopertown, TN 37172</b>	<b>Latitude:</b> 36D26'19" <b>Longitude:</b> 86D59'42"	
<b>Name and distance to nearest receiving waters:</b> Millers Creek (Approx. 1550 LF)			
If any other State or Federal Water/Wastewater Permits have been obtained for this site, list their permit numbers: N/A			
Name of company or governmental entity that will operate the permitted system: TWS, Inc.			
Operator address: 851 Aviation Parkway, Smyrna, TN 37167			
Has the owner/operator filed for a Certificate of Convenience & Necessity (CCN), or an amended CCN, with the Tennessee Regulatory Authority (TRA) (may be required for collection systems and land application treatment systems)? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A			
If the applicant listed above does not yet own the facility/site or if the applicant will not be the operator, explain how and when the ownership will be transferred or describe the contractual arrangement and renewal terms of the contract for operations. The TF is owned by TWS, Inc.			
Complete the following information explaining the entity type, number of design units, and daily design wastewater flow:			
<u>Entity Type</u>	<u>Number of Design Units</u>		<u>Flow (gpd)</u>
<input type="checkbox"/> City, town or county	No. of connections:		
<input type="checkbox"/> Subdivision	No. of homes:	Avg. No. bedrooms per home:	
<input type="checkbox"/> School	No. of students:	Size of cafeteria(s): No. of showers:	
<input type="checkbox"/> Apartment	No. of units:	No. units with Washer/Dryer hookups: No. units without W/D hookups:	
<input type="checkbox"/> Commercial Business	No. of employees:	Type of business:	
<input type="checkbox"/> Industry	No. of employees:	Product(s) manufactured:	
<input type="checkbox"/> Resort	No. of units:		
<input type="checkbox"/> Camp	No. of hookups:		
<input type="checkbox"/> RV Park	No. of hookups:	No. of dump stations:	
<input type="checkbox"/> Car Wash	No. of bays:		
<input checked="" type="checkbox"/> Other	Regional Facility	Regional treatment and drip disposal	0.06 MGD
Describe the type and frequency of activities that result in wastewater generation. Typical Domestic Wastewater - residential and light commercial development.			

<b>Engineering Report (required for collection systems and/or land application treatment systems):</b>		<input checked="" type="checkbox"/> N/A
<input type="checkbox"/> Prepared in accordance with Rule 1200-4-2-.03 and Section 1.2 of the Tennessee Design Criteria (see <a href="#">website</a> for more information)		
<input type="checkbox"/> Attached, or		
<input checked="" type="checkbox"/> Previously submitted and entitled:		Approved? <input checked="" type="checkbox"/> Yes. Date: _____ <input type="checkbox"/> No

<b>Wastewater Collection System:</b>	<input type="checkbox"/> N/A
System type (i.e., gravity, low pressure, vacuum, combination, etc.): Watertight effluent collection	
System Description: 3", 4", 6", and 8" diameter SDR 21 PVC pressure pipe and required fittings	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): Tanks have a minimum of 24-36 hours storage in the STEP tank. Heavy rains have a minimal impact on a watertight collection system. Small generators can be connected to the pump stations and treatment system as necessary during an extended power outage.	
In the event of a system failure describe means of operator notification: All pumps have redundancy & alarms.	
List the emergency contact(s) (name/phone): Tracy Nichols /615-220-7200	
For low-pressure systems, who is responsible for maintenance of STEP/STEG tanks and pumps or grinder pumps (list all contact information)? STEP and STEG tanks - Adenus Operations, 849 Aviation Parkway, Smyrna, TN 37167 (615) 220-7200	
Approximate length of sewer (excluding private service lateral): As required	
Number/hp of lift stations: 0 /	Number/hp of lift pumps 0/0
Number/volume of low pressure and or grinder pump tanks 0/0	Number/volume septic tanks As required/1,500 gallon
Attach a schematic of the collection system. <input type="checkbox"/> Attached	
If this is a satellite sewer and you are tying in to another sewer system complete the following section, listing tie-in points to the sewer system and their location (attach additional sheets as necessary):	
<u>Tie-in Point</u>	<u>Latitude (xx.xxxx°)</u>
<u>Longitude (xx.xxxx°)</u>	
N/A	

<b>Land Application Treatment System:</b>		<input type="checkbox"/> N/A
Type of Land Application Treatment System: <input checked="" type="checkbox"/> Drip <input type="checkbox"/> Spray <input type="checkbox"/> Other, explain:		
Type of treatment facility preceding land application (recirculating media filters, lagoons, other, etc.)		
Conversion from Deep Cell Facultative lagoon to Constructed Wetland		
Attach a treatment schematic. <input type="checkbox"/> Attached		
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): Same as above		
For New or Modified Projects:		
Name of Developer for the project: Existing permit		
Developer address and phone number: Existing permit		
For land application, list:	Proposed acreage involved: ~6.70 +/- acres	
	Inches/week gpd/sq.ft loading rate to be applied: 2.25 inches/week, 0.2 gpd/sf	
Is wastewater disinfection proposed?		
<input type="checkbox"/> Yes Describe land application area access:		
<input checked="" type="checkbox"/> No Describe how access to the land application area will be restricted: Fence		
<b>Attach required additional Engineering Report Information (see <u>website</u> for more information)</b>		
<input type="checkbox"/> Topographic map (1:24,000 scale presented at a six inch by six inch minimum size) showing the location of the project including quadrangle(s) name(s) GPS coordinates, and latitude and longitude in decimal degrees should also be included.		
<input type="checkbox"/> Scaled layout of facility showing the following: lots, buildings, etc. being served, the wastewater collection system routes, the pretreatment system location, the proposed land application area(s), roads, property boundaries, and sensitive areas such as streams, lakes, springs, wells, wellhead protection areas, sinkholes and wetlands.		
<input type="checkbox"/> Soils information for the proposed land disposal area in the form of a Water Pollution Control (WPC) Soils Map per Chapter 16 and 17 State of Tennessee Design Criteria for Sewage Work. The soils information should include soil depth (borings to a minimum of 4 feet or refusal) and soil profile description for each soil mapped.		
<input type="checkbox"/> Topographic map of the area where the wastewater is to be land applied with no greater than ten foot contours presented at a minimum size of 24 inches by 24 inches.		
<input type="checkbox"/> Describe alternative application methods based on the following priority rating: (1) connection to a municipal/public sewer system, (2) connection to a conventional subsurface disposal system as regulated by the Division of Groundwater Protection, and/or (3) land application.		

