

**IN THE TENNESSEE REGULATORY AUTHORITY
AT NASHVILLE, TENNESSEE**

IN RE:)	
)	
PETITION OF TENNESSEE)	
WASTEWATER SYSTEMS, INC.,)	DOCKET NO. 16-00139
FOR APPROVAL OF ADJUSTMENT)	
OF ITS RATES AND NEW TARIFF)	

**FIRST DISCOVERY REQUEST
OF THE CONSUMER PROTECTION AND ADVOCATE DIVISION
TO TENNESSEE WASTEWATER SYSTEMS, INC.**

To: Jeff Riden, Esq.
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This First Discovery Request is hereby served upon Tennessee Wastewater Systems, Inc. ("Company" or "TWSI"), pursuant to Rules 26, 33, 34 and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-1-2-.11. The Consumer Protection and Advocate Division of the Attorney General's Office ("Consumer Advocate") requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Protection

and Advocate Division, 315 Deaderick Street, 20th Floor, Nashville, Tennessee 37243, c/o Karen H. Stachowski, on or before 4:00 p.m. (CDT), January 27, 2017, or at such other time as may be ordered by the Hearing Officer in the adoption or approval of a procedural schedule in this TRA Docket.

PRELIMINARY MATTERS AND DEFINITIONS

These discovery requests are to be considered continuing in nature, and are to be supplemented from time to time as information is received by TWSI and any TWSI affiliate which would make a prior response inaccurate, incomplete, or incorrect.

To the extent that the data or information requested is incorporated or contained in a document, please identify the document.

Provide all responses in the format in which they are created or maintained, for example, Microsoft Word or Microsoft Excel format with all cells and formulas intact and in working order. If a document (including without limitation a financial or other spreadsheet or work paper) is not created or maintained in Microsoft Excel format, convert the document to Microsoft Excel format or provide the document in a format that enables or permits functionality like or similar to Microsoft Excel (including without limitation the functionality of working cells and formulas), or provide the software program(s) that will enable the Consumer Advocate to audit and analyze the data and information in the same manner as would be enabled or permitted if the document were provided in Microsoft Excel format.

If any objections to this discovery are raised on the basis of privilege or immunity, please include in your response a complete explanation concerning the privilege or immunity asserted. If you claim a document is privileged, identify the document and state the basis for the privilege or

immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, please state the exact legal basis for each such refusal.

The terms “you” or “your” or “Company” or “TWSI” as used herein mean Tennessee Wastewater Inc. and all employees, agents, attorneys, representatives or any other person acting or purporting to act on its behalf.

The term “affiliate” means any entity who, directly or indirectly, is in control of, is controlled by, or is under common control with the Company. For greater clarification, “control” is the ownership of twenty percent (20%) or more of the shares of stock entitled to vote for the election of directors in the case of a corporation, or twenty percent (20%) or more of the equity interest in the case of any other type of entity, or status as a director or officer of a corporation or limited liability company, or status as a partner of a partnership, or status as an owner of a sole proprietorship, or any other arrangement whereby a person has the power to choose, direct, or manage the board of directors or equivalent governing body, officers, managers, employees, proxies, or agents of another person. In addition, the term “affiliate” shall mean any entity that directly or indirectly provides management or operational services to the Company or any affiliate (as defined in the preceding sentence) of the Company, or to which the Company provides management or operational services. Further, the payment of money to the Company or receipt by the Company of money from an entity with which the Company has any relationship, other than such payment or receipt, shall include the payor or recipient of such money as an “affiliate” for purposes of this Discovery Request.

The term “person” as used herein refers to any natural person, corporation, firm, company, proprietorship, partnership, business, unincorporated association, or other business or legal entity of any sort whatsoever.

The term “communication” means any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, meetings and personal conversations, or otherwise.

The term “document” as used herein shall have the broadest possible meaning under applicable law. “Document” as used herein means any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), work paper, spreadsheet, photograph, videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, please state what disposition was made of the document and when it was made.

The term “identify” with respect to:

- (a) any natural person, means to state the full name, telephone number, and the last known address of business address of the person and that person’s relationship, whether business, commercial, professional, or personal with you;
- (b) any legal person, business entity or association, means to state the full name, telephone number, and last known address of such person or entity;
- (c) any document, means to state the type of document (e.g., letter), the title, the subject matter, the date the document bears and the date it was written; and

- (d) any oral communication, means to state the date when and the place where it was made, the identity of the person who made it, the identity of the person or persons who were present or who heard it, and the substance of it.

“Relates to” means constitutes, contains, records, discusses, summarizes, discloses, and/or refers to, in whole or in part.

“And” and “or” shall be construed conjunctively or disjunctively as necessary to make the discovery request inclusive rather than exclusive.

“Including” shall be construed to mean including but not limited to.

The singular shall include the plural, and vice-versa, where appropriate.

FIRST DISCOVERY REQUESTS

1. Please provide a complete copy of the Company’s Income Statement for the 12 months ended December 31, 2008, 2009, 2010, 2011, 2012, 2013, 2014, and 2015.

RESPONSE:

2. Please provide a complete copy of the Company’s Balance Sheet at December 31, 2008, 2009, 2010, 2011, 2012, 2013, 2014 and 2015.

RESPONSE:

3. Please provide a complete copy of the Company’s General Ledger (in electronic format) from December 31, 2007 to December 31, 2015 for Tennessee Only operations.

RESPONSE:

4. Please provide a complete copy of the Company's General Ledger (in electronic format) from December 31, 2007 to December 31, 2015 for each of the Company's affiliate operations.

RESPONSE:

5. Please provide a complete copy of the Company's current chart of accounts.

RESPONSE:

6. Please provide a complete copy all contracts between the Company and its affiliates.

RESPONSE:

7. If any contracts are unwritten between the Company and its affiliates, please provide a description of the terms and names of the parties.

RESPONSE:

8. Please provide a complete copy of all contracts between the Company and any non-affiliates that charge costs to Tennessee customers.

RESPONSE:

9. If any contracts are unwritten between the Company and any non-affiliates, please provide a description of the terms and names of the parties.

RESPONSE:

10. Please provide the monthly number of customers in each rate regulated state that the Company operates in (eg. Alabama, Georgia, Virginia, Tennessee) from January 2008 through December 2015.

RESPONSE:

11. Please provide the number of Tennessee residential customers by service area by month from January 2008 through December 2015.

RESPONSE:

12. Please provide the number of Tennessee commercial customers by service area by month from January 2008 through December 2015.

RESPONSE:

13. Please provide the number of Tennessee residential cabin customers by service area by month from January 2008 through December 2015.

RESPONSE:

14. Please provide the number of Tennessee commercial cabin customers by service area by month from January 2008 through December 2015.

RESPONSE:

15. Please provide the number of Tennessee customers by rate classification and by service area that the Company expects to add by month from January 2016 through December 2017.

RESPONSE:

16. Please copies of the following tax returns for 2013, 2014 and 2015 for both TWSI and its parent company:

- a. Tennessee Gross Receipts Tax Returns;
- b. Tennessee Franchise & Excise Tax Returns;
- c. County Property Tax Returns; and
- d. Employer's Quarterly Federal Tax Returns (Form 941).

RESPONSE:

17. Please provide a redline copy of the Company's proposed tariff showing the additions, deletions and changes from the current tariff.

RESPONSE:

18. Refer to Exhibit 1 included with the Company's testimony. The caption on this Exhibit is titled "Profit & Loss January through December 2007" and the first column is titled "Test Period (2015)". Please confirm whether this Exhibit 1 represents the Company's profit and loss for the twelve months ended December 2007 or the twelve months ended December 2015.

RESPONSE:

19. Refer to Exhibit 1 included with the Company's testimony. Please provide the source and support for the \$-81,825.00 hard number adjustment included for account 731 – Contractual Svc - Professional.

RESPONSE:

20. Refer to Exhibit 1 included with the Company's testimony. Please provide the source and support for the \$44,958.00 hard number adjustment included for account 426 – Miscellaneous Income.

RESPONSE:

21. Refer to Exhibit 2 included with the Company's testimony. Please provide the source and support for the \$206,431.18 hard number adjustment included for account 521.1 – Residential Flat Sewer.

RESPONSE:

22. Refer to Exhibit 2 included with the Company's testimony. Please provide the source and support for the \$53,042.24 hard number adjustment included for account 521.2 – Commercial Sewer.

RESPONSE:

23. Refer to Exhibit 2 included with the Company's testimony. Please provide the source and support for the \$148,243.75 hard number adjustment included for Cabin Sewer.

RESPONSE:

24. Refer to Exhibit 2 included with the Company's testimony. Please provide the source and support for the \$33,240.00 hard number adjustment included for account 775.3 – Licenses & Permits.

RESPONSE:

25. Refer to Exhibit 2 included with the Company's testimony. Please provide the source and support for the \$250,188.57 hard number adjustment included for account 720 – Materials & Supplies.

RESPONSE:

26. Refer to Exhibit 2 included with the Company's testimony. Please provide the source and support for the \$-116,163.00 hard number adjustment included for account 731 – Contractual Svc Professional.

RESPONSE:

27. Refer to Exhibit 2 included with the Company's testimony. Please provide the source and support for the \$-31,030.00 hard number adjustment included for account 770 – Bad Debt.

RESPONSE:

28. Refer to Exhibit 2 included with the Company's testimony. Please provide the source and support for the 1,988,595-square footage amount and the 0.43 rate included for Cabin Sewer.

