



851 Aviation Parkway  
Smyrna, TN 37167

Tennessee Wastewater Systems, Inc.  
Docket 15-00025  
September 2019 Report Overview

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

**Summit View** – Docket 14-00136 – TDEC has reinstated the construction plans for the site. A NOV was issued for the site on August 20<sup>th</sup>. TWSI investigated the claims in the NOV and did not find evidence of the violations as alleged in the NOV.

**River Road\*** (NOV) – TWSI is awaiting a signed easement for the land occupied by the sewer system. This is the final requirement TDEC had for resolution of the NOV.

**Hidden Springs Resort** (Commissioner's Order) – Awaiting plans approval from TDEC. An Agreed Order is being negotiated with TDEC that will put a timeframe on the completion of the expansion project. A petition will be filed with the Commission seeking approval to spend funds from TWSI's escrow and reserve accounts for this project. A NOV was issued for this site related to the ongoing issues addressed in the Commissioner's Order. TWSI addressed the concerns raised in the NOV and reasserts that the plant must be expanded to ensure proper operation.

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

**Jeff Ridsen**

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**From:** HAWKMS Agent <agent@hawkms.com>  
**Sent:** Sunday, September 1, 2019 8:12 AM  
**To:** Jeff Ridsen; Matthew Nicks  
**Cc:** Bob Pickney  
**Subject:** TPUC KPI Compliance Report for 9/1/2019 8:00:07 AM

## TPUC Flow KPI Report for 8/31/2019

Jeremy Stewart	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Hidden Springs RSF	30750	19425	8243	0.42	14821.57	
Summit View RSF	8000	5775	5680	0.98	2491.97	

Brandon Dotson	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Smoky Village RSF	5600	4725	2640	0.56	1475.60	



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

**Knoxville Environmental Field Office**

**3711 Middlebrook Pike**

**Knoxville, TN 37921**

**Phone 865-594-6035**

**Statewide 1-888-891-8332**

**Fax 865-594-6105**

**August 13, 2019**

**VIA CERTIFIED MAIL: 9489 0090 0027 6129 2754 62  
RETURN RECEIPT REQUESTED**

**Mr. Jeff Risen, VP  
Adenus Group, LLC.  
Tennessee Wastewater Systems, Inc.  
849 Aviation Parkway  
Smyrna, Tennessee 37167**

**RE: Notice of Violation  
Hidden Springs Resort  
State Operating Permit 00-068  
Sevier County**

**Dear Mr. Risen:**

On August 6, 2019, Michael Caudill, Billy Roach, and Macy Brummitt from the Tennessee Division of Water Resources conducted a complaint investigation due to the discharge of sewage from failing treatment facilities and drip fields from Hidden Springs Resort operating under State Operating Permit 00-068. Billy Roach and Macy Brummitt conducted a follow-up investigation again on August 12, 2019. Below are the findings.

**Investigation Findings**

During the investigation the day of August 6, 2019, Hidden Springs Resort's wastewater treatment plant was observed overflowing sewage from a pump station and running into drainage leading to Seaton Branch. During the August 12, 2019 follow-up investigation the sewage in the drainage leading to Seaton Branch was still observable, however the overflow from the pump station was no longer present. Also noted in this investigation the effluent is flowing on the surface of the ground in the drip field area and not assimilating into the soil profile. Based on these observations the following are violations of the effluent limits established in State Operating Permit 00-0068.

**Part II.A.4. of the State Operating Permit states:**

***The permittee shall at all times properly operate and maintain all facilities and systems (and related appurtenances) for collection and treatment which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit.***

Mr. Jeff Riden VP.  
Tennessee Wastewater Systems, Inc.  
August 9, 2019  
Page 2

**Part II.C.2.a & 3.b Reporting of Noncompliance & Overflow**

*2.a. In the case of any noncompliance which could cause a threat to public drinking supplies, or any other discharge which could constitute a threat to human health or the environment, the required notice of non-compliance shall be provided to the appropriate Division environmental field office within 24 hours from the time the permittee becomes aware of the circumstances.*

*3.b. Overflows are prohibited.*

Tennessee Wastewater Systems, Inc must respond in writing to this Notice of Violation by September 6, 2019 with a plan for correcting the violations documented in this letter. At this time, a Corrective Action Plan (CAP) must be developed and implemented to ensure compliance with current State Operating Permit 00068. The CAP should include, but not be limited to, modifications to operation and maintenance necessary to eliminate violations and a timeline in which the modifications will be put into operation.