**For Drip Dispersal Systems Only: Unless otherwise determined by the Department, sewage treatment effluent wells, i.e., large capacity treatment/drip dispersal systems after approval of the SOP Application, will be issued an UIC tracking number and will be authorized as Permit by Rule per UIC Rule 1200-4-6-.14(2) and upon issue of a State Operating Permit and Sewage System Construction Approval by the Department.**

☒ N/A

**Describe the following:**

The area of review (AOR) for each Drip Dispersal System shall, unless otherwise specified by the Department, consist of the area lying within a one mile radius or an area defined by using calculations under 1200-4-6-.09 of the Drip Dispersal System site or facility, and shall include, but not be limited to general surface geographic features, general subsurface geology, and general demographic and cultural features within the area. Attach to this part of the application a general characterization of the AOR, including the following: (This can be in narrative form)

- ☐ A general description of all past and present groundwater uses as well as the general groundwater flow direction and general water quality.
- ☐ A general description of the population and cultural development within the AOR (i.e. agricultural, commercial, residential or mixed)
- ☐ Nature of injected fluid to include physical, chemical, biological or radiological characteristics.
- ☐ If groundwater is used for drinking water within the area of review, then identify and locate on a topographic map all groundwater withdrawal points within the AOR, which supply public or private drinking water systems. Or supply map showing general location of publicly supplied water for the area (this can be obtained from the water provider)
- ☐ If the proposed system is located within a wellhead protection area or source water protection area designated by Rule 1200-5-1-.34, show the boundary of the protection area on the facility site plan.
- ☐ Description of system, Volume of injected fluid in gallons per day based upon design flow, including any monitoring wells
- ☐ Nature and type of system, including installed dimensions of wells and construction materials

**Pump and Haul:**

☒ N/A

Reason system cannot be served by public sewer:

Distance to the nearest manhole where public sewer service is available:

When sewer service will be available:

Volume of holding tank: \_\_\_\_\_ gal.

Tennessee licensed septage hauler (attach copy of agreement):

Facility accepting the septage (attach copy of acceptance letter):

Latitude and Longitude (in decimal degrees) of approved manhole for discharge of septage:

Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.):

<b>Holding Ponds (for non-domestic wastewater only):</b>	<input checked="" type="checkbox"/> N/A
Pond use: <input type="checkbox"/> Recirculation <input type="checkbox"/> Sedimentation <input type="checkbox"/> Cooling <input type="checkbox"/> Other (describe):	
Describe pond use and operation:	
If the pond(s) are existing pond(s), what was the previous use?	
Have you prepared a plan to dispose of rainfall in excess of evaporation? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If so, describe disposal plan:	
Is the pond ever dewatered? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If so, describe the purpose for dewatering and procedures for disposal of wastewater and/or sludge:	
Is(are) the pond(s) aerated? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Volume of pond(s):	gal. Dimensions:
Is the pond lined (Note if this is a new pond system it must be lined for SOP coverage. Otherwise, you must apply for an Underground Injection Control permit.)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Describe the liner material (if soil liner is used give the compaction specifications):	
Is there an emergency overflow structure? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If so, provide a design drawing of structure.</i>	
Are monitoring wells or lysimeters installed near or around the pond(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If so, provide location information and describe monitoring protocols (attach additional sheets as necessary):</i>	

<b>Mobile Wash Operations:</b>		<input checked="" type="checkbox"/> N/A
<input type="checkbox"/> Individual Operator <span style="margin-left: 200px;"><input type="checkbox"/> Fleet Operation Operator</span>		
<b>Indicate the type of equipment, vehicle, or structure to be washed during normal operations (check all that apply):</b>		
<input type="checkbox"/> Cars <input type="checkbox"/> Trucks <input type="checkbox"/> Trailers (Interior washing of dump-trailers, or tanks, is prohibited.) <input type="checkbox"/> Other (describe):	<input type="checkbox"/> Parking Lot(s):          sq. ft. <input type="checkbox"/> Windows:                  sq. ft. <input type="checkbox"/> Structures (describe):	
<b>Wash operations take place at (check all that apply):</b>		
<input type="checkbox"/> Car sales lot(s) <input type="checkbox"/> Private industry lot(s) <input type="checkbox"/> County(ies), list:	<input type="checkbox"/> Public parking lot(s) <input type="checkbox"/> Private property(ies) <input type="checkbox"/> Statewide	
<b>Wash equipment description:</b>		
<input type="checkbox"/> Truck mounted <input type="checkbox"/> Rinse tank size(s) (gal.): <input type="checkbox"/> Collection tank size(s) (gal.):	<input type="checkbox"/> Trailer mounted <input type="checkbox"/> Mixed tanks size(s) (gal.): Number of tanks per vehicle:	
Pressure washer:          psi (rated)          gpm (rated) <input type="checkbox"/> gas powered <input type="checkbox"/> electric		
Vacuum system manufacturer/model:		Vacuum system capacity:          inches Hg
Describe any other method or system used to contain and collect wastewater:		
List the public sewer system where you are permitted or have written permission to discharge waste wash water (include a copy of the permit or permission letter):		
Are chemicals pre-mixed, prior to arriving at wash location? <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Describe all soaps, detergents, or other chemicals used in the wash operation (attach additional sheets as necessary):</b>		
Chemical name:	Manufacturer:	Primary CAS No. or Product No.