RESPONSE:

29. Refer to Exhibit 3 included with the Company's testimony. Please provide the source and support for the "2016 Base Wages" and "Base Adjustments" included on this schedule.

RESPONSE:

30. Refer to Exhibit 3 included with the Company's testimony. Please provide the source and support for the "IRA Percent" included on this schedule.

RESPONSE:

31. Refer to Exhibit 3 included with the Company's testimony. Please provide the source and support for the "Workers Comp Rate" included on this schedule.

RESPONSE:

32. Refer to Exhibit 4 included with the Company's testimony. Please provide the source and support for the \$1,000,000 increase in the base amount for the franchise fee calculation that is included on this schedule.

RESPONSE:

33. Refer to Exhibit 5 included with the Company's testimony. Please provide the source and support for the "Monthly Interest" amounts included on this schedule.

RESPONSE:

34. Refer to Exhibit 6 included with the Company's testimony. Please provide the source and support for the "Maintenance", "B&C", "Sewer", "Escrow", and "Square Footages" hard number amounts included on this schedule.

RESPONSE:

35. Refer to “Escrow Rider” sheet included with the Company’s testimony. Please provide the source and support for the “9/30/2016 Balance” and the “8/30/2016 Customers” included on this schedule.

RESPONSE:

36. Provide the salaries, wages, and compensation for the year ended December 31, 2016 by employee and/or board member for TWSI. In your response, indicate the account number(s) charged by employee compensation and by amount.

RESPONSE:

37. Refer to attached Exhibit A-1, which is a screen shot of the Water Resources Permits Dataviewer of the Tennessee Department of Environment and Conservation (“TDEC Dataviewer”) for permit number TN0074764 for TWSI’s River Road Utility District Service Territory (CCN 97-01394). The status of the permit is shown as incomplete, and the permit’s expiration date was September 30, 2015. The TDEC Dataviewer also shows a Notice of Violation (“NOV”) with a document date of September 20, 2016, and a copy of the NOV is attached as Exhibit A-2. According to the NOV, the system is “not complete or fully operational, and is not constructed according to the engineering plans approved by the Division. The lagoon is providing biological treatment, but the system is not capable of disinfection, flow measurement or discharge.” In a letter dated October 19, 2016 (copy found in November 2016 Report Overview in TRA Docket #15-0025), TWSI states “The flows into the treatment facility are not substantial enough to warrant the full and complete build out of the system as designed. The system more than adequately addresses the treatment needs and the requirements of the flow currently entering

the treatment facility. Please answer the following and provide documentation to support your answers:

- a. Admit or deny that the system currently is not “complete and fully operational” per the TDEC approved engineering plans for this permit.
- b. What was the value of the system when it was transferred from the developer to TWSI?
 - i. How was such value determined?
 - ii. How was the value reflected in TWSI’s general ledger (e.g. contribution in aid of construction, etc.)?
 - iii. If the system was not “complete and fully operational” per the approved plans at the time of transfer, what would have been the value of the system if it had been completed and fully operational per the approved plans by TDEC?
 - iv. If the system was not “complete and fully operational” per the approved plans at the time of transfer, how much additional costs and expense will it require to complete the system per the TDEC approved engineering plans for this permit?
- c. If the system was not “complete and fully operational” per the approved plans at the time of transfer, did TWSI require funding from the developer to cover the costs and expense for completing the system per the TDEC approved engineering plans for this permit?
- d. If the system was not “complete and fully operational” per the approved plans, how does TWSI expect to cover the cost and expense of completing the system per the TDEC approved engineering plans for this permit (e.g. tap fees, etc.)?
- e. If the system was not “complete and fully operational” per the approved plans, does TWSI have a timeframe of when the system will be complete per the TDEC approved engineering plans for this permit? What is that timeframe?
- f. If the system was not “complete and fully operational” per the approved plans, what is the capacity of the system such as flow or customers?
- g. Is there excess capacity generated by the current system? If so, how much?
- h. If the system is completed and fully operational per the TDEC approved engineering plans, will TWSI expect excess capacity to be generated?
- i. Describe and provide reference to any revenue being generated by the current system.

- j. In the corrective actions taken by TWSI in response to the NOV from TDEC dated September 21, 2016, please set out in detail the following:
 - i. Each of the actions taken,
 - ii. The costs and expenses associated with each action,
 - iii. What account(s), if any, used to cover such costs/expenses, and
 - iv. Identify the journal entries, if any, in the general ledger.

RESPONSE:

38. Refer to attached Exhibit B, which is a screen shot of the TDEC Dataviewer for permit number SOP-04050 for TWSI's Bolton Area Service Territory (CCN 99-00724). The permittee is shown as the Shelby County Government, and the status is incomplete. TWSI explained in a letter to the TRA dated June 12, 2008, which is attached as Exhibit C, that an "operating permit was never applied for and the project has been abandoned." Please explain the inclusion of this service territory in TWSI's petition for a rate increase since it appears that TWSI abandoned the project in 2008. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Since the project has been abandoned, should the CCN be cancelled for TWSI?

RESPONSE:

39. Refer to attached Exhibit D, which is a screen shot of the TDEC Dataviewer for permit number SOP-00046 for TWSI's Legacy Bay Service Territory (CCN 00-00622). The status of the permit is shown as inactive, and the permit's termination date was March 30, 2006. Please answer the following:

- a. Has a system been built under CCN 00-00622?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?
 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

40. Refer to attached Exhibit E-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-03042 for Eagle Crest Resort Service Territory (CCN 01-00183). The status of the permit is shown as inactive; the permit's expiration date was February 27, 2014, and a permit termination date of December 2, 2016. The TDEC Dataviewer also shows an Administrative Inactivation/Termination Letter, and a copy of the letter is attached as Exhibit E-2. According to the letter, TDEC has not approved plans for the construction of a system, nor had a system been constructed and provided to TWSI. Explain the inclusion of this service territory in TWSI's petition for a rate increase. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and/or expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Has this project been abandoned?

- c. Should the CCN be cancelled for TWSI?

RESPONSE:

41. Refer to attached Exhibit F, which is a screen shot of the TDEC Dataviewer for permit number SOP-01010 for Topside Business Park Service Territory (CCN 01-00220). The status of the permit is shown as inactive, and the permit's termination date was May 31, 2006. TWSI explained in a letter to the TRA dated June 12, 2008, which is attached as Exhibit C, that the "Topside Investment Group Project was cancelled." Please explain the inclusion of this service territory in TWSI's petition for a rate increase since it appears that TWSI cancelled the project in 2008. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and/or expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Since the project has been cancelled, should the CCN be cancelled for TWSI?

RESPONSE:

42. Refer to attached Exhibit G, which is a screen shot of the TDEC Dataviewer for permit number SOP-01030 for TWSI's Dollywood Project Service Territory (CCN 01-00424). The status of the permit is shown as inactive, and the permit's termination date of August 31, 2006. Please answer the following:

- a. Has a system been built under CCN 01-00424?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.

- i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - 1. Provide documentation to support these costs and expenses.
 - 2. What account(s), if any, were used to cover such costs and expenses?
 - 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

43. Refer to attached Exhibit H, which is a screen shot of the TDEC Dataviewer for permit number SOP-02006 for TWSI's Gnatty Branch Retreat Service Territory (CCN 02-00055). The status of the permit is shown as inactive, and the permit's termination date of May 31, 2007.

Please answer the following:

- a. Has a system been built under CCN 02-00055?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - 1. Provide documentation to support these costs and expenses.
 - 2. What account(s), if any, were used to cover such costs and expenses?
 - 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

44. Refer to attached Exhibit I, which is a screen shot of the TDEC Dataviewer for permit number SOP-02030 for TWSI's Airbase Road Condominiums Service Territory (CCN 02-00478). The status of the permit is shown as inactive, and the permit's termination date was March 2, 2004. Please answer the following:

- a. Has a system been built under CCN 02-00478?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?
 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

45. Refer to attached Exhibit J, which is a screen shot of the TDEC Dataviewer for permit number SOP-02019 for TWSI's Lighthouse Point Condominiums Service Territory (CCN 02-00732). The status of the permit is shown as inactive, and the permit's termination date was June 30, 2007. Please answer the following:

- a. Has a system been built under CCN 02-00732?

- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - 1. Provide documentation to support these costs and expenses.
 - 2. What account(s), if any, were used to cover such costs and expenses?
 - 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

46. Refer to attached Exhibit K, which is a screen shot of the TDEC Dataviewer for permit number SOP-03023 for Weigel's Convenience Store Service Territory (CCN 03-00519). The status of the permit is shown as inactive, and the permit's termination date was September 30, 2004. TWSI explained in a letter to the TRA dated June 12, 2008, which is attached as Exhibit C, that the "Weigel's Permit was cancelled and the project has been abandoned." Please explain the inclusion of this service territory in TWSI's petition for a rate increase since it appears that TWSI cancelled the project in 2008. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Since the project has been abandoned, should the CCN be cancelled for TWSI?

RESPONSE:

47. Refer to attached Exhibit L, which is a screen shot of the TDEC Dataviewer for permit number SOP-03047 for TWSI's Walnut Grove Service Territory (CCN 02-00732). The status of the permit is shown as inactive, and the permit's termination date was October 31, 2007. Please answer the following:

- a. Has a system been built under CCN 02-00732?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?
 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

48. Refer to attached Exhibit M, which is a screen shot of the TDEC Dataviewer for permit number SOP-04024 for TWSI's Spring Creek Ranch Service Territory (CCN 04-00123). The status of the permit is shown as inactive, and there is no effective date of a permit. Please answer the following:

- a. Has a system been built under CCN 04-00123?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.