If you have any questions concerning this investigation or if we may be of any further assistance to you in any way, please feel free to contact Michael Caudill by phone at (865) 594-5476 or by email at Michael.caudill@tn.gov.

Sincerely,



Michael Atchley  
Environmental Program Manager  
Knoxville Environmental Field Office  
Division of Water Resources

cc: Enforcement & Compliance Section, Nashville, WPC

September 4, 2019

Mr. Michael Atchley  
Tennessee Department of Environment and Conservation  
Knoxville Environmental Field Office  
3711 Middlebrook Pike  
Knoxville, TN 37921

VIA EMAIL: [Michael.Atchley@tn.gov](mailto:Michael.Atchley@tn.gov)

Re: Notice of Violation  
Hidden Springs Resort – SOP- 00-068  
Sevier County, Tennessee

Mr. Atchley:

This letter is in response to the Notice of Violation (NOV) issued to Tennessee Wastewater Systems, Inc. (TWSI) on August 20, 2019 arising from an inspection by TDEC personnel at Summit View Resort in Sevierville, TN on August 6, 2019. TWSI was not notified of the inspection as required under the terms of the SOP, nor was TWSI aware of any complaint about the operation of the system. The NOV alleges certain violations of the SOP and requests that a Correction Action Plan be submitted to address the concerns raised in the NOV.

TWSI requested documentation, including photos, videos, and field notes from the inspection so that it may better respond to the allegations in the NOV. However, at the time of filing this response, no information has been provided, so this response is based upon TWSI's own investigation of the concerns raised in the NOV.

Upon investigation, TWSI observed no sewage overflowing from the facility. The pipe identified in the NOV as the source of the overflow is the drain tile for the control building. One of the inline pumps had a loose fitting that resulted in water trickling out of the exterior drain. The pump was sealed and there is no more trickling water.

There was no effluent visibly flowing on the ground in drip zones 1 and 2. The zones were in fact relatively dry, even considering TWSI was at the site on the day of a rain event. The drip fields were inspected, and no evidence found that effluent washed out any pathways or that there had been any recent soil saturation. TWSI will continue to monitor the drip fields.

If you have any further questions or concerns, please contact Matthew Nicks at [matthew.nicks@adenus.com](mailto:matthew.nicks@adenus.com) or 615-220-7700

Regards,



Jeff Riden  
General Counsel

Cc: Allen Rather – [allen.rather@tn.gov](mailto:allen.rather@tn.gov)  
Michael Caudill – [michael.caudill@tn.gov](mailto:michael.caudill@tn.gov)  
Matthew Nicks – [matthew.nicks@adenus.com](mailto:matthew.nicks@adenus.com)  
Billy Dranes – [billy.dranes@adenus.com](mailto:billy.dranes@adenus.com)  
Marshall Fall – [marshall.fall@adenus.com](mailto:marshall.fall@adenus.com)  
Jeremy Stewart – [jeramy.stewart@adenus.com](mailto:jeramy.stewart@adenus.com)



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**August 20, 2019**

**Certified Mail: 9489 0090 0027 6129 2754 24**

**RETURN RECEIPT REQUESTED**

**Mr. Jeff Rieden, VP**

**Adarus Group, LLC.  
Tennessee Wastewater Systems, Inc.  
849 Aviation Parkway  
Smyrna, Tennessee 37167**

**RE: Notice of Violation  
Summit View Resort  
State Operating Permit 00-068  
Sevier County**

**Dear Mr. Rieden:**

On August 6, 2019, Michael Caudill, Billy Roach, and Macy Brummitt from the Tennessee Division of Water Resources conducted a complaint investigation due to the discharge of sewage from failing treatment facilities and drip fields from Summit View Resort operating under State Operating Permit 06-035. Below are the findings.