**Subject:** 150909\_GCG to Pickney\_FW: 150904\_Site Observation - Summit View

**From:** George Garden <George.Garden@tn.gov>

**Date:** 9/9/2015 9:40 AM

**To:** "Bob Pickney (bob.pickney@adenus.com)" <bob.pickney@adenus.com>

**CC:** "Roy.denney@adenus.com" <Roy.denney@adenus.com>

Please make any comments on observations or agreements from last Friday. Thanks for helping out on the visit. I hope things are moving along.



**George C Garden, P.E. BCCE** | Chief Engineer

Division of Water Resources

Wm R Snodgrass Tennessee Tower, Floor 11

312 Rosa L. Parks Ave.

Nashville, TN 37243

p. 615-253-9934 c. 615-416-0164

[george.garden@tn.gov](mailto:george.garden@tn.gov)

[tn.gov/environment](http://tn.gov/environment)

—Attachments: —

150908\_SITE OBSERVATION REPORT.docx

16.3 KB

## SITE OBSERVATION REPORT

September 8, 2015

**Date; Time:** 9/4/2015; 11:00 AM to approximately 1:00 PM EDT

**Location:** Summit View Development Wastewater System (SOP 06035)

**Attending:** Bob Pickney, P.E., Esq. (Adenus/TWSI); David Beverly, P.E. (Summit View HOA); Michael Caudill (TDEC-Knoxville EFO); Billy Roach (TDEC-East TN); George Garden, P.E. BCEE (TDEC-Nashville)

**Purpose of visit:** Determine options for replacement/augmentation of drip emitter land application system and investigate piping and construction occurring during the previous week as requested by the Homeowners Association.

### **Observations:**

- Accurate property lines and the original soil map was not available, however, TWSI is still looking to retrieve them. The existing dispersal field is poorly located and utilizes the lowest section of the property available for land application. Even after a relatively dry 2 weeks, semi-aquatic plants were flourishing and the soil was visibly wet to exhibiting standing water especially on the lower sections. The dispersal field was placed with emitter hose not on contour in a drainage swale which has become a repository for more storm-water drainage as the site was developed. Down gradient from the dispersal area, the existing pond looked eutrophic but not clogged with algae probably due to the fountain in the center of the pond. The pond dam was found to be leaking and water was running down an unimproved road toward the proposed drip dispersal additional zone.
- The RSF system looked to be working well with no odor or ponding from overloading or excessive solids. UV disinfection was present. The control system is utilized to dose at a rate proportional to the chamber recirc zone elevations.
- A large portion of the unutilized area of the existing property that could be used for a dispersal zone expansion was very steep and wooded. Drip emitter hose installations on 4'-5' centers would be the only option on a majority of the site. Utilization of the sloped portions of the site will not reduce the area of the existing site that is wet; but should improve the quality of the water standing in the low portions. A drain of this area more directly to the pond could be considered if recent data on in-situ soil treatment can be substantiated.
- The soil bores were taken in the Whitwell soils area of the proposed additional site. It appeared that a significant portion of the Whitwell profile could have over 20" of soil without evidence of extended periods of submergence.
- Although there was no one present with firsthand knowledge of the events resulting in the complaint, the explanation by the TWSI operator provided on 9/3/2015 seemed reasonable for our observations. The piping modifications reported by the Homeowners' Association did not involve the water system but the septic system of Cabin 11. The construction was authorized by a homeowner and the water situation was created by filling the new replaced septic tanks for



their leak test. Loss of water pressure occurred due to filling the tank at a rate higher than the system pumps could restore.

**Action Items:**

- TWSI:
  - Bush-hog proposed site and have certified soil scientist confirm amount of Whitwell soils meeting Division criteria.
  - Utilize all available acceptable soils for dispersal on site and propose redesign for land application system.
  - Follow other requirements from letter dated August 28, 2015.
- TDEC:
  - Billy Roach to review soils work as soon as possible after completion.

**This memo reflects my best recollection of the observations and agreements made on site. Attendees should provide comments/corrections as soon as possible.**

**George Garden, P.E. BCEE**

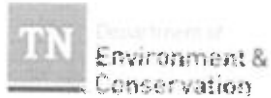
**Subject:** 150911\_Cedar Hill & Maple Green

**From:** George Garden <George.Garden@tn.gov>

**Date:** 9/11/2015 3:39 PM

**To:** "Roy.denney@adenus.com" <Roy.denney@adenus.com>

I'm going to get out letters to satisfy the legal beagles on Monday. I have to check on the status of the previous land app sites to complete the permit. I'm working on it now.



