



Tennessee Wastewater Systems, Inc.  
Docket 15-00025  
March 2017 Report Overview

Systems subject to Notice of Violations and other Corrective Orders:

**Starr Crest II (NOV)** – Repairs made. TDEC has issued the modified SOP and approved the construction plans for upgraded system. Awaiting final agreement with HOA on assessments so that work can begin. TDEC will inspect once system upgrades are complete.

**Smoky Village (NOV)** – Docket 16-00096 – TDEC will inspect once system upgrades are complete.

**Summit View** – Docket 14-00136 – TDEC has rescinded the approval of the construction plans for the system expansion, however most of the drip had been replaced and/or relayed prior to TDEC notifying TWSI of its decision. The SOP remains under appeal by the HOA.

**Cedar Hill** – Docket 16-00096 - TDEC will inspect once system upgrades are complete.

**Maple Green (NOV)** – Docket 16-00096 – TDEC will inspect once system upgrades are complete.

**River Road\*** (NOV) – TWSI responded to the NOV and provided a CAP as requested.

\* River Road is not included in the KPI Report because there is no discharge from the facility and is not monitored.

**Jeff Riden**

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**From:** HAWKMS Agent <agent@hawkms.com>  
**Sent:** Wednesday, March 1, 2017 7:50 AM  
**To:** Charles Hyatt; Brian Carter; Roy Denney  
**Cc:** Jeff Riden; Bob Pickney; Matt Pickney  
**Subject:** TRA KPI Compliance Report for 3/1/2017 7:50:06 AM

## TRA Flow KPI Report for 2/28/2017

Tracy Nichols	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Cedar Hill DCP	75000	18036	0	0.00	0.00	
Maple Green DCP	74000	39923	52400	1.31	47230.00	

Jeremy Stewart	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Starr Crest II BC	28000	23625	15343	0.65	15911.43	
Summit View RSF	8000	5600	3630	0.65	5941.67	

Brandon Dotson	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Smoky Village RSF	5600	4900	1771	0.36	2470.60	



**State Of Tennessee**  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**  
William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11<sup>th</sup> Floor  
Nashville, Tennessee 37243-1102

February 16, 2017

**CERTIFIED MAIL**  
7099 3220 0007 9314 6608  
Return Receipt Requested

Mr. Keith Townsend  
Project Manager  
Adenus Group, LLC  
e-copy: [keith.townsend@adenus.com](mailto:keith.townsend@adenus.com)  
849 Aviation Pkwy.  
Smyrna, TN 37167

Subject: County: Sevier  
Wastewater Project Number: 15-0223 SOP-06035  
Project: Summit View Treatment Facility

Dear Mr. Townsend:

In correspondence dated December 5, 2016, the Tennessee Department of Environment and Conservation, Division of Water Resources ("DWR"), granted construction approval for the aforementioned project. Said project proposed the addition of a duplicate sand filter treatment area, reworked and expanded the existing drip emitter land application area, and provided additional area on an adjacent property for drip emitter land application. Pursuant to Tenn. Code. Ann. §69-3-108 (h), this letter rescinds the approval for the construction project 15-0223 until certain conditions are met and may result in the modification of SOP-06035.

In pertinent part, Tenn. Code. Ann. §69-3-108 (h) states, "The commissioner may revoke, suspend or modify any permit for cause, including: (1) Violation any terms or conditions of the permit or of any provision of this part; (2) Obtaining the permit by misrepresentation or failing to disclose fully all relevant facts; or (3) A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge." While comparing the use of available properties for the treatment plant and land application areas, it was subsequently discovered that significant differences exist in the location of the proposed expanded land application zones in your submissions to DWR. This calls into question whether the proposed sites are available to Tennessee Wastewater Systems, Inc. ("TWSI").

DWR has no conventional Tennessee state plane survey of the property utilized by TWSI. Plans submitted in July and September, the latter being approved by the Division, were apparently based on County tax maps and significant deviations in the UTM based original survey. Variations between the July and September plans submitted by TWSI reflect unaccounted for expansion of the land available for use. Both the July and September plans reflect more property than the original survey. It appears that existing installed drip fields are not affected by the property line discrepancies.

Please provide surveys with property boundaries certified by a registered land surveyor and matching deed descriptions for all property owned or proposed for use by TWSI at the Summit View property. The new survey should show the location all existing systems and constitute record drawings for the site as of this date.

Provide deed, easements or other agreements that authorize TWSI to use specified property for the treatment plant and land application areas currently being utilized and matching the detailed survey.

Proposed drip zones and expansion construction shall be shown on separate sheets with 5 foot or more accurate contour spacing and property boundaries accurately depicted. Drip zones shall be shown superimposed on approved soil surveys with pit locations shown on the proposed new drip area. Proposed construction shall be indicated with existing features screened back as in conventionally produced site drawings.

The currently proposed or modified construction plans will be reconsidered upon clarification of the accurate boundaries, existing site plan and land application areas available to TWSI. Modifications in the construction approval and the State Operating Permit based on the new plans may be warranted.