**Investigation Findings**

During the investigation the day of August 6, 2019, Summit View Resort's wastewater treatment plant was observed overflowing sewage from a pipe near the sand filter and control building. Also noted in this investigation the effluent is flowing on the surface in several locations on the ground where the new drip lines had been installed and the treated effluent was not assimilating into the soil profile. Based on these observations the following are violations of the effluent limits established in State Operating Permit 06-035.

**Part II.A.4. of the State Operating Permit states:**

***The permittee shall at all times properly operate and maintain all facilities and systems (and related appurtenances) for collection and treatment which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit.***

**Part II.C.2.a & 3.b Reporting of Noncompliance & Overflow**

Mr. Jeff Riaden VP.  
Tennessee Wastewater Systems, Inc.  
August 20, 2019  
Page 2

*2.a. In the case of any noncompliance which could cause a threat to public drinking supplies, or any other discharge which could constitute a threat to human health or the environment, the required notice of non-compliance shall be provided to the appropriate Division environmental field office within 24 hours from the time the permittee becomes aware of the circumstances.*

*3.b. Overflows are prohibited.*

Tennessee Wastewater Systems, Inc must respond in writing to this Notice of Violation by September 6, 2019 with a plan for correcting the violations documented in this letter. At this time, a Corrective Action Plan (CAP) must be developed and implemented to ensure compliance with current State Operating Permit 06-35. The CAP should include, but not be limited to, modifications to operation and maintenance necessary to eliminate violations and a timeline in which the modifications will be put into operation.

If you have any questions concerning this investigation or if we may be of any further assistance to you in any way, please feel free to contact Michael Caudill by phone at (865) 594-5476 or by email at [Michael.caudill@tn.gov](mailto:Michael.caudill@tn.gov).

Sincerely,



Michael Atchley  
Environmental Program Manager  
Knoxville Environmental Field Office  
Division of Water Resources

cc: Enforcement & Compliance Section, Nashville, WPC

September 4, 2019

Mr. Michael Atchley  
Tennessee Department of Environment and Conservation  
Knoxville Environmental Field Office  
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VIA EMAIL: [Michael.Atchley@tn.gov](mailto:Michael.Atchley@tn.gov)

Re: Notice of Violation  
Hidden Springs Resort – SOP- 00-068  
Sevier County, Tennessee

Mr. Atchley:

This letter is in response to the Notice of Violation (NOV) issued to Tennessee Wastewater Systems, Inc. (TWSI) on August 13, 2019 arising from an inspection by TDEC personnel at Hidden Springs Resort in Sevierville, TN on August 6, 2019 and a follow up visit on August 12, 2019. TWSI was not notified of either inspection as required under the terms of the SOP, nor was TWSI aware of any complaint about the operation of the system. The NOV alleges certain violations of the SOP and requests that a Correction Action Plan be submitted to address the concerns raised in the NOV.

Upon learning about the inspection and findings, TWSI personnel conducted their own investigation and found some solenoid valve wiring was damaged. The wiring was repaired and dosing to the drip fields has returned to normal function. TWSI also removed and cleaned several pumps from the discharge and recirculation tanks which has returned the system to a normal level of operation.

To correct the issues at Hidden Springs, the plant must be expanded. TWSI is presently awaiting approval of its plans to expand the Hidden Springs plant. Work will begin once TDEC approves the plans and the Tennessee Public Utility Commission approves funding.

If you have any further questions or concerns, please contact Matthew Nicks at [matthew.nicks@adenus.com](mailto:matthew.nicks@adenus.com) or 615-220-7700

Regards,



Jeff Riden  
General Counsel

Cc: Allen Rather – [allen.rather@tn.gov](mailto:allen.rather@tn.gov)  
Matthew Nicks – [matthew.nicks@adenus.com](mailto:matthew.nicks@adenus.com)  
Billy Dranes – [billy.dranes@adenus.com](mailto:billy.dranes@adenus.com)  
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Michael Caudill – [michael.caudill@tn.gov](mailto:michael.caudill@tn.gov)