**George C Garden, P.E. BCEE** | Chief Engineer

Division of Water Resources

Wm R Snodgrass Tennessee Tower, Floor 11

312 Rosa L. Parks Ave.

Nashville, TN 37243

p. 615-253-9934 c. 615-416-0164

[george.garden@tn.gov](mailto:george.garden@tn.gov)

[tn.gov/environment](http://tn.gov/environment)

**Subject:** SOP-05039 Cedar Hill Treatment Facility

**From:** Hari Akunuri <Hari.Akunuri@tn.gov>

**Date:** 9/25/2015 12:59 PM

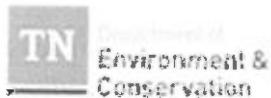
**To:** "Charles.Hyatt@adenus.com" <Charles.Hyatt@adenus.com>

**CC:** Michelle Ramsey <Michelle.Ramsey@tn.gov>, Ann Morbitt <Ann.Morbitt@tn.gov>, Patsy Fulton <Patsy.Fulton@tn.gov>, "Roy Denney" (roy.denney@adenus.com)" <roy.denney@adenus.com>, Jessica Murphy <Jessica.Murphy@tn.gov>, Brad Harris <Brad.Harris@tn.gov>, Wade Murphy <Wade.Murphy@tn.gov>, George Garden <George.Garden@tn.gov>, George Bell <George.Bell@tn.gov>

All,

The attachment is correspondence from TDEC. If you have trouble opening it, please let me know. We do not plan to send out a paper copy unless you instruct us otherwise. If you have questions about the contents of the document, please contact me.

Please consider saving a copy of this email for your records.



Hari Akunuri

TDEC/DWR

William R. Snodgrass Tennessee Towers

312 Rosa L. Park Avenue, 11<sup>th</sup> Floor

Nashville, TN 37243

Email: [Hari.Akunuri@tn.gov](mailto:Hari.Akunuri@tn.gov)

Office: (615)532-0650

Fax: (615)532-0683

We accept and encourage electronic document submittals.

Attachments:

---

SOP-05039 Cedar Hill and DWR Project 14-0763R.pdf

118 KB



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER RESOURCES  
William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, Tennessee 37243-1102

September 25, 2015

Mr. Charles R. Hyatt  
CEO  
Adenus Group, LLC  
e-copy: Charles.Hyatt@adenus.com  
849 Aviation Parkway  
Smyrna, TN 37167

**Subject: State Operating Permit No. (SOP-05039); DWR Project 14-0763R  
TN Wastewater Systems - Cedar Hill Treatment Facility - Wetland Remediation  
Cedar Hill, Robertson County, Tennessee**

Dear Mr. Hyatt:

The Division received a revised Application for a State Operating Permit Modification (SOP 05039) as well as plans and engineering report for replacement of the existing lagoon system with a Free Surface Wetland prior to the existing drip emitter land application system in Robertson County, TN dated September 8, 2015. Modifications requested by the Division via conversations and emails from the original plans, engineering, and permit modification request submission were addressed in a satisfactory manner. The existing facility is permitted to collect, treat and disperse 75,000 gallons per day of domestic wastewater but the lagoon treatment system must be replaced. The permit modification requested a decrease in the permit to 60,000 gpd to be achieved by two phases of 30,000 gpd wetlands and was accompanied by plans for two 30,000 gpd wetlands to accommodate this flow. Additional information on the requested action is discussed in order below:

**1. SOP 05039 Modification Request**

The SOP modification requests a reduction in flow from 75,000 gpd to 60,000 gpd, the latter amount achieved by construction of a second wetland cell. The existing land disposal site is rated at 63,000 gpd. A revised permit will be drafted and placed on public notice for the 30 day public comment period as soon as the information on the drip field requested below is received. The permit will stipulate that, assuming the first wetland is performing satisfactorily in accordance with the permit, the second wetland must be constructed and placed in operation by the time that the average daily flow during the portion of the year when the school is in session reaches 24,000 gpd or 80% design capacity. Our records do not show a copy of the land application zones, topography, and soils for the existing disposal field were received or retained. Please provide the as-built plans for the drip fields currently installed prior to our issuing the draft permit.

**2. Plans and Engineering Report**

Plans submitted for the free surface wetland meet the agreed upon standards for this type wetland as prescribed by *Natural Systems for Wastewater Treatment* (3<sup>rd</sup> Edition) Manual of Practice No. FD-16, Water Environment Federation 2010. The plans have been reviewed by the Division and conditionally found to be satisfactory to support construction of the free surface wetland treatment facility and for the new system to be integrated into the existing collection, treatment and disposal system. Final stamped and approved plans will be provided

Page 2  
TN Wastewater Systems – Cedar Hill Treatment Facility – Wetland Remediation  
SOP-05039

pending the results of the public comment process for the SOP. This correspondence does not constitute final plans approval and therefore does not support commencement of construction.

You should be aware that in accordance with TDEC Rule 0400-40-05-.05 (2), your receipt of this correspondence does not preclude the division from later requesting additional material that subsequent to the notice of completeness is determined to be necessary for permit processing.

If you have questions, please contact the Nashville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at [Hari.Akunuri@tn.gov](mailto:Hari.Akunuri@tn.gov).

