



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 Ridsen
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

Jeff Ridsen

From: HAWKMS Agent <agent@hawkms.com>
Sent: Sunday, May 1, 2016 4:57 PM
To: Charles Hyatt; Brian Carter; Roy Denney
Cc: Jeff Ridsen; 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	18036	0	0.00	1189.00	
Maple Green DCP	74000	39223	45850	1.17	44111.00	

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

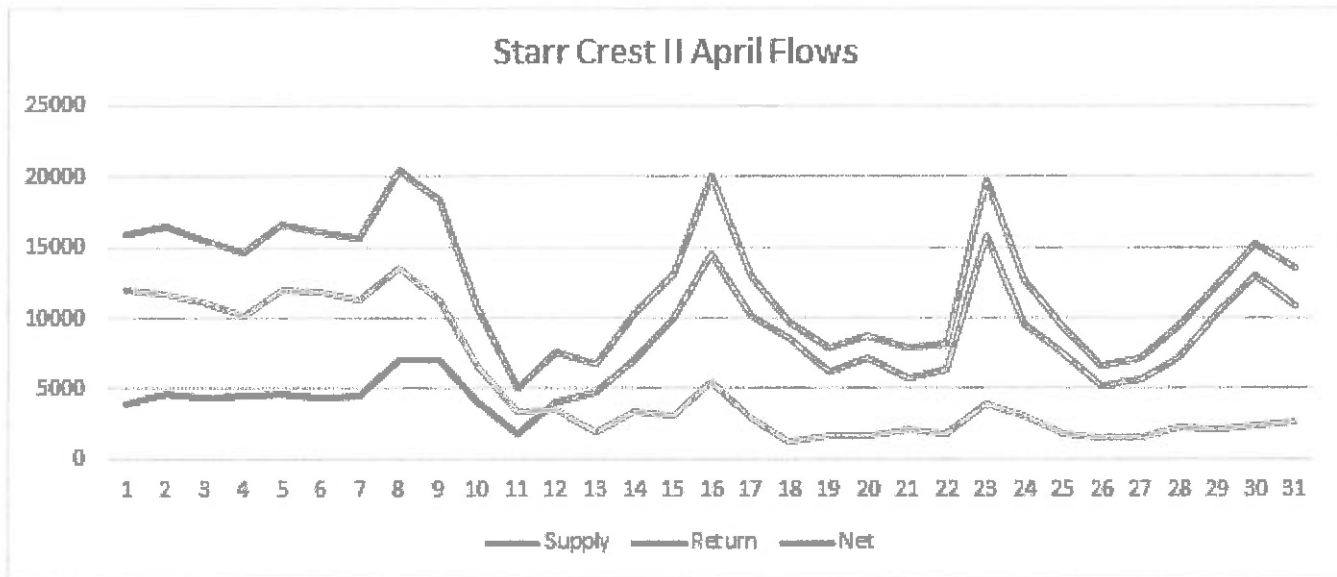
Jeramy Stewart	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Starr Crest I RSF	8000	2275	1873	0.82	2232.46	
Starr Crest II BC	28000	25550	-10546	-0.41	-1873.86	
Summit View RSF	8000	5775	4630	0.80	5915.67	

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

Jeff Ridsen

From: Matt Pickney
Sent: Monday, May 2, 2016 8:14 AM
To: Bob Pickney; Charles Hyatt; Chris Phillips; Roy Denney
Cc: Jeff Ridsen
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:

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,

Adenus
Matt Pickney
DEVELOPMENT LEAD

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 Riden <Jeff.Riden@Adenus.com>; Bob Pickney <Bob.Pickney@Adenus.com>; Matt Pickney <Matt.Pickney@Adenus.com>

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

TRA Flow KPI Report for 4/30/2016

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Townsend Town Square RSF	3640	3640	3423	0.94	1683.07	

Jeff Ridsen

From: Roy Denney
Sent: Monday, May 2, 2016 8:08 AM
To: Jeff Ridsen
Subject: FW: Starr Crest II
Attachments: 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 contractual 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,

A handwritten signature in dark ink that reads "Allen Rather". The signature is written in a cursive style with a large initial "A".

