

851 Aviation Parkway Smyrna, TN 37167

May 3, 2016

Mr. David Foster, Chief Utilities Division Tennessee Regulatory Authority 502 Deaderick Street, 4th 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 Risden General Counsel



Tennessee Wastewater Systems, Inc. Docket 15-00025 May 2016 Report Overview

Systems subject to Notice of Violations and other Corrective Orders:

Starr Crest I (NOV) - Repairs made; awaiting inspection by TDEC

Starr Crest II (NOV) – Repairs made; awaiting inspection by TDEC – Financing Petition in Docket 16-00007 was denied by the TRA. HOA and TWSI are working on alternative plans for financing the repairs.

Smoky Village (NOV) - Part of 14-00136 Docket - TDEC will inspect once system upgrades are complete.

Townsend Square (NOV) - Repairs made; awaiting inspection by TDEC

Summit View – Part of the 14-00136 Docket – TDEC will inspect once system upgrades are complete.

Cedar Hill - Part of the 14-00136 Docket

Maple Green (NOV) – Part of the 14-00136 Docket

From:

HAWKMS Agent <agent@hawkms.com>

Sent:

Sunday, May 1, 2016 4:57 PM

To:

Charles Hyatt; Brian Carter; Roy Denney

Cc:

Jeff Risden; Bob Pickney; Matt Pickney

Subject:

TRA KPI Compliance Report for 5/1/2016 4:57:09 PM

TRA Flow KPI Report for 4/30/2016

Tracy Nichols	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Cedar Hill DCP	75000			0.00		i i
Maple Green DCP	74000	39223	45850	1.17	44111.00	ii.

Tony Smith	Permitted	Expected	SP Gal	Actual	% of Expected	AvgFloy
Swan Harbour RSF	15800	1575	0	2541	1.61	238
Tall Oaks RSF	45000	12075	0	8540	0.71	990

Jeramy Stewart	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Starr Crest I RSF	8000	2275	1873	0.82	2232.46	iko:
Starr Crest II BC	28000	25550	-10546	-0.41	-1873.86	
Summit View RSF	8000	5775	4630	0.80	5915.67	-

Stone Hanson	Permitted	Expected	Actual	% of Expected	AvgFlow	% 0
Townsend Town Square RSF	3640	3640	3423	0.94	1683.07	

From:

Matt Pickney

Sent:

Monday, May 2, 2016 8:14 AM

To:

Bob Pickney; Charles Hyatt; Chris Phillips; Roy Denney

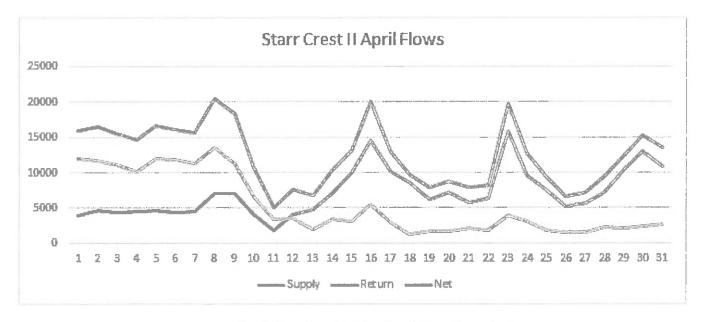
Cc:

Jeff Risden

Subject:

FW: TRA KPI Compliance Report for 5/1/2016 4:57:09 PM

I noticed that the Starr Crest II numbers are still reporting negative values. The following chart shows what was locally reported off of the flow log:



Based off of my interpretation of the local data, here is what should have been included on the TRA report. Looks like the 4/30 data was off by a factor of 10 and we swapped out the flow meter mid day on 4/10, so I took the average of 4/11-4/30 and adjusted by a factor of 10 to get the 25,300 monthly average:

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Starr Crest II BC	28000	25550	25970	1.01	25300
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I plan on working with Chris on reconciling this discrepancy today but I did want to share this info with you before shipping the report out to the TRA.