Sincerely,



George C. Garden, P.E. BCEE  
Chief Engineer

cc: Permit Section File  
Nashville Environmental Field Office  
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, [michelle.ramsey@tn.gov](mailto:michelle.ramsey@tn.gov)  
Mr. Roy Denney, Chief Technical Officer, Adenus Group LLC, [roy.denney@adenus.com](mailto:roy.denney@adenus.com)  
Ms. Jessica Murphy, Compliance and Enforcement Manager, Division of Water Resources; [jessica.murphy@tn.gov](mailto:jessica.murphy@tn.gov)  
Mr. George Bell, Esq., Office of General Council, Tennessee Department of Environment and Conservation; [george.bell@tn.gov](mailto:george.bell@tn.gov)

**Subject:** SOP-01028 Maple Green Reclamation Facility

**From:** Hari Akunuri <Hari.Akunuri@tn.gov>

**Date:** 9/25/2015 1:17 PM

**To:** "Charles.Hyatt@adenus.com" <Charles.Hyatt@adenus.com>

**CC:** Ann Morbitt <Ann.Morbitt@tn.gov>, Brad Harris <Brad.Harris@tn.gov>, "Wade Murphy" <Wade.Murphy@tn.gov>, Michelle Ramsey <Michelle.Ramsey@tn.gov>, "Patsy Fulton" <Patsy.Fulton@tn.gov>, "'Roy Denney' (roy.denney@adenus.com)" <roy.denney@adenus.com>, George Garden <George.Garden@tn.gov>

All,

The attachment is correspondence from TDEC. If you have trouble opening it, please let me know. We do not plan to send out a paper copy unless you instruct us otherwise. If you have questions about the contents of the document, please contact me.

Please consider saving a copy of this email for your records.



Hari Akunuri

TDEC/DWR

William R. Snodgrass Tennessee Towers

312 Rosa L. Park Avenue, 11<sup>th</sup> Floor

Nashville, TN 37243

Email: [Hari.Akunuri@tn.gov](mailto:Hari.Akunuri@tn.gov)

Office: (615)532-0650

Fax: (615)532-0683

We accept and encourage electronic document submittals.

Attachments: \_\_\_\_\_

SOP-01028 Maple Green and DWR Project 14-047.pdf

115 KB



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF WATER RESOURCES

William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, Tennessee 37243-1102

September 25, 2015

Mr. Charles R. Hyatt  
CEO  
Adenus Group, LLC  
e-copy: Charles.Hyatt@adenus.com  
849 Aviation Parkway  
Smyrna, TN 37167

**Subject: State Operating Permit No. (SOP-01028); DWR Project 14-0471R  
TN Wastewater Systems - Maple Green Reclamation Facility - Remediation Wetland  
Coopertown, Robertson County, Tennessee**

Dear Mr. Hyatt:

The Division received a revised Application for a State Operating Permit Modification (SOP 01028) as well as plans and engineering report for replacement of the existing lagoon system with Free Surface Wetlands in Robertson County, TN dated September 8, 2015. Modifications to the original plans, engineering report, and application for permit modification, requested by the Division via conversations and emails, were addressed in a satisfactory although incomplete manner. The existing facility is permitted to collect and treat 74,000 gallons per day of domestic wastewater but the lagoon treatment system must be replaced and the disposal area increased to achieve this permit level. The permit modification requests a decrease in the permit to 60,000 gpd to be achieved by implementation of two 30,000 gpd wetlands. The required addition disposal area is under consideration at this time. Specific review items are discussed in order below:

1. SOP 01028 Modification Request

The SOP modification requests a reduction in flow from 74,000 gpd to 60,000 gpd achieved by construction of a two wetland system. The existing drip area has been approved for 32,580 gpd and an additional land disposal site is being assessed. A revised permit will be drafted and placed on public notice for the 30 day public comment period as soon as the final documentation on the additional field area has been received and approved. The modification will include a reduction in permitted capacity of 60,000 gpd and a change to the treatment process from lagoon to free water surface wetland.

2. Plans and Engineering Report

Plans and process documentation submitted for the free surface wetland meet the agreed upon standards for this type wetland as prescribed by *Natural Systems for Wastewater Treatment* (3<sup>rd</sup> Edition) Manual of Practice No. FD-16, Water Environment Federation 2010. Documentation of the new disposal area should be provided include piping from the wetlands to the disc filters, floor plan and modifications to the disc filter building, piping to the disposal zones, and a disposal area map with zones, controls valves, topographic information, and soil information. The wetland treatment plans have been reviewed by the Division and found to be conditionally satisfactory. Final stamped and approved plans will be provided pending the results of the public comment process for the SOP modification and the integration of the approved additional disposal area to

match the treatment capacity of 60,000 gpd. This correspondence does not constitute final plans approval and therefore does not support commencement of construction.

You should be aware that in accordance with TDEC Rule 0400-40-05-.05 (2), your receipt of this correspondence does not preclude the division from later requesting additional material that subsequent to the notice of completeness is determined to be necessary for permit processing.

If you have questions, please contact the Nashville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at [Hari.Akunuri@tn.gov](mailto:Hari.Akunuri@tn.gov).

Sincerely,



George C. Garden, P.E. BCEE  
Chief Engineer

cc: Permit Section File  
Nashville Environmental Field Office  
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, [michelle.ramsey@tn.gov](mailto:michelle.ramsey@tn.gov)  
Mr. Roy Denney, Chief Technical Officer, Adenus Group LLC, [roy.denney@adenus.com](mailto:roy.denney@adenus.com)





**TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION**  
**DIVISION OF WATER RESOURCES**  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

9/17/2015

**CERTIFIED MAIL**  
**7099 3220 0007 9315 1732**  
**Return Receipt Requested**

Mr. Charles Hyatt  
President  
Tennessee Wastewater Systems, Inc.  
e-copy: Charles.hyatt@adenus.com  
849 Aviation Pkwy.  
Smyrna, TN 37167

**Re: Notice of Violation**  
Compliance Inspection  
Tennessee Wastewater Systems, Inc.  
Smoky Village Treatment Facility  
UIC# SEV 0000069 SOP05033  
Sevier County

Mr. Hyatt:

On 3/14/2014 Allen Rather conducted a Compliance Inspection of the Smoky Village Treatment Facility. He met John Czahoroski with Adenus to review the operation of the system. Mr. Rather reported that the drip field was saturated with partially treated wastewater ponding and overflowing from the site to a drain and under the road. A re-inspection of the site was performed on 8/14/2014 to determine if corrective action had been taken. Partially treated wastewater was still ponding and overflowing from the site at that time. A further re-inspection was conducted on 7/20/2015 that found that the site still was experiencing ponding.

