



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

Systems subject to Notice of Violations and other Corrective Orders:

Starr Crest II (NOV) – HOA and owners have approved of the agreement with Adenus to expand the treatment system. Agreement has been executed and construction schedule is being set with commencement expected to begin within the next few weeks.

Smoky Village (NOV) – Docket 16-00096 – Settlement Agreement with CPAD has been filed in the docket.

Summit View – Docket 14-00136 – TDEC has reinstated the construction plans for the site.

Cedar Hill – Docket 16-00096 – Settlement Agreement with CPAD has been filed in the docket.

Maple Green (NOV) – Docket 16-00096 – Settlement Agreement with CPAD has been filed in the docket.

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

Hidden Springs Resort (NOV) – Soils work is being conducted onsite to determine suitable soils for the necessary drip field expansion. Plans to overhaul the treatment facility continue to be developed. TDEC conducted a site visit last month.

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

Jeff Riden

From: HAWKMS Agent <agent@hawkms.com>
Sent: Friday, December 1, 2017 7:50 AM
To: Charles Hyatt; Brian Carter
Cc: Jeff Riden; Bob Pickney; Matt Pickney
Subject: TRA KPI Compliance Report for 12/1/2017 7:50:04 AM

TPUC Flow KPI Report for 11/30/2017

Tracy Nichols	Permitted	Expected	Actual	% of Expected	AvgFlow	% of
Cedar Hill DCP	75000	18035	70	0.00	126.67	
Maple Green DCP	74000	40273	32070	0.80	51540.65	

Jeremy Stewart	Permitted	Expected	Actual	% of Expected	AvgFlow	% of
Hidden Springs RSF	16000	19600	10623	0.54	14511.27	
Starr Crest II BC	28000	23275	23967	1.03	27389.73	
Summit View RSF	8000	5950	2000	0.34	9427.00	

Brandon Dotson	Permitted	Expected	Actual	% of Expected	AvgFlow	% of
Smoky Village RSF	5600	5075	2448	0.48	1792.60	

Marshall Fall

From: Brad Harris <Brad.Harris@tn.gov>
Sent: Thursday, November 02, 2017 3:02 PM
To: Marshall Fall
Cc: George Garden; Jeff Ridsen
Subject: RE: Structures Location Survey Summit View.pdf

Marshall,

George, Allen and I have reviewed the as-built provided. We have a few questions below:

1. Field visits from a few months ago indicated that there had been some construction activity in the second area (area not owned by Summit View residents). The as-built does not indicate any construction. Has anything been installed on the other property?
2. The as-built doesn't match the plans very well... What are the drip line footages, spacing, and basic layout (I assume it was installed on contour). Are you only dosing two zones?
3. Per the letter from February 15th, do you have a copy of the agreement, or easement that covers the treatment plant and land application areas?
4. I have been unable to reach the surveyor that is listed on the survey. His signature is not on the survey. Did he certify the survey? Did he locate the existing system components or is that something Adenus has added?

Thanks,
Brad



Department of
**Environment &
Conservation**

Brad C Harris P.E.

Division of Water Resources / William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243
Direct (615) 532-5367 / Brad.Harris@tn.gov

From: Marshall Fall [<mailto:marshall.fall@adenus.com>]
Sent: Friday, October 27, 2017 8:10 AM
To: Brad Harris
Cc: George Garden; Jeff Ridsen
Subject: Structures Location Survey Summit View.pdf

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

Brad,

Attached is a PDF that is intended to meet TDEC's request for the additional necessary information for the Summitt View Treatment Facility. This document contains three pages that show GIS locations of the existing drip zone areas and zone

components. This document also includes a topo map with 2' contours of the additional proposed drip disposal areas, overlaid onto the construction plans that Adenus submitted for approval.

I hope this is what the department needs to move forward. If you have any questions, please let me know.

Regards,

MF

Marshall Fall

From: Marshall Fall
Sent: Monday, November 06, 2017 3:27 PM
To: 'Brad Harris'
Cc: 'George Garden'; Jeff Riden
Subject: FW: Requested Summit View Documentation
Attachments: Summit View Dev. Contract.pdf; TWSI Dyson - Summit View Agreement.pdf

Is this what you were looking for?

3. "Per the letter from February 15th, do you have a copy of the agreement, or easement that covers the treatment plant and land application areas?