Allen Rather
Land-Based Systems

cc: Water-Based Systems File
Mr. Michael Atchley, Unit Manager, TDEC Division of Water Resources, Micheal.Atchley@tn.gov

Jeff Ridsen

From: Roy Denney
Sent: Monday, May 2, 2016 8:09 AM
To: Jeff Ridsen
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 peak 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>; Michael Atchley <Michael.Atchley@tn.gov>

Subject: Starr Crest II

Roy,

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Thanks,

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

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY:	Smoky Village Subfillment	SOP NO.:	05033
PERMITEE:	Tennessee Wastewater Systems, Inc.	MONTH/YEAR:	Feb 20
CITY:	Kodak	COUNTY:	Sevier

INERTIA

DATE	TIME OF SAMPLING	WASTEWATER FLOW (gpd)	AMMONIA as N mg/l	BOD (5) mg/l	CBOD (5) mg/l	E-COL (colonyes/100ml)	NITRATE as N mg/l	TSS (mg/l)
1								
2								
3								
4								
5								
6								
7								
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9								
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12								
13								
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27								
28								
28								
30								
31								
TOTAL								

AVERAGE MONTHLY FLOWS (GPD)

MONTH	FLOW
January	4,082
February	4,716
March	2,547

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR

LICENSE NUMBER 1621 **PHONE** (615) 220-7200

ANALYSIS BY OUTSIDE LABORATORY	Yes	LABORATORY USED	Microbac

SIGNATURE OF PRINCIPAL
EXECUTIVE OFFICER

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

DIVISION OF WATER POLLUTION CONTROL

MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY: Townsend Town Square

PERMITTEE: Tennessee Wastewater Systems, Inc.

CITY: Townsend

SOP NO.: 99016

MONTH/YEAR: Jan 2016

COUNTY: Blount

TIME OF SAMPLING

DATE

WASTEWATER FLOW (gpd)

AMMONIA as N (mg/l)

BOD (5) (mg/l)

CBOD (5) (mg/l)

F-COL (colonies/100ml)

NITRATE as N (mg/l)

TSS (mg/l)

1

2

3

4

5

6

7

8

9

10

11

12

13

14

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16

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21

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2:12 PM

See Flows

3.52

8.60

13,000

COMMENTS ABOUT OPERATION AND COMPLIANCE

Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may effect effluent quality.

Site Is Fenced

A chain link fence was installed around the drip field in January 2016 and a permit mod has been applied for.

AVERAGE MONTHLY FLOWS (GPD)

MONTH	FLOW
Jan	554
Feb	898
Mar	1,024

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR

DATE

14079

PHONE (615) 220-7200

Yes

LABORATORY USED Microbac

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER

DATE 4-11-16

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY: Cedar Hill Treatment Facility
 PERMITEE: Tennessee Wastewater Systems, Inc.
 CITY: Cedar Hill
 SOP NO.: 05039
 MONTH/YEAR: Mar 2016
 COUNTY: Robertson

DATE	TIME OF SAMPLING	EFFLUENT						WASTEWATER FLOW (gpd)	AMMONIA as N (mg/l)	BOD (5) (mg/l)	CBOD (5) (mg/l)	E-COLI (colonies/100ml)	NITRATE as N (mg/l)	TSS (mg/l)	COMMENTS ABOUT OPERATION AND COMPLIANCE
1															
2															
3															
4															
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29															
30															
31															
TOTAL								0							

AVERAGE MONTHLY FLOWS (gpd)

MONTH	FLOW
January	No Discharge to Date
February	No Discharge to Date
March	No Discharge to Date

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR: [Signature] DATE: 4-13-16
 LICENSE NUMBER: 15646 PHONE: (915) 220-7200
 ANALYSIS BY OUTSIDE LABORATORY: No LABORATORY USED: _____
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER: [Signature] DATE: 4-14-16

**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER POLLUTION CONTROL
MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS**

FACILITY: Maple Green Reclamation Facility SOP NO.: 01028
 PERMITTEE: Tennessee Wastewater Systems, Inc. MONTH/YEAR: Feb 2018
 CITY: Cooperstown COUNTY: Robertson

COMMENTS ABOUT OPERATION AND COMPLIANCE									
Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may effect effluent quality.									

MONTH	FLOW
January	50,000
February	70,000
March	82,000

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR: [Signature] DATE: 4-13-16
 LICENSE NUMBER: 15046 PHONE: (615) 230-7200
 ANALYSIS BY OUTSIDE LABORATORY: Yes LABORATORY USED: Microbac
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER: [Signature] DATE: 4-14-16