Ponding and overflow from the site is a violation of your State Operation permit, and of the Water Quality Control Act. This letter will serve to formally notify you of these violations as identified on the above-listed dates and by copy will inform our Enforcement Section of the violations. This NOV is not a legal action in itself, but such violations may lead to enforcement action.

It is the DWR understanding that additional soils area was secured to install new drip fields over two years ago. Plans were submitted and approved by the DWR, however construction has not begun. Since construction did not commence within one year of the plans approval, the plans are subject to

Mr. Charles Hyatt  
Tennessee Wastewater Systems, Inc.  
9/17/2015  
Page 2

reevaluation. As requested in E. Joseph Sanders' letter to Jeff Ridsen, Esq., TWSI is urged to promptly re-submit construction plans to the division in accordance with applicable rules and guidance.

The site appears to be in a state of constant violation. You are requested to provide a written response to this office within thirty (30) days of receipt of this letter outlining a definite timetable for implementation of corrective action once plans are resubmitted and approved.

If you have any questions, please contact Allen Rather by phone at 615-532-5819 or [allen.rather@tn.gov](mailto:allen.rather@tn.gov).

Sincerely,



Brad C. Harris, P.E.  
Land-Based Systems Unit Manager  
Division of Water Resources

cc: Jessica Murphy, Compliance & Enforcement Section, DWR  
George Garden, P.E., DWR  
Michael Caudill, Knoxville EFO, DWR



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION  
**DIVISION OF WATER RESOURCES**  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

9/17/2015

**CERTIFIED MAIL**  
**7099 3220 0007 9315 1732**  
**Return Receipt Requested**

Mr. Charles Hyatt  
President  
Tennessee Wastewater Systems, Inc.  
e-copy: Charles.hyatt@adenus.com  
849 Aviation Pkwy.  
Smyrna, TN 37167

**Re: Notice of Violation**  
Compliance Inspection  
Tennessee Wastewater Systems, Inc.  
Starr Crest I Treatment Facility  
UIC# SEV0000074 SOP-00019  
Sevier County

Mr. Hyatt:

On 8/15/2014 Mr. Allen Rather conducted a Compliance Inspection of the Starr Crest I Treatment Facility. He met with John Czahoroski with TWSI to review the operation of the system. There was no fence or UV disinfection at this site at the time of the visit. On 7/20/2015 a re-inspection of the facility was performed by Mr. Rather and Mr. Fali Kapadia to determine if any corrective actions had been taken. No fence or UV disinfection was present and evidence of ponding from was reported at the site at that time of the inspection.

Failure to disinfect the treated effluent or provide a fence to inhibit public access is a violation of your State Operation Permit (SOP), and of the Water Quality Control Act. This letter will serve to formally notify you of the violations as identified on the above-listed dates and by copy will inform our Enforcement Section of the violations. This NOV is not a legal action in itself, but such violations may lead to enforcement action.

Since the July 20<sup>th</sup> inspection by Mr. Rather and Mr. Kapadia, Mr. John Czahorioski with Tennessee Wastewater Systems Incorporated has submitted a response on August 19<sup>th</sup> to the inspection report prepared by Mr. Rather. Mr. Czahorioski stated in his response that since the time of the July 20<sup>th</sup> visit that a new drip field had been installed that includes a discharge flush circuit.

Mr. Charles Hyatt  
Tennessee Wastewater Systems, Inc.  
9/17/2015  
Page 2

While DWR acknowledges TWSI's reported effort to correct the ongoing violations, installation of a new drip field and discharge flush circuit should have been supported by the plan submission and approval process as outlined in Chapter 0400-40-02.

As-built drawings of the new drip field should be submitted to this office within thirty (30) days of receipt of this letter. DWR intends to conduct a follow up inspection of the site upon receipt. The DWR will contact Mr. Czahorioski to schedule the re-inspection.

If you have any questions regarding this matter, please contact Allen Rather by phone at 615-532-5819 or at [allen.rather@tn.gov](mailto:allen.rather@tn.gov).

Sincerely,



Brad C. Harris, P.E.  
Land-Based Systems Unit Manager  
Division of Water Resources

cc: Jessica Murphy, Compliance & Enforcement Section, DWR  
George Garden, P.E., DWR  
Michael Caudill, Knoxville EFO, DWR



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION  
**DIVISION OF WATER RESOURCES**  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

9/17/2015

**CERTIFIED MAIL**  
**7099 3220 0007 9315 1732**  
**Return Receipt Requested**

Mr. Charles Hyatt  
President  
Tennessee Wastewater Systems, Inc.  
e-copy: charles.hyatt@adenus.com  
849 Aviation Pkwy.  
Smyrna, TN 37167

Re: **Notice of Violation**  
Compliance Inspection  
Tennessee Wastewater Systems, Inc.  
Starr Crest II Treatment Facility  
UIC# SEV 0000073 SOP-01033  
Sevier County

Mr. Hyatt:

On 8/14/2014 Allen Rather and Fali Kapadia conducted a Compliance Inspection of the Starr Crest II Treatment Facility. They met John Czahoroski with Adenus to review the operation of the system. At that time, effluent was overflowing from the pump and recirculation tanks into a drain and flowing towards Upper Middle Creek. The site has telemetry and did send a high water alarm to Adenus on 8/12/2014 but the cause wasn't investigated until the site visit. A re-inspection of the site was performed on 7/20/2015 to determine what corrective action had been initiated. There was evidence that the system had overflowed from the tanks as previously noted, however, on the day of inspection, no overflow from the tanks was observed. Several broke/chewed lines were observed in the drip field with treated wastewater flowing to a drain in the bottom of the hollow. The area had been fenced to prevent public access.