- i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - 1. Provide documentation to support these costs and expenses.
 - 2. What account(s), if any, were used to cover such costs and expenses?
 - 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

49. Refer to attached Exhibit N, which is a screen shot of the TDEC Dataviewer for permit number SOP-00032 for TWSI's Arbor Crest Service Territory (CCN 04-00171). The permittee is shown as Metro Nashville and Davidson County, and the status is reissuance. Please explain the inclusion of this service territory in TWSI's petition for a rate increase since it appears that permit and project is with a local government. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Since the project has been abandoned, should the CCN be cancelled for TWSI?

RESPONSE:

50. Refer to attached Exhibit O, which is a screen shot of the TDEC Dataviewer for permit number SOP-04034 for TWSI's Merrill Taylor Service Territory (CCN 04-00274). The status of

the permit is shown as inactive, and there is no effective date of a permit. Please answer the following:

- a. Has a system been built under CCN 04-00274?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?
 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

51. Refer to attached Exhibit P, which is a screen shot of the TDEC Dataviewer for permit number SOP-005011 for TWSI's Marvin Keys RV Park Service Territory (CCN 05-00071). The status of the permit is shown as inactive, and the permit's termination date was December 31, 2007. Please answer the following:

- a. Has a system been built under CCN 05-00071?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?

3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- ii. Has this project been abandoned?
- iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

52. Refer to attached Exhibit Q, which is a screen shot of the TDEC Dataviewer for permit number SOP-05026 for Steve Jones Subdivision Service Territory (CCN 05-00116). The status of the permit is shown as inactive, and there is no effective date of the permit. TWSI explained in a letter to the TRA dated June 19, 2007, which is attached as Exhibit R, the Steve Jones Subdivision project was “on hold”. The status of the permit is shown as inactive and there is no effective date of a permit. Please answer the following:

- a. Has a system been built under CCN 05-00116?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI’s petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?
 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

53. Refer to attached Exhibit S, which is a screen shot of the TDEC Dataviewer for permit number SOP-05076 for Keene's Island Service Territory (CCN 06-00021). The status of the permit is shown as inactive, and there is no effective date of the permit. TWSI explained in a letter to the TRA dated June 19, 2007, which is attached as Exhibit R, the Keene Island project was "pending". The status of the permit is shown as inactive and there is no effective date of a permit. Please answer the following:

- a. Has a system been built under CCN 06-00021?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?
 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

54. Refer to attached Exhibit T-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-06017 for Parrott's Bay Service Territory (CCN 06-00077). The status of the permit is shown as inactive, and the permit termination date was December 31, 2008. TWSI explained in a letter to the TRA dated June 19, 2007, which is attached as Exhibit R, the Parrott's Bay project was "pending". TDEC sent a letter dated January 6, 2009 giving notice of the termination of

permit SOP06017 (attached as Exhibit T-2). Additionally, the TRA issued an order granting the cancellation of CCN in Docket 06-00077 (attached as Exhibit T-3). Since the permit has been terminated and the CCN cancelled, please explain the inclusion of this service territory in TWSI's petition for a rate increase. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.

RESPONSE:

55. Refer to attached Exhibit U, which is a screen shot of the TDEC Dataviewer for permit number SOP-06045 for TWSI's Richland Service Territory (CCN 06-00179). The status of the permit is shown as inactive, and the permit's termination date was June 30, 2009. Please answer the following:

- a. Has a system been built under CCN 06-00179?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?
 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

56. Refer to attached Exhibit V-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-02014 for TWSI's East Montgomery Service Territory (CCN 06-00184). The status of the permit is shown as inactive, and the permit's termination date was May 31, 2007. Additionally on a visit by TDEC in 2014, personnel noted that "no construction had begun" in its documentation of the site visit (attached as Exhibit V-2). Please answer the following:

- a. Has a system been built under CCN 06-00184?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - 1. Provide documentation to support these costs and expenses.
 - 2. What account(s), if any, were used to cover such costs and expenses?
 - 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

57. Refer to attached Exhibit W, which is a screen shot of the TDEC Dataviewer for permit number SOP-06052 for TWSI's Providence Hills Service Territory (CCN 06-00198). The status of the permit is shown as inactive, and the permit's termination date was March 1, 2013. Please answer the following:

- a. Has a system been built under CCN 06-00198?
- b. If a system has not been built, explain the inclusion of this service territory in TWSI's petition for a rate increase.
 - i. Are there costs and expenses related to this service territory that support the request for a rate increase?
 1. Provide documentation to support these costs and expenses.
 2. What account(s), if any, were used to cover such costs and expenses?
 3. Identify the journal entries, if any, in the general ledger for these costs and expenses.
 - ii. Has this project been abandoned?
 - iii. Should the CCN be cancelled for TWSI?
- c. If a system has been built, explain the inactive status of the permit and provide a copy of a current collection system map indicating the existing customer base.

RESPONSE:

58. Refer to attached Exhibit X-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-07010 for Sharondel Estates Service Territory (CCN 06-00204). The status of the permit is shown as inactive, and the permit termination date was January 27, 2013. TDEC sent a letter dated January 31, 2013 giving notice of the termination of permit SOP07010 (attached as Exhibit X-2). TWSI explained in a letter to TDEC dated January 17, 2013 that the permits should be terminated since the facility has not been constructed nor would it (attached as Exhibit X-3). Since the permit has been terminated, please explain the inclusion of this service territory in TWSI's petition for a rate increase. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.

- b. Since the project has been abandoned, should the CCN be cancelled for TWSI?

RESPONSE:

59. Refer to attached Exhibit Y-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-07063 for Smokey Mountain Service Territory (CCN 07-00235). The status of the permit is shown as inactive, and the permit termination date was August 31, 2012. TDEC sent a letter dated September 6, 2012 giving notice of the termination of permit SOP07063 (attached as Exhibit Y-2). Since the permit has been terminated, please explain the inclusion of this service territory in TWSI's petition for a rate increase. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Since the permit was terminated, should the CCN be cancelled for TWSI?

RESPONSE:

60. Refer to attached Exhibit Z-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-008011 for Milky Way Farms Service Territory (CCN 08-00029). The status of the permit is shown as inactive and the permit termination date was September 30, 2103. TDEC sent a letter dated January 22, 2014 giving notice of the termination of permit SOP08011 (attached as Exhibit Z-2) since TWSI indicated that the facility had not been constructed nor would be. Since the permit has been terminated, please explain the inclusion of this service territory in TWSI's petition for a rate increase. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Since the permit was terminated, should the CCN be cancelled for TWSI?

RESPONSE:

61. Refer to attached Exhibit AA-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-07092 for Saddle Ridge Service Territory (CCN 08-00209). The status of the permit is shown as inactive; the permit's expiration date was February 30, 2013; and a permit termination date of December 2, 2016. The TDEC Dataviewer also shows an Administrative Inactivation/Termination Letter, and a copy of the letter is attached as Exhibit AA-2. According to the letter, TDEC has not approved plans for the construction of a system, nor had a system been constructed and provided to TWSI. Explain the inclusion of this service territory in TWSI's petition for a rate increase. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and/or expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Has this project been abandoned?
- c. Should the CCN be cancelled for TWSI?

RESPONSE:

62. Refer to attached Exhibit BB-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-08056 for Scenic River Service Territory (CCN 09-00006). The status of the permit is shown as inactive; the permit's expiration date was November 30, 2013; and a permit termination date of December 2, 2016. The TDEC Dataviewer also shows an Administrative Inactivation/Termination Letter, and a copy of the letter is attached as Exhibit BB-2. According to the letter, TDEC has not approved plans for the construction of a system, nor had a system been constructed and provided to TWSI. Explain the inclusion of this service territory in TWSI's petition for a rate increase. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and/or expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Has this project been abandoned?
- c. Should the CCN be cancelled for TWSI?

RESPONSE:

63. Refer to attached Exhibit CC-1, which is a screen shot of the TDEC Dataviewer for permit number SOP-08006 for Preserve at Eagle Rock Service Territory (CCN 09-00007). The status of the permit is shown as inactive; permit expiration date was November 1, 2014, and the permit termination date was August 1, 2014. TDEC sent a letter dated August 7, 2014 giving notice of the termination of permit SOP08006 (attached as Exhibit CC-2). TWSI explained in electronic mail to TDEC dated April 24, 2014 that it would not renew the permit (attached as Exhibit CC-3). Since the permit has been terminated, please explain the inclusion of this service territory in TWSI's petition for a rate increase. Please answer the following:

- a. Are there costs and expenses related to this service territory that support the request for a rate increase?
 - i. Provide documentation to support these costs and expenses.
 - ii. What account(s), if any, were used to cover such costs and expenses?
 - iii. Identify the journal entries, if any, in the general ledger for these costs and expenses.
- b. Since the permit was terminated, should the CCN be cancelled for TWSI?

RESPONSE:

64. In TWSI's petition for this docket, Ussery #1 Service Area is listed under residential territories associated with "TRA Docket #00-00198" and under the commercial territories associated with "TRA Docket #06-00259". What is the TDEC permit number(s) for TRA Dockets 00-00198 and 06-00259?