Thanks,

Marshall

From: Marshall Fall
Sent: Monday, May 15, 2017 7:42 AM
To: 'Brad Harris' <Brad.Harris@tn.gov>; George Garden <George.Garden@tn.gov>
Cc: Charles Hyatt <Charles.Hyatt@adenus.com>; Jeff Riden <Jeff.Riden@adenus.com>; Keith Townsend <Keith.Townsend@adenus.com>
Subject: Requested Summit View Documentation

Brad,

Attached are two agreements that Tennessee Wastewater Systems Inc. (TWS) has in place for the land/s that are involved with the existing and proposed expansion of the wastewater treatment facilities at the Summit View development in Sevier County, TN. The attached documents are meant to partially satisfy the requests made by TDEC per the expansion plans "Rescind Letter" dated February 16, 2017.

In order to fulfill the remaining requests within the "Rescind Letter", TWS has contracted a licensed surveyor to complete the boundary and topo survey. The surveyor has also been instructed to locate existing facilities and structures in reference to the boundary survey to facilitate the production of an accurate as-built. TWS has already received the boundary survey with the existing structures and is in the process of overlaying the most recent construction plans. As soon as TWS receives the topo survey, they will be added to the plans and the plans forwarded to TDEC.

If you have any questions or comments, please feel free to contact me.

Thanks,


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

Marshall Fall

From: Marshall Fall
Sent: Tuesday, November 07, 2017 11:42 AM
To: 'Brad Harris'; 'George Garden'
Cc: Jeff Ridsen; Charles Hyatt
Subject: RE: Structures Location Survey Summit View.pdf
Attachments: Summit View Hole Locations Signed.pdf; Structures Location Survey_Soils_ Plans Summit View Overlay.pdf

Importance: High

See comments in red. If you have any other questions let me know. I will send the signed contour survey as soon as I get it.

Thanks,

Marshall

From: Brad Harris [mailto:Brad.Harris@tn.gov]
Sent: Thursday, November 02, 2017 3:02 PM
To: Marshall Fall <marshall.fall@adenus.com>
Cc: George Garden <George.Garden@tn.gov>; Jeff Ridsen <Jeff.Ridsen@Adenus.com>
Subject: RE: Structures Location Survey Summit View.pdf

Marshall,

George, Allen and I have reviewed the as-built provided. We have a few questions below:

1. Field visits from a few months ago indicated that there had been some construction activity in the second area (area not owned by Summit View residents). The as-built does not indicate any construction. Has anything been installed on the other property? No construction has taken place in the lower (new) drip area.
2. The as-built doesn't match the plans very well... What are the drip line footages @37-3800 LF/Zone, spacing average of 5', and basic layout (I assume it was installed on contour) Your assumption is correct. Are you only dosing two zones ?Yes, 2 zones
3. Per the letter from February 15th, do you have a copy of the agreement, or easement that covers the treatment plant and land application areas? The agreements were attached to the email.....I resent them yesterday also.
4. I have been unable to reach the surveyor that is listed on the survey. Welcome to our world! His signature is not on the survey. Did he certify the survey? I have requested a signed copy of the latest survey. Did he the locate the existing system components Yes, see attached PDF. or is that something Adenus has added? Adenus added the areas for drip and the locations of the lines and several components. This was done by our GIS equipment that is used in the field to record line and equipment locations. There may be some error due to the terrain and vegetation/tree cover. The components that the surveyor located are shown in the attached PDF titled "Structures Location Survey_Soils_Plans Summit View Overlay". This was sent to you months ago with a full description of what it was. This is the same as the certified copy attached, just overlayed with the plans that were rescinded.

Thanks,
Brad



Department of
**Environment &
Conservation**

Brad C Harris P.E.

Division of Water Resources / William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243
Direct (615) 532-5367 / Brad.Harris@tn.gov

From: Marshall Fall [<mailto:marshall.fall@adenus.com>]
Sent: Friday, October 27, 2017 8:10 AM
To: Brad Harris
Cc: George Garden; Jeff Riden
Subject: Structures Location Survey Summit View.pdf

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

Brad,

Attached is a PDF that is intended to meet TDEC's request for the additional necessary information for the Summitt View Treatment Facility. This document contains three pages that show GIS locations of the existing drip zone areas and zone components. This document also includes a topo map with 2' contours of the additional proposed drip disposal areas, overlaid onto the construction plans that Adenus submitted for approval.

I hope this is what the department needs to move forward. If you have any questions, please let me know.