Overflow from the site resulting in a discharge to the Waters of the State is a violation of your State Operation permit, and of the Water Quality Control Act. This letter will serve to formally notify you of these violations as identified on the above-listed dates and by copy will inform our Enforcement Section of the violations. This NOV is not a legal action in itself, but such violations may lead to enforcement action.

Mr. Charles Hyatt  
Tennessee Wastewater Systems, Inc.  
9/17/2015  
Page 2

Since the July 20<sup>th</sup> inspection by Mr. Rather and Mr. Kapadia, Mr. John Czahorioski with Tennessee Wastewater Systems Incorporated submitted a response on August 19<sup>th</sup> to the inspection report prepared by Mr. Rather. Mr. Czahorioski stated in his response that UV disinfection was added in 2014 and since the time of the July 20<sup>th</sup> visit that several pieces of drip pipe have been repaired. He also noted that a four strand barbed wire fence had been completed surrounding the drip field.

The DWR recognizes the maintenance items that have been addressed; however, it doesn't appear that any actions have been taken to prevent the chronic overflows that the site has repeatedly experienced.

It is requested that a written response be submitted to this office within thirty (30) days of receipt of this letter, stating the necessary corrective action and a well-defined timeframe for correction.

If you have any questions or need further assistance, please contact Allen Rather by phone at 615-532-5819 or [allen.rather@tn.gov](mailto:allen.rather@tn.gov).

Sincerely,



Brad C. Harris, P.E.  
Manager, Land Based Systems  
Division of Water Resources

cc: Jessica Murphy, Compliance & Enforcement Section, DWR  
George Garden, P.E., DWR  
Michael Caudill, Knoxville EFO, DWR



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION  
**DIVISION OF WATER RESOURCES**  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

9/17/2015

**CERTIFIED MAIL**  
**7099 3220 0007 9315 1732**  
**Return Receipt Requested**

Mr. Charles Hyatt  
President  
Tennessee Wastewater Systems, Inc.  
e-copy: charles.hyatt@adenus.com  
849 Aviation Pkwy.  
Smyrna, TN 37167

Re: **Notice of Violation**  
Compliance Inspection  
Tennessee Wastewater Systems, Inc.  
Swan Harbor Subdivision  
UIC BLO 0000048 SOP-99024  
Roane County

Mr. Hyatt:

On 3/04/2014 Knoxville EFO staff conducted a Compliance Inspection of the Swan Harbor Subdivision. At that time ponding was noted in the drip field. On 9/05/2014 Knoxville staff re-inspected the facility and observed ponding once again. On 7/20/2015 Allen Rather and Fali Kapadia conducted a site visit to determine if corrective action had been made. Ponding was still present at one location near a valve box in the lower portion of the drip field.

Your State Operating Permit states: "In addition, the drip irrigation system must be operated in a manner preventing the creation of a public health hazard or a public/private nuisance."

Failure to operate the system in accordance with the conditions of the permit is a violation of your State Operation permit, and of the Water Quality Control Act. This letter will serve to formally notify you of the violations as identified on the above-listed dates and by copy will inform our Enforcement Section of the violations. This NOV is not a legal action in itself, but such violations may lead to enforcement action.

Since the July 20<sup>th</sup> inspection by Mr. Rather and Mr. Kapadia, Mr. John Czahorioski with Tennessee Wastewater Systems Incorporated (TWSI) has submitted a response on August 19<sup>th</sup> to the inspection report prepared by Mr. Rather. Mr. Czahorioski stated in his response that since the time of the July 20<sup>th</sup> visit that a cracked return line has been repaired in the area of the drip field where the ponding most recently occurred.

Mr. Charles Hyatt  
Tennessee Wastewater Systems, Inc.  
9/17/2015  
Page 2

DWR acknowledges the effort made by TWSI to repair the return line. DWR intends to conduct a follow up inspection of the site. DWR will contact Mr. Czahorioski to schedule the re-inspection.

If you have any questions, or need further assistance, please contact Allen Rather by phone at 615-532-5819 or [allen.rather@tn.gov](mailto:allen.rather@tn.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Brad C. Harris", with a stylized flourish at the end.

Brad C. Harris, P.E.  
Manager, Land Based Systems  
Division of Water Resources

cc: Jessica Murphy, Compliance & Enforcement Section, DWR  
George Garden, P.E., DWR  
Michael Caudill, Knoxville EFO, DWR





TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION  
**DIVISION OF WATER RESOURCES**  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

9/17/2015

**CERTIFIED MAIL**  
**7099 3220 0007 9315 1732**  
**Return Receipt Requested**

Mr. Charles Hyatt  
President  
Tennessee Wastewater Systems, Inc.  
e-copy: charles.hyatt@adenus.com  
849 Aviation Pkwy.  
Smyrna, TN 37167

Re: **Notice of Violation**  
Compliance Inspection  
Tennessee Wastewater Systems, Inc.  
Tall Oak Acres  
UIC# BLO 0000048 SOP-99024  
Blount County

Mr. Hyatt:

On 2/14/2014 Knoxville EFO staff conducted a Compliance Inspection of the Tall Oak Acres Facility. Staff met with John Czahoroski with Adenus to review the operation of the system. Areas of ponding were noted over the lower portion of the drip field. A re-inspection was performed by Mr. Allen Rather and Mr. Fali Kapadia on August 15, 2014 which showed continued ponding. On 7/20/2015 a re-inspection of the facility was again performed by Mr. Rather and Mr. Fali Kapadia to determine if any corrective actions had been taken. Ponding was still present at the site at the time of the visit.

