



851 Aviation Parkway  
Smyrna, TN 37167

**Tennessee Wastewater Systems, Inc.  
Docket 15-00025  
May 2020 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.

**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) – TDEC has conditionally approved the plans subject to the design engineer making certain changes/modifications to the plant design and the utility agreeing to certain modifications to the draft SOP.

**Cross Plains\*** (Director's Order) – TDEC issued a Director's Order for the site. TWSI has filed an answer and appeal.

\* Neither system is not included in the KPI Report because there is no discharge from the facility.

\*\* System not included in the KPI Report as it has not been determined whether there is an actual problem with the drip field.

## Valerie Wunder

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**From:** Marshall Fall  
**Sent:** Wednesday, April 8, 2020 5:34 PM  
**To:** Jeff Riden  
**Subject:** Fwd: 200408\_Hidden Springs Plans approval

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**From:** George Garden <George.Garden@tn.gov>  
**Sent:** Wednesday, April 8, 2020 3:47:27 PM  
**To:** Marshall Fall <marshall.fall@adenus.com>  
**Subject:** RE: 200408\_Hidden Springs Plans approval

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I'm only going to apply it to the plants not built yet or for which the permit is not issued. I can't do it for the others. Since I've been here the Design Criteria has required the nitrogen calculation; theoretically your land application loading rate is already tied to it.

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**From:** Marshall Fall [mailto:marshall.fall@adenus.com]  
**Sent:** Wednesday, April 8, 2020 3:28 PM  
**To:** George Garden  
**Subject:** [EXTERNAL] Re: 200408\_Hidden Springs Plans approval

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George this could potentially create a precedent that would trigger a permit revision of every permit that utilizes land application.

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**From:** George Garden <George.Garden@tn.gov>  
**Sent:** Wednesday, April 8, 2020 3:08:42 PM  
**To:** Marshall Fall <marshall.fall@adenus.com>  
**Subject:** 200408\_Hidden Springs Plans approval

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At least nothing has changed for 2 weeks. I wouldn't ask any different questions today as I did on 3/31; I think the questions are fundamental. In the meantime, I will answer the email on Long Lane and Hidden Springs tonight the same way I did with the "conditional approval" for Long Kelly TF this afternoon: A conditional approval based on:

1. An engineering report for a treatment plant capable of achieving 23 mg/L total nitrogen effluent.

2. An addition of an influent flow meter or the ability of the controls to calculate the influent flow (from the septic tank if it is included in the treatment plant) OR
3. Addition of controls capable of calculating and recording influent flow AND recirculation ratios.
4. Agreement with a revision to the existing permit that reports TN at least once a month and monitors (report) NH<sub>3</sub>-N once a week including a sampling/analysis coincident with the TN sample. (We anticipate cutting CBOD<sub>5</sub> and TSS sampling to as rarely as the lawyers at TDEC will allow – probably once a year.) Ammonia can be done on-site with a calibrated hand-held Hach spectrophotometric meter or calibrated probe remotely.

The 23 mg/L is a concession to Tennessee's 25 year precedence. If you believe the EPA model, I would contend that the number for the WWTP effluent should be closer to 16 mg/L TN.

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**From:** Marshall Fall [mailto:marshall.fall@adenus.com]  
**Sent:** Wednesday, April 8, 2020 2:27 PM  
**To:** Josh Lindell; George Garden  
**Cc:** William Fenner  
**Subject:** [EXTERNAL] Hidden Springs Plans approval  
**Importance:** High

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Josh and George,

It has been a while since we revisited this set of plans but TWS is in a big bind right now regarding this facility and the already approved funding to fix the mess. I want to get you two together to discuss the Nitrogen concerns and how we can "rearrange" the facility to meet the future limits.

George, Can you give Josh a quick overview of your REAL concerns regarding the design and what you want to see to give you the warm and fuzzies so we can move forward. Then we can either fix the design, argue some more, or shelf it for another year.

**Marshall Fall, P.E.**

Chief Technical Officer

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**Valerie Wunder**

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**From:** HAWKMS Agent <agent@hawkms.com>  
**Sent:** Friday, May 1, 2020 8:00 AM  
**To:** Jeff Riden; Matthew Nicks  
**Cc:** Bob Pickney  
**Subject:** TPUC KPI Compliance Report for 5/1/2020 8:00:11 AM

## TPUC Flow KPI Report for 4/30/2020

Jeramy Stewart	Permitted	Expected	Actual	% of Expected	AvgFlow	% o
Hidden Springs RSF	30750	19600	0	0.00	2258.13	
Summit View RSF	8000	5775	1986	0.34	973.40	