RESPONSE:

65. In TWSI's petition for this docket, Hidden Springs Resort Service Area is listed under cabin territories associated with "TRA Docket #00-00379". However, in the last rate case (Docket #08-00202), there was a service area called Hidden Springs under commercial territories associated with "TRA Docket #06-00259". Please answer the following:

- a. Is Hidden Springs (Docket #06-00259) the same system as Hidden Springs Resort (Docket #00-00379)?
- b. Why is Hidden Springs associated with Docket #06-00259 not listed as a service area in the current petition for this docket?

RESPONSE:

66. In TWSI's petition for this docket, Eagle Crest Resort Service Area is listed under cabin territories associated with "TRA Docket #01-00183". However, in the last rate case (Docket #08-00202), Eagle Crest Resort was listed under residential territories associated with "TRA Docket #01-00183" and commercial territories associated with "TRA Docket # 06-00259". Why is Eagle Crest Resort associated with Docket #06-00259 not listed as a service area in the current petition for this docket?

RESPONSE:

67. In TWSI's petition for this docket, Starr Crest II Service Area is listed under cabin territories associated with "TRA Docket #01-00755". However, in the last rate case (Docket #08-00202), Starr Crest II was listed under residential territories associated with "TRA Docket #01-00755" and commercial territories associated with "TRA Docket # 06-00259". Why is Starr Crest II associated with Docket #06-00259 not listed as a service area in the current petition for this docket?

RESPONSE:

68. In the last rate case (Docket #08-00202), Eagle Crest II was listed under residential territories associated with "TRA Docket #01-01128". Why is Eagle Crest II associated with Docket #01-01128 not listed in any service area in the current petition for this docket?

RESPONSE:

69. In TWSI's petition for this docket, Highlands Service Area is listed under cabin territories associated with "TRA Docket #02-00781". However, in the last rate case (Docket #08-00202),

Highlands Service Area was listed under residential territories associated with “TRA Docket #02-00781” and commercial territories associated with “TRA Docket # 06-00259”. Why is Highlands associated with Docket #06-00259 not listed as a service area in the current petition for this docket?

RESPONSE:

70. In TWSI’s petition for this docket, Falling Waters Service Area is listed under cabin territories associated with “TRA Docket #02-00782”. However, in the last rate case (Docket #08-00202), Falling Waters Service Area was listed under residential territories associated with “TRA Docket #02-00782” and commercial territories associated with “TRA Docket # 06-00259”. Why is Falling Waters associated with Docket #06-00259 not listed as a service area in the current petition for this docket?

RESPONSE:

71. In TWSI’s petition for this docket, Black Bear Service Area is listed under cabin territories associated with “TRA Docket #03-00192”. However, in the last rate case (Docket #08-00202), Black Bear Service Area was listed under residential territories associated with “TRA Docket #03-00192” and commercial territories associated with “TRA Docket # 06-00259”. Why is Black Bear Service Area associated with Docket #06-00259 not listed as a service area in the petition for this docket?

RESPONSE:

72. In TWSI’s petition for this docket, Smoky Cove Service Area is listed under cabin territories associated with “TRA Docket #03-00377”. However, in the last rate case (Docket #08-

00202), Smoky Cove Service Area was listed under residential territories associated with “TRA Docket #03-00377” and commercial territories associated with “TRA Docket # 06-00259”. Why is Smoky Cove Service Area associated with Docket #06-00259 not listed as a service area in the current petition for this docket?

RESPONSE:

73. Please provide the TDEC permit number(s) for the following listed in the current petition:

- a. Trailhead Service Area associated with TRA Docket #04-00045.
- b. Timber Tops Rental Center Service Area associated with TRA Docket #04-00045.
- c. Black Bear Expansion Service Area associated with TRA Docket #04-00045.
- d. Legacy Laurel Branch Service Area associated with TRA Docket #04-00045.
- e. Legacy Mountain Service Area associated with TRA Docket #04-00045.
- f. Legacy the Preserve Service Area associated with TRA Docket #04-00045.
- g. Starr Crest II Phase 4 Service Area associated with TRA Docket #04-00045.
- h. Shreibman Development Service Area associated with TRA Docket #98-00880.
- i. East Stewart Service Area with TRA Docket 01-00183.
- j. Eagle Springs Subdivision Service Area with TRA Docket #01-00445.
- k. Goose Creek Service Area with TRA Docket #02-00172.
- l. Sevier County Service Area with TRA Docket #03-00045.
- m. Williamson County West Service Area with TRA Docket #04-00394.
- n. Emerald Pointe Service Area with TRA Docket #04-00200.
- o. Tarpley Shop Utility District Service Area with TRA Docket #08-00161.

RESPONSE:

74. In a letter from TRA to TWSI dated May 23, 2008 attached as Exhibit DD, three TDEC permits are associated with TRA Docket #00-01128. In TWSI's petition for this docket, City of Coopertown Service Area is listed under residential service areas and associated with "TRA Docket #11-001128". However under commercial service areas listing, Docket #00-01128 is listed under the name of Coopertown Service Area. Please answer the following:

- a. Is City of Coopertown and Coopertown Service Areas (Docket #00-01128) the same system under the residential and commercial listings?
- b. What other TDEC permits are associated with Docket 00-01128 beyond the three listed in the May 23, 2008 letter?

RESPONSE:

75. Please identify each person who you expect to call as an expert witness at the hearing on the merits in this docket, and for each such expert witness:

- (a) Identify the field in which the witness is to be offered as an expert;
- (b) Provide complete background information, including the witness's current employer, as well as his or her educational, professional and employment history, and qualifications within the field in which the witness is expected to testify;
- (c) Identify all publications written or presentations presented in whole or in part by the witness, including either a copy of all such publications and presentations or a reference to where such publications and presentations may be publicly obtained;
- (d) Provide the grounds for the opinions to which the witness is expected to testify, and provide a summary of the grounds for each such opinion;
- (e) Identify any matter in which the expert has testified (through deposition or otherwise) by specifying the name, docket number and forum of each case, the dates of the prior testimony and the subject of the prior testimony, and identify the transcripts of any such testimony;
- (f) Identify the terms of the retention or engagement of each expert including but not limited to the terms of any retention or engagement letters or agreements relating to his/her engagement, testimony, and opinions as well as the compensation to be paid for the testimony and opinions;

- (g) Identify any exhibits to be used as a summary of or support for the testimony or opinions provided by the expert; and
- (h) Please produce copies of all documents, summaries, charts, trade articles, journals, treatises, publications, work papers, file notes, chart notes, tests, test results, interview notes, and consultation notes provided to, reviewed by, utilized by, relied upon, created by, or produced by any proposed expert witness in evaluating, reaching conclusions or formulating an opinion in this matter.

RESPONSE:

76. Please identify all persons having knowledge of discoverable matters in this case.

RESPONSE:

77. Please produce copies of all documents referred to or relied upon in responding to these discovery requests.

RESPONSE:

78. Please produce copies of all hearing exhibits that you plan to introduce, use, or reference at the hearing on the merits in this docket.

RESPONSE:


79. Please produce copies of all documents -- including, without limitation, work papers, spreadsheets, summaries, charts, notes, exhibits, articles, journals, treatises, periodicals, publications, reports, records, statements, Internet web pages, or financial information -- relied upon by any of your witnesses in evaluating, reaching conclusions, or formulating an opinion in this matter.

RESPONSE:

80. Identify all information, documents and things filed in the present docket record, including all responses to discovery of the parties and data request from the TRA Staff, which TWSI produced in this docket and does not agree to stipulate to the authenticity of such information, documents and things in this proceeding. For each separate piece of information, documents and things which TWSI produced in this docket and TWSI contends is not admissible as evidence describe in specific detail any objection(s) TWSI claims as to admissibility into the evidentiary record in this docket.

RESPONSE:

RESPECTFULLY SUBMITTED,


KAREN H. STACHOWSKI
(BPR No. 019607)
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Protection and Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
(615) 741-8733

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

Jeff Riden, Esq.
General Counsel
Tennessee Wastewater Systems, Inc.
851 Aviation Parkway
Smyrna, TN 37167
615-220-7171
615-346-9516 (fax)
Jeff.riden@adenus.com

Henry M. Walker, Esq.
Bradley, LLP
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615-252-2363
615-252-6363 (fax)
hwalker@bradley.com

This the 13 day of January, 2017.



KAREN H. STACHOWSKI

EXHIBIT A

EXHIBIT
A-1



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE ENVIRONMENTAL FIELD OFFICE
711 R. S. GASS BOULEVARD
NASHVILLE, TENNESSEE 37243
PHONE (615) 687-7000 STATEWIDE 1-888-891-8332 FAX (615) 687-7078**

September 20, 2016

**Certified Mail: 7014 2870 0001 3597 0411
Return Receipt Requested**

Mr. Charles Hyatt, CEO
Tennessee Wastewater Systems, Inc.
Adenus Group, LLC
849 Aviation Parkway
Smyrna, TN 37167

Re: Notice of Violation
Compliance Evaluation Inspection
Tennessee Wastewater Systems – River Road / Lost Hollow Subdivision Lagoon
NPDES Permit # TN0074764, Cheatham County

Dear Mr. Hyatt:

I would like to thank you and Brian Carter for meeting with George Garden, Michael Murphy, Zachary Coppa and me on November 2, 2015, to conduct a Compliance Evaluation Inspection of the Tennessee Wastewater Systems' River Road / Lost Hollow Subdivision Wastewater Treatment Lagoon.

Mr. Carter was contacted by telephone on January 14, 2016, to obtain any updates to system status. He stated there had been no changes at the facility since the date of the inspection.