To expedite matters, please reference the assigned wastewater project number 15-0223 on any future correspondence. If we may be of assistance, please feel free to contact Mr. George Garden, P.E., BCEE at (615) 253-9934 or by e-mail at [george.garden@tn.gov](mailto:george.garden@tn.gov).

Sincerely,



Mr. Brad Harris, P.E.  
Manager, Land-Based Systems

Cc: Ms. Tisha Calabrese-Benton, Director, Division of Water Resources, [Tisha.Calabrese@tn.gov](mailto:Tisha.Calabrese@tn.gov)  
Mr. Charles R. Hyatt, CEO, Adenus Group, LLC [Charles.Hyatt@adenus.com](mailto:Charles.Hyatt@adenus.com)  
Mr. Roy Denny, PE, Williamson County, [RoyD@williamson-tn.org](mailto:RoyD@williamson-tn.org)  
Mr. Marshall Fall, PE, Chief Technical Officer, Adenus Group, [Marshall.Fall@adenus.com](mailto:Marshall.Fall@adenus.com)  
Mr. Michael Atchley, TDEC Division of Water Resources, [Michael.Atchley@tn.gov](mailto:Michael.Atchley@tn.gov)  
Mr. Kevin Dean, Attorney, Fraantz, McConnell & Seymour LLP, [kdean@fmsllp.com](mailto:kdean@fmsllp.com)  
Ms. Michelle Ramsey, Utilities Division, TRA, [Michelle.Ramsey@tn.gov](mailto:Michelle.Ramsey@tn.gov)  
Ms. Patsy Fulton, Utility Rate Specialist, TRA, [Patsy.Fulton@tn.gov](mailto:Patsy.Fulton@tn.gov)

**From:** [Hari Akunuri](#)  
**To:** [Allen Rather](#); [Elizabeth Rorie](#)  
**Subject:** FW: SOP Renewal Applications e-mail 2 of 5  
**Date:** Monday, February 13, 2017 10:10:59 AM  
**Attachments:** [image004.png](#)

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Please up load to WL.

Thanks,

Hari



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.

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**From:** Marshall Fall [mailto:[marshall.fall@adenus.com](mailto:marshall.fall@adenus.com)]  
**Sent:** Monday, February 13, 2017 9:41 AM  
**To:** Hari Akunuri  
**Cc:** Keith Townsend; David Foster  
**Subject:** SOP Renewal Applications e-mail 2 of 5

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

Dear Hari,

Please find attached the SOP renewal application for the following facilities:

SOP-01009	Tennessee Wastewater Systems, Inc. - Jackson Bend Subdivision
SOP-00018	Tennessee Wastewater Systems, Inc. - Eagle Crest Resorts
SOP-06035	Tennessee Wastewater Systems, Inc. - Summit View Resort

A check in the amount of \$8,000 has mailed to TDEC. If you have any questions, please feel free to contact me.

Thanks,

**Adenus**  
**Marshall Fall, P.E.**  
Chief Technical Officer

Adenus Group, LLC | 849 Aviation Pkwy, Smyrna, TN 37167  
Direct: +1 615.220.7195 | Mobile: +1 615.428.0923 | Fax: 615.220.7207



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

**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: **849 Aviation Parkway Smyrna, TN 37167**

Official Contact:

**Charles Hyatt**

Title or Position:

**President**

Mailing Address:

**849 Aviation Parkway**

City:

**Smyrna**

State:

**TN**

Zip:

**37167**

Phone number(s):

**615-220-7200**

E-mail:

Optional Contact:

**Jeremy Stewart**

Title or Position:

**Operator**

Address:

**849 Aviation Parkway**

City:

**Smyrna**

State:

**TN**

Zip:

**37167**

Phone number(s):

**615-220-7200**

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

**Charles Hyatt, President**

Signature

*C. R. Hyatt*

Date

**2-8-17**

<b>Facility Identification:</b>		<b>Existing Permit No.</b> 06035	
Facility Name: <b>Summit View Resort</b>		County: <b>Sevier</b>	
Facility Address or Location: <b>Sevierville, TN</b>		Latitude: <b>35.8155556N</b>	
		Longitude: <b>83.479444W</b>	
Name and distance to nearest receiving waters: <b>Unnamed tributary of Middle Creek 50'</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>Tennessee Wastewater Systems, Inc.</b>			
Operator address: <b>849 Aviation Parkway, Smyrna, TN 37167</b>			
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. <b>Applicant owns the site.</b>			
<b>Complete the following information explaining the entity type, number of design units, and daily design wastewater flow:</b>			
<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: 0	
<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 checked="" type="checkbox"/> Resort	No. of units:		<b>17,500</b>
<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 type="checkbox"/> Other			
Describe the type and frequency of activities that result in wastewater generation. <b>Rental Cabins</b>			



<b>Engineering Report (required for collection systems and/or land application treatment systems):</b>	<input 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 type="checkbox"/> Attached, or <input checked="" type="checkbox"/> Previously submitted and entitled: <b>Summit View Eng. Rpt.</b> Approved? <input checked="" type="checkbox"/> Yes. Date: 11/1/2006 <input type="checkbox"/> No	