Your State Operating Permit states: "In addition, the drip irrigation system must be operated in a manner preventing the creation of a public health hazard or a public/private nuisance."

Failure to operate the system in accordance with the conditions of the permit is a violation of your State Operation permit, and of the Water Quality Control Act. This letter will serve to formally notify you of the violations as identified on the above-listed dates and by copy will inform our Enforcement Section of the violations. This NOV is not a legal action in itself, but such violations may lead to enforcement action.

Since the July 20<sup>th</sup> inspection by Mr. Rather and Mr. Kapadia, Mr. John Czahorioski with Tennessee Wastewater Systems Incorporated has submitted a response on August 19<sup>th</sup> to the inspection report prepared by Mr. Rather. Mr. Czahorioski stated in his response that since the time of the July 20<sup>th</sup> visit that several repairs to leaking drip tubing have been made. It is unclear from Mr. Czahorioski's response if the repairs have been successful.

Mr. Charles Hyatt  
Tennessee Wastewater Systems, Inc.  
9/17/2015  
Page 2

DWR acknowledges the effort made by TWSI to repair leaking drip tubing. DWR intends to conduct a follow up inspection of the site. DWR will contact Mr. Czahorioski to schedule the re-inspection.

If there is information in addition to that provided by Mr. Czahorioski a written response should be submitted to this office within thirty (30) days of receipt of this letter.

If you have any questions, or need further assistance, please contact Allen Rather by phone at 615-532-5819 or [allen.rather@tn.gov](mailto:allen.rather@tn.gov).

Sincerely,



Brad C. Harris, P.E.  
Manager, Land Based Systems  
Division of Water Resources

cc:

Jessica Murphy, Compliance & Enforcement Section, DWR  
George Garden, P.E., DWR  
Michael Caudill, Knoxville EFO, DWR



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION  
**DIVISION OF WATER RESOURCES**  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue  
Nashville, TN 37243

9/17/2015

**CERTIFIED MAIL**  
**7099 3220 0007 9315 1732**  
**Return Receipt Requested**

Mr. Charles Hyatt  
President  
Tennessee Wastewater Systems, Inc.  
e-copy: charles.hyatt@adenus.com  
849 Aviation Pkwy.  
Smyrna, TN 37167

**Re: Notice of Violation**  
Compliance Inspection  
Tennessee Wastewater Systems, Inc.  
Townsend Town Square  
UIC# BLO 0000069 SOP-99016  
Blount County

Mr. Hyatt:

On 2/28/2014 Knoxville EFO staff conducted a compliance inspection of the Townsend Town Square Facility. At that time they reported ponding over the entire area of the drip site. On 8/13/2014 Mr. Allen Rather and Mr. Fali Kapadia met with John Czahorioski with Adenus to review the operation of the system. The system was experiencing ponding and overflowing issues which resulted in partially treated wastewater flowing into the road ditch which flows to a nearby stream. On 7/20/2015 Mr. Allen Rather and Mr. Fali Kapadia again conducted a re-inspection to determine if any corrective actions had been taken. The drip field area had been fenced but ponding issues were still found at the time of their visit.

Overflow of partially treated wastewater from the site is a violation of your State Operation permit, and of the Water Quality Control Act. This letter will serve to formally notify you of the violations as identified on the above-listed dates and by copy will inform our Enforcement Section of the violations. This NOV is not a legal action in itself, but such violations may lead to enforcement action.

Since the July 20<sup>th</sup> inspection by Mr. Rather and Mr. Kapadia, Mr. John Czahorioski with Tennessee Wastewater Services Incorporated has submitted a response on August 19<sup>th</sup> to the inspection report prepared by Mr. Rather. Mr. Czahorioski stated in his response that the pumping, filtering and flow control equipment was upgraded in 2014. He also stated since the time of the July 20<sup>th</sup> visit that a new drip field had been installed that includes a discharge flush circuit.

Mr. Charles Hyatt  
Tennessee Wastewater Systems, Inc.  
9/17/2015  
Page 2

While DWR acknowledges TWSI's reported effort to correct the ongoing violations, installation of a new drip field and discharge flush circuit should have been supported by the plan submission and approval process as outlined in Chapter 0400-40-02.

As-built drawings of the new drip field should be submitted to this office within thirty (30) days of receipt of this letter. DWR intends to conduct a follow up inspection of the site upon receipt. The DWR will contact Mr. Czahorioski to schedule the re-inspection.

If you have any questions, or need further assistance, please contact Allen Rather by phone at 615-532-5819 or [allen.rather@tn.gov](mailto:allen.rather@tn.gov).

Sincerely,



Brad C. Harris, P.E.  
Manager, Land Based Systems  
Division of Water Resources

cc: Jessica Murphy, Compliance & Enforcement Section, DWR  
George Garden, P.E., DWR  
Michael Caudill, Knoxville EFO, DWR