The following are key points of the inspection. Details of the findings of the inspection are contained in the attached inspection report.

Permit

1. The most recent NPDES permit expired on September 30, 2015. An application for renewal was received by the Division on March 24, 2015, but was found to be incomplete. A notice of incomplete application was sent by letter dated April 9, 2015, and additional information was required. To date, the required information has not been provided to the Division.
2. The prior NPDES permit was issued to Tennessee Wastewater Systems, Inc., which is a corporation owned by Adenus Group, LLC. However, the facility is located on property owned by Lost Hollow Limited Partnership.

Site Review

The system is not complete or fully operational, and is not constructed according to the engineering plans approved by the Division. The lagoon is providing biological treatment, but the system is not capable of disinfection, flow measurement or discharge.

1. The control building has not been constructed and there is no power supply available. There is no means of flow measurement. The approved engineering plans for this project included those items.



2. The chlorine contact chamber and control valves are not surrounded by fencing. The Division's Design Criteria for Sewage Works (Chapter 1, General Engineering Requirements, 1.3.5 Specifications) states that a fence is to surround all wastewater treatment systems. The approved engineering plans included fencing around all structures.
4. Portions of the discharge line are laid over the surface of the ground, and one pipe joint is disconnected between the valves and the contact chamber. The discharge line at the outfall point had been covered over with rip-rap, which has filled in with soil and vegetation. The exact location or condition of the pipe outlet could not be verified (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance).
5. The facility identification sign on the lagoon fence stated "Treated Domestic Wastewater", "On-Site Systems", gave an outdated phone contact number, and did not contain the current Division name. This does not meet the permit requirements or the Division's Design Criteria for Sewage Works, (Chapter 1, General Engineering Requirements, 1.3.5 Specifications). The term "treated domestic wastewater" is only appropriate to describe final effluent after disinfection.
6. The single outfall sign identified the discharge point as "Treated Domestic Wastewater Drip Irrigated Plots", did not contain the permit number or the appropriate wording required in the permit, and did not contain the current Division name (Part III, Other Requirements, B. Placement of Signs). The location should be identified as "Treated Domestic Wastewater Discharge".

Operation & Maintenance

1. Tennessee Wastewater Systems has a contract with Adenus Operations, LLC to provide a certified operator and to operate the wastewater treatment system.
2. The area inside the lagoon fence had been bush hogged recently, but vegetation had not been cleared down to the area along the water line. Heavy woody vegetation, high weeds, and tree saplings remained in that area. The woody vegetation and trees in the area surrounding the outlet standpipe and walkway structure had been partially cleared. We were advised that the trees were recently treated with herbicide to prevent re-growth. Adequate vegetation management has not been provided to maintain the integrity of the structure and to allow access and inspection during site visits or the compliance inspection. Keeping the embankments clear of heavy vegetation is necessary to allow routine inspection of the structure for damage due to borrowing animals or for leakage (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance).
3. The indentations and holes in one of the lagoon embankments appeared to be larger than during the previous compliance inspection. The embankment was too overgrown to adequately inspect for structural integrity or animal burrows (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance).
4. Despite filling with floodwaters in 2010, the lagoon has dropped back to the pre-flood water level. There have been no reported discharges from the system since lagoon construction in 2001. Wastewater levels have not been monitored to measure changes.
5. The chlorine contact chambers were overgrown with woody vegetation and trees and could not be adequately inspected (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance).

Records & Reports

1. Copies of the iPhone monthly site visit forms for the previous year were reviewed. The time of the facility site visits were not documented. The forms noted that the facility was fenced, but all

structures are not yet enclosed with fencing. No observations were documented of the wastewater level in the lagoon to monitor for water loss, leakage, or increasing levels.

2. The most recent certified operator form provided to the Division, signed September 3, 2015, lists Tracy Nichols as the certified operator in direct responsible charge for this facility. However, Mr. Carter's name has remained on the monthly operation reports (MORs) as the certified operator in charge and Larry Barnes is listed as the person conducting the monthly site visits on those forms. Mr. Carter's signature on the MORs is not original. For Mr. Nichols to serve as the operator in charge, he must directly supervise the work activities of Mr. Barnes and provide an original signature on the MORs.

Collection System

1. Information obtained during previous inspections had indicated that only four residential customers were connected to the system. On May 9, 2016, you provided a requested list of customers which included five locations. As stated in previous inspection letters (2001, 2003, 2008, 2015), no additional customers were to be connected to the system without advising the Division and obtaining prior approval, or completing the facility project and making all portions of the system functional. The permits states that the "permittee may not add wasteloads to the existing system without the knowledge and approval of the Division" (Part III, Other Requirements, C. Addition of Wasteloads). A review of Division records found that prior approval was given for only a total of two connections.
2. If it is not already available, an up to date collection system map must be developed, and amended to include all additions or changes to the system that are made in the future.

Conclusion

Some of the violations and compliance items cited in the previous inspection, Notice of Violation dated February 19, 2015, had not been corrected. The system is not complete and operational. The lagoon and structures present are not properly maintained to retain operational function, or to allow necessary routine inspection. The system should be completed, and maintained in operational condition. Prior inspections conducted in 2001, 2003, and 2008, also noted these items.

Not providing proper maintenance of the wastewater system, not meeting the conditions of the NPDES permit, and not providing reports signed by the certified operator in charge are violations of the NPDES permit and of the *Tennessee Water Quality Control Act*. Failure to complete system construction in accordance with approved engineering plans and specifications is also a violation of the *Act*.

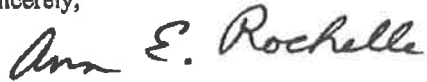
Please provide a written response within 30 days of receipt of this letter stating what actions have been or will be taken to correct the violations and items listed in this inspection letter and report. The corrective action plan (CAP) should include specific corrective measures and dates of completion or a scheduled completion date for each item. The response should also include the following.

- An engineering evaluation of the structural integrity of the lagoon, the lagoon outlet structure, piping and chlorine contact chamber
- An up to date map of the collection system, an electronic copy of a GIS program map may be used

Mr. Charles Hyatt
September 20, 2016
Page 4

Again, I would like to thank you and Mr. Carter for your assistance during the inspection. If you have any questions or need additional information, please contact me at 615-687-7123, or e-mail at Ann.Rochelle@tn.gov.

Sincerely,



Ann E. Rochelle, Environmental Consultant
Division of Water Resources
Nashville Environmental Field Office

Enclosure

Cc: Brian Carter, Adenus Operations
Robert J. Pickney, Registered Agent, Lost Hollow Limited Partnership

Compliance Evaluation Inspection Report
Tennessee Wastewater Systems – River Road / Lost Hollow Subdivision Lagoon
NPDES Permit # TN0074764, Cheatham County

On November 2, 2015, George Garden, Michael Murphy, Zachary Coppa and I met with CEO Charles Hyatt and Brian Carter to conduct a Compliance Evaluation Inspection at the Tennessee Wastewater Systems' River Road / Lost Hollow Subdivision Wastewater Treatment Lagoon.

Mr. Carter was contacted by telephone on January 14, 2016. He stated there had been no changes at the facility since the date of the inspection.

The following is a report of the findings of that inspection.

Permit

1. The most recent NPDES permit became effective on November 1, 2010, and expired on September 30, 2015. An application for renewal was received by the Division on March 24, 2015, but was found to be incomplete. A letter from the Division, dated April 9, 2015, (copy attached) advised Chief Technical Officer Roy Denney that the application process had to be suspended until additional information was provided. To date, that information has not been provided to the Division.
2. The prior NPDES permit was issued to Tennessee Wastewater Systems, Inc., which is a corporation owned by Adenus Group, LLC. However, the facility is located on property owned by Lost Hollow Limited Partnership.

Site Review

1. The system was designed to consist of residential septic tanks with effluent filters, and a low pressure pipe system carrying flow to an anaerobic lagoon, followed by disinfection by chlorination. Permitted discharge is to the Cumberland River.
2. The control building has not been constructed and there is no power supply available. There is no means of flow measurement. The approved engineering plans for this project included these items. Some type of flow measurement device must be installed to meet the permit requirement for reporting of instantaneous flow readings. There is no means to measure the wastewater level in the lagoon so that fill or loss rates can be monitored.
3. The lagoon itself has a perimeter fence with a locked gate. The control valves for discharge and the chlorine contact chamber are located outside the lagoon fence. New posts were being placed to install a gate to keep livestock out of the area of the contact chambers. This will still not provide fencing to completely enclose the structure. The Division's Design Criteria for Sewage Works (Chapter 1, General Engineering Requirements, 1.3.5 Specifications) states that a fence is to surround all wastewater treatment plants (including lagoon systems). A complete enclosure fence around the control valves and the contact chambers should be installed that will both exclude livestock and prevent public access for purposes of safety and security of the system.
4. A system identification sign was posted on the fence but provided the name and phone number for the previous permit holder, On-Site Systems, and did not have the current Division name. It also stated "Treated Domestic Wastewater". That terminology should only be used for the treated final effluent after disinfection (at the outfall point) and not the wastewater in the lagoon. The lagoon should be identified as a wastewater treatment system (Division Design Criteria for Sewage Works, Chapter 1, General Engineering Requirements, 1.3.5 Specifications). An updated sign should be posted that provides the current identification and contact information.
5. A single sign, facing the river, was attached to a tree on the river bank near the outfall point. The wording on the sign identified the system as "Treated Domestic Wastewater Drip Irrigated Plots" and did not contain the permit number or appropriate wording to meet the requirements of the NPDES permit (Part III, Other Requirements, B. Placement of Signs), and did not contain the current Division

name. A double faced sign containing the correct wording to identify the discharge and provide contact information must be placed where it is visible from both the water and the land.