Thanks,



HAWKMS/Adenus Group, LLC | 851 Aviation Pkwy, Smyrna, TN 37167

Direct: +1 615.220.7157 | Toll Free: +1 888.4.ADENUS Ext: 157 | Mobile: +1 615.351.0302 | Fax: 615.220.7207

From: HAWKMS Agent [mailto:agent@hawkms.com]

Sent: Sunday, May 01, 2016 4:57 PM

To: Charles Hyatt < Charles. Hyatt@Adenus.com>; Brian Carter < Brian. Carter@Adenus.com>; Roy Denney

<Roy.Denney@Adenus.com>

Cc: Jeff Risden <Jeff.Risden@Adenus.com>; Bob Pickney <Bob.Pickney@Adenus.com>; Matt Pickney

<Matt.Pickney@Adenus.com>

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Stone Hanson	Permitted	Expected	Actual	% of Expected	AvgFlow	% 0
Townsend Town Square RSF	3640	3640	3423	0.94	1683.07	

From:

Roy Denney

Sent:

Monday, May 2, 2016 8:08 AM

To: Subject: Jeff Risden

Attachments:

FW: Starr Crest II.pdf

From: Allen Rather [mailto:Allen.Rather@tn.gov]

Sent: Monday, April 25, 2016 11:01 AM

To: Roy Denney <Roy.Denney@Adenus.com>

Cc: Brad Harris <Brad.Harris@tn.gov>; Hari Akunuri <Hari.Akunuri@tn.gov>; George Garden <George.Garden@tn.gov>;

Michael Atchley < Michael. Atchley@tn.gov>

Subject: Starr Crest II

Roy,

Attached is my review of the SOP modification application and engineering report. We need some additional information before we can complete the processing your request.

Thanks,

Allen Rather, LPSS Land Based Systems Unit Division of Water Resources 615-532-5819



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

4/25/2016

Roy Denney, P.E. CTO Adenus Group e-copy: roy.denney@adenus.com Address: 849 Aviation Way

Smyrna, TN 37167

Subject:

County: Sevier

Project: Starr Crest II SOP-01033

Dear Mr. Denney:

The Division of Water Resources recently conducted a review of the SOP modification application and engineering report for the above referenced site. The engineering report did not address all the criteria relevant to the proposal.

The system is currently permitted for 12,000 gpd flow. The proposal is to increase the capacity to 60,000 gpd by adding two Bioclere 30/32 units and additional drip dispersal area. The additional soils area submitted is supportive of approximately 30,000 gpd at .25gpd/ft2. In order to process your request, we need soils information on the original dispersal site detailing the area available with a scaled layout of the initial system and the proposed area for additional drip. Also, since the concern is peak flows, consideration for mass balance as described in Chapter 1 Design Criteria needs to be addressed.

Chapter 1. Section 1.2.5.5 "The Division requires the submittal of a mass balance for all plants. The mass balances must include loadings to each unit process, operations, including all recycle, and side stream flows. Mass balances must include the following initial and design operating conditions: maximum, minimum, and average flow, BOD and suspended solids loadings; and maximum, minimum, and average nutrient loadings, especially nitrogen for plants with considerable industrial loadings and/or where nutrient removal (is a consideration)."

Also Chapter 1, Section 1.2.3.8 states: "An evaluation of alternative solutions and the rationale for recommending the chosen alternative, considering economics of operations and effectiveness and all costs over the life-cycle of the final project..."

Further, all of the property in question is currently owned by the Starr Crest Home Owner's Association. Consequently, you must provide either proof of ownership or a legal deeded easement for the property where the existing system is installed and the proposed area for the modification. At a minimum, the SOP application states: "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 contractrual arrangement and renewal terms of the contract for operations."

If you have any questions, please contact me at 615-532-5819 or by email at allen.rather@tn.gov.

Sincerely,

Allen Rather

Land-Based Systems

cc: Water-Based Systems File

alle Rother

Mr. Michael Atchley, Unit Manager, TDEC Division of Water Resources, Michael.Atchley@tn.gov

From:

Roy Denney

Sent:

Monday, May 2, 2016 8:09 AM

To:

Jeff Risden

Subject:

FW: Starr Crest II

From: Allen Rather [mailto:Allen.Rather@tn.gov]

Sent: Monday, April 25, 2016 3:46 PM

To: Roy Denney <Roy.Denney@Adenus.com>

Subject: RE: Starr Crest II

Roy,

I'll be out of the office tomorrow. I'll look into it Wednesday when I get back.

Thanks,

Allen

From: Roy Denney [Roy.Denney@Adenus.com]

Sent: Monday, April 25, 2016 2:41 PM

To: Allen Rather

Subject: RE: Starr Crest II

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

Allan,

I've been looking through trying to figure out where the 12,000GPD number came into the picture and I can't find it, I've attached the soil map showing the information on the original field. The pipe was laid on contour there. It's listed as lot 56-1 on the maps I've seen it called out. It's about 3.3 Acres existing areas. It is shown in the site layout it the forthcoming set.

The sheet set shows the new 1Q equalization tank which should resolve peek flow issues, as well as two more 30/32 Biocleres. We should be sending those in this week.

There are no industrial loads for this site.