Regards,

MF

Marshall Fall

From: Brad Harris <Brad.Harris@tn.gov>
Sent: Thursday, November 09, 2017 12:33 PM
To: Marshall Fall; George Garden
Cc: Jeff Riden; Charles Hyatt; George Bell
Subject: RE: Structures Location Survey Summit View.pdf

Marshall,

I met with George and we went through the survey information. One of the purposes of the surveyor work was to establish real property lines, and the location of construction that had been underway, in order to, make sure we stayed, and built on the parcel where Adenus has property rights. Apparently, there has been no additional survey work since May by a licensed surveyor that I'm aware of. We are still uncertain if one of the drip zones is entirely on your property. The setback to the property line doesn't appear to be present on the southwest property line. Regardless, we will release the plans. I don't see any reason to continue to withhold them since Adenus has gone ahead and installed the upper portion of the system without plans. I will try to put together a more formal letter on Monday. I will coordinate with you on an inspection towards the end of the month. George said he thought you guys had located the iron pins on the southwest property line. This line needs to be staked at the time of the inspection so maybe we can verify that we are on Adenus property.

Brad



Brad C Harris P.E.

Division of Water Resources / William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243
Direct (615) 532-5367 / Brad.Harris@tn.gov

From: Marshall Fall [<mailto:marshall.fall@adenus.com>]
Sent: Tuesday, November 07, 2017 11:43 AM
To: Brad Harris; George Garden
Cc: Jeff Riden; Charles Hyatt
Subject: RE: Structures Location Survey Summit View.pdf
Importance: High

See comments in red. If you have any other questions let me know. I will send the signed contour survey as soon as I get it.

Thanks,

Marshall

From: Brad Harris [<mailto:Brad.Harris@tn.gov>]
Sent: Thursday, November 02, 2017 3:02 PM

To: Marshall Fall <marshall.fall@adenus.com>

Cc: George Garden <George.Garden@tn.gov>; Jeff Riden <Jeff.Riden@Adenus.com>

Subject: RE: Structures Location Survey Summit View.pdf

Marshall,

George, Allen and I have reviewed the as-built provided. We have a few questions below:

1. Field visits from a few months ago indicated that there had been some construction activity in the second area (area not owned by Summit View residents). The as-built does not indicate any construction. Has anything been installed on the other property? No construction has taken place in the lower (new) drip area.
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Thanks,

Brad



Brad C Harris P.E.

Division of Water Resources / William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243
Direct (615) 532-5367 / Brad.Harris@tn.gov

From: Marshall Fall [<mailto:marshall.fall@adenus.com>]

Sent: Friday, October 27, 2017 8:10 AM

To: Brad Harris

Cc: George Garden; Jeff Riden

Subject: Structures Location Survey Summit View.pdf

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I hope this is what the department needs to move forward. If you have any questions, please let me know.

Regards,

MF

Marshall Fall

From: Allen Rather <Allen.Rather@tn.gov>
Sent: Thursday, November 16, 2017 10:23 AM
To: Marshall Fall
Cc: George Garden; George Bell; Brad Harris
Subject: Re-approval of Summit View Plans
Attachments: Summit View Plans Approval.doc

Marshall,

The attached letter reinstates approval of the Summit View Plans for system modification. Please let me know if you have any questions.

Thanks,

Allen Rather, LPSS
Environmental Consultant
Land Based Systems Unit
Division of Water Resources
615-532-5819-o
615-970-0467-c

Marshall Fall

From: Brad Harris <Brad.Harris@tn.gov>
Sent: Monday, November 27, 2017 7:14 AM
To: Marshall Fall
Cc: George Garden; George Bell; Michael Caudill
Subject: Summit View

Marshall,

We would like to schedule an inspection of the Summit View construction on Wednesday the 29th at 11:30am. ET. Let me know if you or your East TN staff can be present.

Thanks,



Brad C Harris P.E.

Division of Water Resources / William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243
Direct (615) 532-5367 / Brad.Harris@tn.gov

Marshall Fall

From: Marshall Fall
Sent: Monday, November 27, 2017 7:19 AM
To: 'Brad Harris'
Cc: George Garden; George Bell; Michael Caudill
Subject: RE: Summit View

Sounds good Brad. There shouldn't be any issue with the date. Will let you know ASAP. Also, any update on the issuance of the new Logue Road permit?