Operation & Maintenance

1. Tennessee Wastewater Systems has a contract whereby Adenus Operations, LLC provides a certified operator and operates the wastewater treatment system. Mr. Carter is Operations Manager for Adenus. Lawrence (Larry) Barnes was listed with the Division as the operator in charge for this facility until September 2015. The most recent certified operator form provided to the Division, signed September 3, 2015, lists Tracy Nichols as the certified operator in direct responsible charge for this facility. Mr. Barnes has continued to conduct the monthly site visits as indicated on the site visit forms. If Mr. Barnes conducts the site visits, then in order for Mr. Nichols to serve as the certified operator in direct responsible charge, he must directly supervise Mr. Barnes' work activities at the system.
2. The area inside the lagoon fence had been bush hogged recently, and vegetation on the lagoon banks was cleared down to the area along the water line. There was still heavy woody vegetation, high weeds, and tree saplings in the remaining area. Some of the tree samplings had been cut around the lagoon outfall structure and the walkway was now accessible. There was still dense woody growth and small tree samplings surrounding and under the walkway around the outfall standpipe. This prevented access and close inspection of the standpipe structure and effluent piping. This area should be completely cleared the heavy vegetation to allow inspection during each site visit (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance).
3. We were advised that the trees were recently treated with herbicide to prevent re-growth. The remaining areas need to be cleared and kept cleared to prevent deep rooted woody vegetation from penetrating the lagoon embankments and causing damage or structural instability of the treatment unit. Keeping the embankments clear of heavy vegetation is necessary to allow routine inspection of the structure for damage due to borrowing animals or for leakage (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance).
4. During this inspection and during the last inspection, areas of the lagoon embankment on the side adjacent to the river were observed to have indentations and holes in the bank at water level. The indentations or holes appeared to be larger than observed in the previous inspection. These areas in particular should be cleared and checked to determine if there are animal burrows or areas of structural instability (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance). Placement of fluorescent dye along this bank and at these locations could be helpful in determining if there is any leakage.
5. There have been no discharges reported from the system since it began operation in 2001. The wastewater level appears to be at close to the same level as observed in past inspections. There is currently no means to monitor the wastewater level, and no observations of the levels are included in the site visit forms. Some means should be provided to use for measuring the wastewater levels during the site visits.
6. The effluent line leading from the discharge valves to the chlorine contact chambers was visible, laying on the surface of the ground. A section of the PVC pipe was disconnected prior to reaching the contact chambers (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance). The discharge valves are kept closed. The PVC valves have no protective structure around them and have become partially buried in the leaf litter and vegetation. The valve structures and connected piping should be cleared of any accumulated material or vegetation and should be protected against damage (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance). The valves should be checked during each inspection and this noted on the site visit forms.
7. As noted in the previous inspection, the area surrounding the below ground contact chambers was overgrown with deep rooted woody vegetation, trees and weeds. This obscured the structures and prevented close inspection to determine the condition of the treatment units. This deep rooted growth

can damage the structures and interfere with operation of those treatment units in the future. The area surrounding the structures should be cleared and vegetation kept under control. Before being put into service, these structures, the valves and piping will have to be tested to determine there is no damage and that all are still in good working order (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance).

8. The outfall pipe could not be observed. You advised us that the discharge pipe was above the current water level in the river (Cheatham Reservoir), but was covered with rip rap. The area was found to be covered over with small size rip rap, soil, and encroaching vegetation. Because of these conditions, it could not be determined exactly where the pipe outlet is located, whether the pipe might be blocked by this material or whether a discharge could actually occur through the pipe (NPDES Permit Part II., A. General Provisions, 4. Proper Operation & Maintenance). The outfall area should be kept clear of vegetation to prevent root damage to the outfall line and to allow routine inspection during site visits. The path should be maintained open to allow access.

Records & Reports

1. Electronic site visit forms are completed by Adenus Operations personnel using an iPhone program which sends the information to be saved on a central computer system where it can be printed out later. Where system information is stored electronically, suitable backup and electronic safeguards should be provided to prevent loss of data. The NPDES permit requires that all records be maintained on file for a minimum of three years, with the exception of sludge disposal records.
2. Copies of the monthly site visit forms for the previous year were requested, and were provided in electronic form following the inspection. The following review items need to be addressed:
 - The date of the inspections is documented on the forms, but the time is not included. The time should be added to the forms and documented.
 - The item "treatment facility fenced" should not be indicated as "yes" until a fence surrounding the control valves and chlorine contact chambers is completed.
 - An item should be added for documenting the wastewater level in the lagoon, or the information can be included in the comments area of the form. It is essential to monitor water levels to detect loss or leakage and later to determine when discharge will be necessary.
3. Records must be maintained of the septic tank inspections as part of the system maintenance records. Records must also be maintained whenever solids are removed from the tanks, including the disposal method and location of disposal. The permit requires that the sludge disposal records be maintained for a period of five years.
4. The MOR/DMR forms are prepared monthly and submitted monthly as required by the permit. The date and time of the monthly site inspections are not recorded on the MOR/DMR forms. This information must be included.
5. Mr. Carter's signature is given on the MOR/DMR forms as certified operator. The signature appears to be copied on all the reports. Although Mr. Carter is a certified operator, the certified wastewater treatment system operator in direct responsible charge for this facility, Mr. Nichols, must sign these reports. The designated operator in charge can be changed at any time, but the Division's Compliance & Enforcement Section must be advised in writing of that change. Original report forms and signatures are required for any self-monitoring reports submitted to the Division.

Collection System

1. The customers own the septic tanks located at each residence, and are responsible for any repairs due to leakage. The utility is responsible for maintaining the tanks, filters, and collection system lines.
2. The tanks are checked every three years by using a sludge judge, and the utility is responsible for pumping and disposing of the solids as needed.
3. Information obtained during previous inspections had indicated that only four residential customers were connected to the system. On May 9, 2016, you provided a requested list of customers which included five locations. As stated in previous inspection letters, no additional customers were to be

connected to the system without advising the Division and obtaining prior approval, or completing the facility project and making all portions of the system functional. A review of Division records found that prior approval was given for only a total of two connections.

4. As stated in previous inspection letters (2001, 2003, 2008, 2015), no additional customers are to be connected to the system without advising the Division in advance and obtaining prior approval, or completing the facility project and making all portions of the system functional. The permits states that the "permittee may not add wasteloads to the existing system without the knowledge and approval of the Division" (Part III, Other Requirements, C. Addition of Wasteloads).
5. If it is not already available, an up to date collection system map must be developed, and amended to include all additions or changes to the system that are made in the future.

Conclusion

The system is not complete and operational at this time. The lagoon is serving as a storage area for the wastewater where biological treatment is occurring, but it is not capable of disinfection or discharge through the permitted outfall point. The lagoon was filled and flood waters reached a point several feet above the top of the embankments during the 2010 flood. However, the lagoon did not retain the flood waters and went back down to the current water level, below the level of the designed discharge outlet pipe. The long term overgrowth of deep rooted woody vegetation and trees, and/or animal burrows may have compromised the structural integrity of the lagoon, chlorine contact chambers and piping. The entire system should be cleared of the woody vegetation, and the lagoon, piping and contact chamber tested for leakage. The system should then be completed per approved engineering plans and maintained in a condition capable of proper operation and discharge.

Inspection Report by Ann Rochelle



TDEC - Division of Water Resources
Nashville Field Office

ICIS NPDES Facilities Inspection Report

Facility Data			
NPDES ID:	TN0076764	Facility Site Name:	Tennessee Wastewater Systems - River Road / Lost Hollow Subdivision Lagoon
		Address:	3211 River Road, Ashland City, TN 37015
Permit Eff. Date:	Nov 1, 2010	Permit Exp Date:	Sep 30, 2015
		SIC Code:	

Compliance Monitoring Information	
Compliance Monitoring Activity Name:	Compliance Evaluation (non-sampling) (CEI)
* If Bio Monitoring is selected above, select the method used:	
Compliance Monitoring Activity:	Follow-Up

Compliance Monitoring Dates/Times	
Entry Date/Time (mm/dd/yyyy hh:mm):	11/02/2015 12:30
Exit Date/Time (mm/dd/yyyy hh:mm):	11/02/2015 04:00

Facility Representatives	
Brian Carter, Operations Mgr., Adenus Operations, 615-220-7100	Charles Hyatt, CEO, TN. Wastewater Systems/Adenus Group LLC, 615-220-7162
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information	
Federal Statute:	CWA - Clean Water Act
State Statute:	Tennessee Water Quality Control Act
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)

Compliance Monitoring Reason:	Core Program		
Compliance Monitoring Agency Type:	State	Agency Name:	TDEC - DWR
Did EPA assist/ Inspection?	No	Time Physically conducting activity: Days:	1
		Hours:	
Inspection Type:	State	Compliance Monitoring Action Outcome:	Under Review
Lead Agency:	State	Compliance Monitoring Rating Code:	Unrated
If Joint Inspection, what was the purpose of the other party?			