The site has 2 Biocleres. Due to constraints on compatible technology and comparable pricing with other decentralized solutions, other alternatives were not evaluated.

We will require an easement upon execution of the contract to complete buildout with the HOA, this contract is still being developed. This is in part reliant on the TRA approving such contract.

If there are any other questions, please let me know,

Thank you,

Roy Denney

From: Allen Rather [mailto:Allen.Rather@tn.gov]

Sent: Monday, April 25, 2016 11:01 AM

To: Roy Denney < Roy. Denney@Adenus.com >

Cc: Brad Harris < Brad. Harris@tn.gov >; Hari Akunuri < Hari. Akunuri@tn.gov >; George Garden < George. Garden@tn.gov >;

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Allen Rather, LPSS Land Based Systems Unit Division of Water Resources 615-532-5819

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40108					<u> </u>				FACILITY: Summit View Resort	Resort	SOP NO.:	06036	
MONTHE	Y OPERATION	DIVISION OF WALER FULLUTION CONTROL. MONTHLY OPERATING PERMITS	VIROL State oper	RATING PER	SMITS				PERMITEE: Tennessee W. CITY: Sevierville	Termessee Wastewater Systems, Inc. Sevierville	MONTHIYEAR:	Mar 2016 Sevier	
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3TA0	TIME OF	WASTEWATER FLOW (gpd)	N 28 AINOMMA Ngm	Ngm (ह) GOS	1gm (8) GO60	E-COLI	N 22 STASTIN Ngm	SST (Ngm)	Please document import	Please document important events such as discharges of untreated westewater, down equipment or please document quality.	s of untreated we	nstewater, dc ty.	wn equipment or
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							-	Ī	condition that the authorities of the				
ACTUAL,	ACTUAL AVG VALUE	AN.	NA N	NA.		NA	-		Coordance with approved proce	county uses the amount at accusate and complete. I further certify that all sampling was performed in accordance with approved procedurate and all analyses were parformed in accordance with an CFR Dec 15s. I am extensi	rther certify that all a sed in accordance wi	templing was part of the control of	arformed in
									hare are algorificant penalities for	aubmitting false information, includin	og the possibility of the	The end Imprise	ermoent.
PERMIT	PERMIT MAX LIMIT	REPORT	REPORT	45		1776			SIGNATURE OF OPERATOR	OR JANNA	\{	DATE 4	4/8/2018
ACTURAL	ACTION MANAGEMENT												
ACIUM	MAX VALUE	6,300	14	Q		Q.	H	Ī	LICENSE NUMBER 152	15279	PHONE	(615) 220-7200	200
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TENEM SE	NO OFTION ATTORIO	Totalizaer	ą.	Que Que		Grath		<i>y</i>	SIGNATURE OF PRINCIPAL				
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0 15	5	wn equipment or plant																																	Performed in Part 136, 1 am ewere	f Imprisonment.	4.13-16		-7200			4-NK16	- 11
SOP NO.: 05039 MONTHYEAR: Mar 2016 COUNTY Robustons		comments ABOUT OPERATION AND COMPLANCE t events such as discharges of untrasted wastewater, do upsets which may effect effluent quality.																							.Y FLOW'S (gpd)		FLOW	No Discharge in Date		No Discharge to Date		No Discharge to Oats			numer certify that all sampling was ormed in accordance with 40 CFR i	. including the possibility of fine and	PATE		PHONE (815) 220-7200	LABORATORY (ISED		Ma DATE	
Ceder Hill Treatment Facility Tennessee Wastewater Systems, inc. Ceder Hill		COMMENTS ABOUT OPERATION AND COMPLÂNCE Please document important events such as discharges of untrasted wastewater, down equipment or plant upsets which may effect effluent quality.																							AVERAGE MONTHLY FLOWS (gpd)		MONTH	Jenuary		Pobruary		March		Cometion is accused and many	accoccance with approved procedures and all emables were performed in accordance with 40 CFR Part 136. I am every that there are storifficant periodice for a performation.		MATOR	1chul	10070	E LABORATORY No		JIPAL A. A.	
FACILITY: Cedar H PERMITEE: Tenness CITY: Cedar H		Please document imp																																Cartify that the submitted in	accordance with approved p that there are significant per		SIGNATURE OF OPERATOR	CENTRAL MARKET	AND TOTAL	ANALYSIS BY OUTSIDE LABORATORY		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER	
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		N ss 3TARTII	N																																		7	0.00		1/quanter	drab	0	
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TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION DIVISION OF WATER POLLUTION CONTROL MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS		RETAWETSAW (bqg) WOJ9																															a		#DIA/GI	REPORT		0	1/month		totalized		
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