<b>Wastewater Collection System:</b>	<input type="checkbox"/> N/A
System type (i.e., gravity, low pressure, vacuum, combination, etc.): <b>STEP/STEG small diameter sewer system</b>	
System Description: <b>STEP/STEG small diameter sewer system</b>	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): <b>Tanks and sewers are watertight. There are no bypass points in the system. TWSI also has emergency generators to run the pumps.</b>	
In the event of a system failure describe means of operator notification: <b>Cellular telemetry notification</b>	
List the <b>emergency</b> contact(s) (name/phone): <b>Jeramy Stewart – 615-220-7200</b>	
For low-pressure systems, who is responsible for maintenance of STEP/STEG tanks and pumps or grinder pumps (list all contact information)? <b>There are no grinder pumps. All notifications come to TWSI at 615-220-7200</b>	
Approximate length of sewer (excluding private service lateral): <b>~4,200 ft</b>	
Number/hp of lift stations: <b>0 /0</b>	Number/hp of lift pumps <b>0/0</b>
Number/volume of low pressure and or grinder pump tanks <b>0/0</b>	
Number/volume septic tanks	<b>as needed / 1,500</b>
Attach a schematic of the collection system. <input type="checkbox"/> Attached <b>Previously submitted and approved</b>	
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>	
<b>N/A</b>	

<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.): Recirculating Media Filter	
Attach a treatment schematic. <input type="checkbox"/> Attached <b>Previously submitted and approved</b>	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): <b>There are no bypass points in the system. TWSI also has emergency generators to run the pumps</b>	
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: 1.0 +/- acres Inches/week gpd/sq.ft loading rate to be applied: 2 inches/week	
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: UV+ Attractive Access drip	
<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: 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.</b> <b>Describe the following:</b>	<input checked="" type="checkbox"/> N/A
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):	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) <span style="margin-left: 150px;"><input type="checkbox"/> Public parking lot(s)</span> <input type="checkbox"/> Private industry lot(s) <span style="margin-left: 150px;"><input type="checkbox"/> Private property(ies)</span> <input type="checkbox"/> County(ies), list: <span style="margin-left: 150px;"><input type="checkbox"/> Statewide</span>		
<b>Wash equipment description:</b>		
<input type="checkbox"/> Truck mounted <span style="margin-left: 150px;"><input type="checkbox"/> Trailer mounted</span> <input type="checkbox"/> Rinse tank size(s) (gal.): <span style="margin-left: 150px;"><input type="checkbox"/> Mixed tanks size(s) (gal.):</span> <input type="checkbox"/> Collection tank size(s) (gal.): <span style="margin-left: 150px;">Number of tanks per vehicle:</span>		
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.



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

March 3, 2017

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-06035**  
**Tennessee Wastewater Systems, Inc. d/b/a Summit View Resort**  
**Summit View Resort**  
**Sevierville, Sevier County, Tennessee**

Dear Mr. Hyatt:

The Division of Water Resources (the division) has received your application for the above referenced project on 13-FEB-17. We have reviewed the application for completeness in accordance with TDEC rule 1200-4-5-.05 (2) and find the application to be incomplete. As you are aware additional information related to the recent engineering plan submittal was requested in a letter dated February 16, 2017 from Brad Harris. The processing of this application has been suspended until the information requested in the letter is received. This information includes:

A new survey showing the location all existing systems and constitute record drawings for the site.

Provide deed, easements or other agreements that authorize TWSI to use specified property for the treatment plant and land application areas currently being utilized and matching the detailed survey.

Proposed drip zones and expansion construction shall be shown on separate sheets with 5 foot or more accurate contour spacing and property boundaries accurately depicted. Drip zones shall be shown super-imposed on approved soil surveys with pit locations shown on the proposed new drip area.

Proposed construction shall be indicated with existing features screened back as in conventionally produced site drawings.

The currently proposed or modified construction plans will be reconsidered upon clarification of the accurate boundaries, existing site plan and land application areas available to TWSI.

Modifications in the construction approval and the State Operating Permit based on the new plans.

You should be aware that in accordance with TDEC Rule 1200-4-5-.05 (2), your receipt of this notice 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 Knoxville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Allen Rather at (615) 532-5819 or by E-mail at *Allen.Rather@tn.gov*.

Sincerely,



Brad Harris, P.E.  
Manager, Land Based Systems

Enclosure

cc: Permit Section File  
Knoxville Environmental Field Office  
Mr. David K. Beverly, Consulting Engineer, , copperridge303@bellsouth.net  
Mr. Jeremy Stewart, Operator, TWSI, jeramy.stewart@adenus.com  
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, michelle.ramsey@tn.gov  
Mr. Kevin Dean, Attorney, Fraantz, McConnell & Seymour LLP, kdean@fmsllp.com  
Ms. Patsy Fulton, Utility Rate Specialist, Tennessee Regulatory Authority, Patsy.Fulton@tn.gov