Thanks,

Marshall

From: Brad Harris [mailto:Brad.Harris@tn.gov]
Sent: Monday, November 27, 2017 7:14 AM
To: Marshall Fall <marshall.fall@adenus.com>
Cc: George Garden <George.Garden@tn.gov>; George Bell <George.Bell@tn.gov>; Michael Caudill <Michael.Caudill@tn.gov>
Subject: Summit View

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312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243
Direct (615) 532-5367 / Brad.Harris@tn.gov

Marshall Fall

From: Marshall Fall
Sent: Friday, December 01, 2017 2:52 PM
To: 'George Garden'
Subject: RE: 171201_Hidden Springs Resort

George,

Just an FYI, I did not see flows/discharges from the FAST modules or the RSF. If it were present, nobody from TDEC said anything to me. I did however see water coming from the area of the slope toe below the drip fields. There was an odor present, however, as you know it is a wastewater plant, and it was only noticeable on the back side of the modules. There was some standing water but it did not look like untreated wastewater. I didn't smell anything while we were all standing onsite near the RSF.

Also, Brad may have told you that TWW is planning on submitting plans as soon as we can get them completed to start repairing the facility. We talked with Brad and George Bell about this and some potential public comment period issues that may arise while onsite. I need to call and talk to you about this and will try to the first of next week.

Rest assured,,,,I'm, WE are trying to get this cleaned up.

Have a good weekend,

Marshall

From: George Garden [mailto:George.Garden@tn.gov]
Sent: Friday, December 01, 2017 8:20 AM
To: Bob Pickney <Bob.Pickney@Adenus.com>; Charles Hyatt <Charles.Hyatt@Adenus.com>; Marshall Fall <marshall.fall@adenus.com>
Subject: FW: 171201_Hidden Springs Resort

From: George Garden
Sent: Friday, December 01, 2017 8:19 AM
To: 'ButchandPam Savage'
Cc: Brad Harris; George Bell; Jennifer Dodd; Jonathon Burr; Tisha Calabrese
Subject: 171201_Hidden Springs Resort

I appreciate the continued conversation and your interest in resolving the issues at Hidden Springs Resort.

You may rest assured that the Division has serious issues with the Hidden Springs Resort situation regardless of who said what to whom. I don't know how I would have pictures of the drip disposal field failures from Wednesday if our staff had not visited the drip field. There is no substitute for hard first-hand evidence.

The odor at the site noted by our staff is unacceptable. The lack of documentation of the improvised treatment system and the existing and planned disposal system at the site is unacceptable. Numerous surface flows/discharges from the treatment and disposal sites observed are unacceptable. We are considering our options for enforcement action and as a party directly involved will keep you informed. We will continue to take seriously our responsibility to protect public health and the environment and in order to fulfill those responsibilities we will pursue remedies at our disposal to

correct departures from those standards. We will continue to act in a transparent manner and involve permit holders in their conformance to permit requirements, environmental regulations and state and federal laws until legal requirements prevent that dialogue.



George C. Garden, P.E. BCEE | Chief Engineer
Division of Water Resources
11th Floor, William R. Snodgrass TN Tower
312 Rosa L. Parks Avenue
Nashville TN 37243-1102
p. 615-253-9934 c. 615-416-0164
george.garden@tn.gov

From: ButchandPam Savage [<mailto:butchandpamsavage@gmail.com>]

Sent: Thursday, November 30, 2017 3:59 PM

To: George Garden

Cc: Arthur G. Seymour, Jr.; Nina Hutchinson; Allan Morgan; Ed Thompson; Jerry Stahl; Nelson Wynn; Sheree Humphries

Subject: Tennessee Waste Water

Good afternoon, Mr. Garden,

I just received information from our resort manager that she was informed by Bob Pickney that the state did not find any issue with their system yesterday when they visited our resort. That is very interesting, in that according to our maintenance supervisor, who saw the state cars and a TWW vehicle come in together, they never visited the TWW drip field. We are still receiving complaints about the odor in the resort coming from the TWW drip field. We have one owner who has reported he lost over \$18,000 in rental income this year because of the odor.

I would appreciate hearing back from you. TWW may say everything is OK, but it definitely is NOT!

Thank you,

William Savage, President
Hidden Springs Resort HOA

Marshall Fall

From: Marshall Fall
Sent: Friday, December 01, 2017 1:50 PM
To: 'Brad Harris'
Cc: 'George Garden'; Charles Hyatt; Jeff Riden
Subject: New Drip area_ For Summit View Signed and sealed survey
Attachments: Topo and boundary survey_lower Drip.pdf

Brad,

Attached is the signed topo and boundary survey I promised you.

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