Areas Evaluated During Inspection (Check only those areas evaluated)		
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary
The system is not complete and operational. The control building has not been constructed, flow measurement is not installed, and power is not available. Disinfection, flow measurement & discharge cannot be provided. The lagoon & chlorine contact chambers have not been kept cleared of deep rooted woody vegetation, structures & piping have not been properly maintained, indentations or holes in the lagoon embankment need to be evaluated for structural soundness. Identification signs are inaccurate & out of date. The certified operator in direct responsible charge is not signing the reports.

EPA and State Representatives		
Ann E. Rochelle	TDEC, Div. of Water Resources, NEFO 615-687-7123	1/14/16
Inspector's Signature	Agency / Office / Phone	Date
Michael P. Murphy	TDEC, Div. of Water Resources, NEFO 615-687-7000	5-10-16
Manager's Signature	Agency / Office / Phone	Date

EXHIBIT B



Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas We

Site ID	Parent Site	Location	City	County	GIS
12141	Shelby County Government - Bolton Estates Subdivision	Bolton Estates Subdivision	Arlington	Shelby	View Map

Permit Information

[Help](#) [Back to Previous Page](#)

Permit Number SOP-04050

Permittee Name Shelby County Government - Bolton Estates Subdivision

Permit Type SOP

Status Incomplete

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 02-JUN-2014

Application Complete 01-JUN-2009

Application Returned 25-JUN-2014

Public Notice

Issuance Date 30-NOV-2009

Effective Date 01-JAN-2010

Expiration Date 29-NOV-2014

Modification Date

Termination Date

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description STEP/STEG tanks, collection system recirculating sand filter, fenced drip irrigation and UV disinfection

Treatment Description STEP/STEG tanks, collection system recirculating sand filter, fenced drip irrigation and UV disinfection

Flow Rate [MGD] .007

Record Last Updated 08-MAR-2016

EXHIBIT

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EXHIBIT C



Docket
02-00497

851 Avlation Parkway
Smyrna, TN 37167

2008 JUN 13 PM 4:24

June 12, 2008

T.R.A. Docket Room

RECEIVED

JUN 13 2008

TN REGULATORY AUTHORITY
UTILITIES DIVISION

Mrs. Darlene Standley, Chief
Utilities Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Tennessee Department of Environment and Conservation permits

Dear Mrs. Standley:

Tennessee Wastewater Systems, Inc. provides the following permit information per your request dated May 23, 2008 as modified by an E-mail from Michelle Ramsey dated May 30th, 2008.

We have enclosed the state operating permits for Oakwood Subdivision, Swan Harbor Subdivision, and South Ridge Estates. The permit for Watkins Creek (SOP98041) is Titled Lewis Gardens Subdivision (a former name for that subdivision). We have enclosed permits for Abington Ridge (97-01393) (Which is also known as Millview Treatment Facility), Arno Page (now known as Stag's Leap), Saddle Springs, River Road, Tall Oaks Subdivision, Windsor Pointe and Cornerstone at Mitchell Creek. Bolton Area - Shelby County (99-00724) - an operating permit was never applied for and the project has been abandoned.

Additional permits enclosed are for Harbor Pointe, Townsend Town Square, Hidden Springs Resort, Starr Crest Resort.

In the Coopertown service area we have Maple Green Treatment facility((SOP01028), and Pebble Brook Treatment Facility (SOP-01029). Those permits are enclosed. The Watts Road Permit has been eliminated and the facility was never built.

We have enclosed permits for Eagle Crest Resort and Eagle Crest Resorts. The Topside Investment Group Project was cancelled.

We have enclosed permits for Jackson Bend, Dyers Hollow (Stewart County East), Hoffman Subdivision (Blue Water Bay), Herndon's Bluegrass Market, Browning Subdivision, Starr Crest II Resorts, K&J Market, and Horseshoe Bend Condominiums, Stewart County West (Cindy's Restaurant) is regulated by Ground Water Protection and there is no operating permit.

We have also enclosed permits for Falling Waters, Black Bear Ridge Resort, Black Bear Ridge Resort#2, Boswell Road(Tims Ford), Fanning Bend Treatment facility (Tims Ford), Cedar Hill Baptist Church, Sunnybrook Farms, Legacy Mountain East, Legacy Preserve#1 Resort, Timber Tops Rental, Smokey Cove Subdivision, King Branch Road, and King's Bluff Cabins.

The Weigels permit was cancelled and the project has been abandoned.

615.220.7202

www.tennessee wastewater.com

Fax:

EXHIBIT

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851 Aviation Parkway
Smyrna, TN 37167

We have enclosed permits for Paris Landing, Turner's Landing Subdivision, DeShea Creek (Marion Womack).

The Merill Taylor Subdivision (Louisville) permit (SOP04034) has been applied for but has not been received.

The Marvin Keys permit (SOP05011) has been cancelled and the project has been abandoned.

We have enclosed permits for the Clarkrange Treatment Facility (Fentress Area), the Highlands (Fentress Area), Muddy Branch Reclamation Facility (East Montgomery), Shady Gove, Norton Creek- Hickory Gap STP, and Smokey Mountain Reflections R.V. Park.

If you have any further questions, or need any additional information, please feel free to contact me.

Sincerely,

Charles Pickney, Jr.
President

EXHIBIT D

Tennessee Division of Water Resources (DWR)

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Site ID	Parent Site	Location	City	County	GIS
1833	On-Site Systems, Inc.-Legacy Bay Subdivision	Legacy Bay Subdivision	Concord	Hawkins	View Map

Permit Information

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Permit Number SOP-00046

Permittee Name On-Site Systems, Inc.-Legacy Bay Subdivision

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification

Discharge Code

Application Received 27-JUL-2000

Application Complete

Application Returned

Public Notice 18-MAR-2002

Issuance Date 30-MAR-2001

Effective Date 01-MAY-2001

Expiration Date 30-MAR-2006

Modification Date

Termination Date 30-MAR-2006

Receiving Stream unnamed tributary of Cherokee Lake

Effluent Description No discharge allowed

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Treatment Description Drip Irrigation

Flow Rate [MGD]

Record Last Updated 08-MAR-2016

Permit Documents

There are no electronic
Please contact our staff

Inspections

no data found

EXHIBIT

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EXHIBIT E

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Pulse Connect Secure Suggested Sites

Tennessee Division of Water Resources (DWWR)

Permits aDocuments Exceptional TN Wetters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
11439	Tennessee Wastewater Systems, Inc. - Eagle Crest Resed For	Upper Middle Creek Road 3 miles east of Oakwood	Near Pigeon Forge	Sevier	View Map

Permit Information

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Permit Number SOP-03042

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 15-AUG-2008

Application Complete 22-AUG-2008

Application Returned

Public Notice

Issuance Date 27-FEB-2009

Effective Date 01-APR-2009

Expiration Date 27-FEB-2014

Modification Date

Termination Date 02-DEC-2016

Receiving Stream N/A

Effluent Description No discharge allowed

SIC Code

Activity Description STEP/STEG collection system, recirculating including filter and 4.7 acre fenced drip irrigation

Treatment Description STEP/STEG collection system, recirculating including filter and 4.7 acre fenced drip irrigation

Flow Rate (MGD) .024

Record Last Updated 02-MAY-2016

Permit Documents

View	File Type	Description
	Letter	SOP-03042_Eagle Crest_Administrative_Inactivation_Termination_Final_Letter
	Report	RCVD VIA EMAIL 13-MAR-15: report re: inspection frequency database from Brian Carter
	Notice of Violation	SOP-03042 Eagle Crest Report_Late_Application_NOV
	Inspection Report	TWS Inspections/Eagle Crest Resort
	Letter	RCVD 30-MAY-12: letter to Hari Akunur re: change Official Contact from Mike Hines to Cha

Inspections

no data found





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

November 2, 2016

Mr. Charles R. Hyatt
CEO
Adenus Group, LLC
e-copy: Charles.Hyatt@adenus.com
849 Aviation Parkway
Smyrna, TN 37167

Subject: **Administrative Inactivation of State Operating Permit No. SOP-03042**
Tennessee Wastewater Systems, Inc.
Eagle Crest Resort
Near Pigeon Forge, Sevier County, Tennessee

Dear Mr. Hyatt:

This letter is to inform you the Division of Water Resources (the division) is administratively inactivating the file record the above referenced permit for the following reasons:

- The above referenced SOP expired on 27-FEB-14. The division mailed a warning letter on 22-JUL-14, regarding the application deadline for a permit renewal. To date we have not received this application from your company;
- The division never received evidence of ownership of the treatment facility land application site(s) and/or a copy of the perpetual easement(s) as required by the permit; and
- The division has not approved plans and specifications for construction of a sewage treatment system;
- A sewerage treatment system has neither been constructed nor provided to your utility for use in providing utility service.

This administrative inactivation of the file record will become effective from 30days from the date of this letter. If you have questions, please contact the Knoxville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at Hari.Akunuri@tn.gov.

Sincerely,

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

Enclosure

cc: Permit File
Knoxville Environmental Field Office
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, michelle.ramsey@tn.gov



EXHIBIT F

Tennessee Division of Water Resources (DWR)

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Site ID	Parent Site	Location	City	County	GIS
1913	On-Site Systems, Inc.-Topside Business Park	Topside Business Park	Louisville	Blount	View Map

Permit Information

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Permit Number SOP-01010

Permittee Name On-Site Systems, Inc.-Topside Business Park

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification

Discharge Code

Application Received 08-JAN-2002

Application Complete

Application Returned

Public Notice 28-JAN-2002

Issuance Date 31-MAY-2001

Effective Date 01-JUL-2001

Expiration Date 31-MAY-2006

Modification Date

Termination Date 31-MAY-2006

Receiving Stream unnamed tributary to Lackey Creek

Effluent Description No discharge

SIC Code

Activity Description Septic tank, recirculating sand filter and drip irrigation

Treatment Description Drip Irrigation

Flow Rate [MGD]

Record Last Updated 08-MAR-2016

Permit Documents

There are no electronic documents available for publi
Please contact our staff at Water.Permits@tn.gov for

Inspections

no data found

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EXHIBIT G

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas W

Site ID	Parent Site	Location	City	County
1933	On-Site Systems, Inc.-Dreamcatcher Ridge Subdivision	Dreamcatcher Ridge Subdivision	Pigeon Forge	Sevier

Permit Information

Help

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Permit Number SOP-01030

Permittee Name On-Site Systems, Inc.-Dreamcatcher Ridge Subdivision

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 03-JUL-2001

Application Complete

Application Returned

Public Notice 18-MAR-2002

Issuance Date 31-AUG-2001

Effective Date 01-OCT-2001

Expiration Date 31-AUG-2006

Modification Date

Termination Date 31-AUG-2006

Receiving Stream adjacent to an unnamed tributary of Middle Creek (500' to unnamed tributary; 600' to Middle Creek)

Effluent Description No discharge allowed

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Treatment Description Drip irrigation

Flow Rate [MGD]

Record Last Updated 08-MAR-2016

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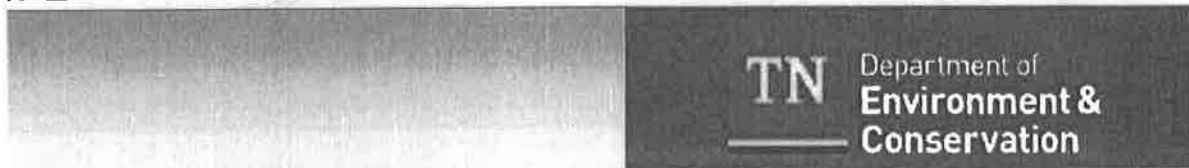
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Tennessee Division of Water Resources (DWR)

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Site ID	Parent Site	Location	City	County	GIS
1951	On-Site Systems, Inc.-Gnatty Branch Retreat	Gnatty Branch Retreat, Sevier County	-	Sevier	View Map

Permit Information

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Permit Number SOP-02006
Permittee Name On-Site Systems, Inc.-Gnatty Branch Retreat
Permit Type SOP
Status Inactive
Permit Rating
Facility Classification M
Discharge Code DI
Application Received 06-NOV-2002
Application Complete
Application Returned
Public Notice 11-NOV-2002
Issuance Date 31-MAY-2002
Effective Date 01-JUL-2002
Expiration Date 31-MAY-2007
Modification Date
Termination Date 31-MAY-2007
Receiving Stream Gnatty Branch West Prong Little Pigeon River
Effluent Description No discharge allowed
SIC Code
Activity Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation
Treatment Description Drip Irrigation
Flow Rate [MGD]
Record Last Updated 08-MAR-2016

Permit Documents

There are no electronic documents.
Please contact our staff.

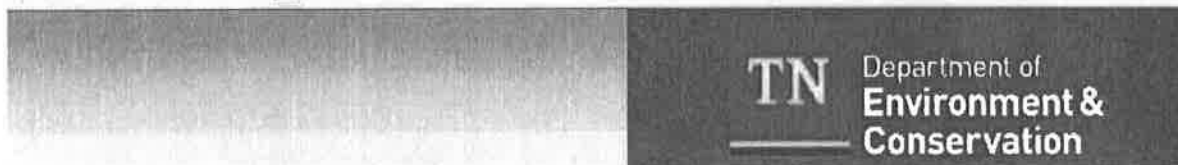
Inspections

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Tennessee Division of Water Resources (DWR)

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Site ID	Parent Site	Location	City	County	GIS
1975	On-Site Systems, Inc.-Airbase Road Condominiums	Airbase Road	Louisville	Blount	View Map

Permit Information

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Permit Number SOP-02030

Permittee Name On-Site Systems, Inc.-Airbase Road Condominiums

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI ..

Application Received 21-MAY-2002

Application Complete

Application Returned

Public Notice 12-JAN-2004

Issuance Date 30-SEP-2002

Effective Date 01-NOV-2002

Expiration Date 30-SEP-2007

Modification Date

Termination Date 02-MAR-2004

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description Septic tanks, collection system, recirculating trickling filter and drip irrigation

Treatment Description Septic tanks, collection system, recirculating trickling filter and drip irrigation

Flow Rate [MGD]

Record Last Updated 08-MAR-2016

Permit Documents

There are no electronic documents.
Please contact our staff at W:

Inspections

no data found

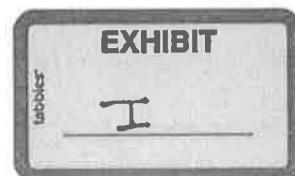


EXHIBIT J

Tennessee Division of Water Resources (DWR)

[Permits](#) [eDocuments](#) [Exceptional TN Waters](#) [Permit Appeals](#) [Complaints](#) [Inspections](#) [Oil and Gas Well](#)

Site ID	Parent Site	Location	City	County	GIS
1964	On-Site Systems, Inc.-Lighthouse Point Condominiums	RT 139, Jefferson County	-	Jefferson	View Map

Permit Information

[Help](#)

[Back to Previous Page](#)

Permit Number SOP-02019

Permittee Name On-Site Systems, Inc.-Lighthouse Point Condominiums

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification

Discharge Code

Application Received 22-APR-2002

Application Complete

Application Returned

Public Notice 13-JAN-2003

Issuance Date 28-JUN-2002

Effective Date 01-AUG-2002

Expiration Date 30-JUN-2007

Modification Date

Termination Date 30-JUN-2007

Receiving Stream Douglas Lake

Effluent Description No discharge allowed from this system

SIC Code

Activity Description Septic tanks, effluent collection system, AdvanTex recirculating sand filter and drip irrigation

Treatment Description Drip irrigation

Flow Rate [MGD]

Record Last Updated 08-MAR-2016

Permit Document

There are no documents available for this permit.
Please contact the permit holder for more information.

Inspections

no data found

EXHIBIT

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J

EXHIBIT K

TN Department of
 Environment &
 Conservation

Tennessee Division of Water Resources (DWR)

Permits Documents Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
2022	On-Site Systems, Inc.-Weigel's @ Gallaher Road Northeast of I-40 near Kingston	Gallaher Road, Northeast of I-40	Kingston	Roane	View Map

Permit Information

[Help](#) [Back to Previous Page](#)

Permit Number SOP-03023

Permittee Name On-Site Systems, Inc.-Weigel's @ Gallaher Road Northeast of I-40 near Kingston

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 29-MAY-2003

Application Complete

Application Returned

Public Notice 09-AUG-2004

Issuance Date 05-AUG-2003

Effective Date 01-SEP-2003

Expiration Date 31-JUL-2008

Modification Date

Termination Date 30-SEP-2004

Receiving Stream N/A

Effluent Description No discharge allowed

SIC Code

Activity Description Septic tank, recirculating packed bed filtration system with drip irrigation is now replaced by pump and haul permit SOP-04013 issued directly to Weigel's at Gallaher Road.

Treatment Description Septic tank, recirculating packed bed filtration system with drip irrigation is now replaced by pump and haul permit SOP-04013 issued directly to Weigel's at Gallaher Road.

Flow Rate (MGD) .0005

Record Last Updated 06-MAR-2016

EXHIBIT

K

EXHIBIT L

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Well

Site ID	Parent Site	Location	City	County	GIS
11459	Tennessee Wastewater Systems, Inc./Walnut Grove-Giles Treatment Facility	Highway 64	Pulaski	Giles	View Map

Permit Information

[Help](#) [Back to Previous Page](#)

Permit Number SOP-03047

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 30-OCT-2003

Application Complete

Application Returned

Public Notice 10-SEP-2007

Issuance Date 31-MAR-2004

Effective Date 01-MAY-2004

Expiration Date 31-MAR-2009

Modification Date

Termination Date 31-OCT-2007

Receiving Stream N/A

Effluent Description No discharge allowed

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation will not be constructed

Treatment Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Flow Rate [MGD] .02

Record Last Updated 05-OCT-2016

EXHIBIT

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EXHIBIT M

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wel

Site ID	Parent Site	Location	City	County
11870	Tennessee Wastewater, Inc. - Spring Creek Ranch Subdivision	Spring Creek Ranch Subdivision	Memphis	Shelby

Permit Information

Help

Back to Previous Page

Permit Number SOP-04024

Permittee Name Tennessee Wastewater, Inc. - Spring Creek Ranch Subdivision

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 28-APR-2004

Application Complete

Application Returned

Public Notice 23-AUG-2004

Issuance Date

Effective Date

Expiration Date

Modification Date

Termination Date

Receiving Stream N/A

Effluent Description No discharge allowed

SIC Code

Activity Description Septic tanks, collection system, recirculating sand filter and drip irrigation

Treatment Description Septic tanks, collection system, recirculating sand filter and drip irrigation

Flow Rate [MGD]

Record Last Updated 08-MAR-2016

Permit Documents

There are no electronic documents.
Please contact our staff at Water Resources for more information.

Inspections

no data found

EXHIBIT

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M

EXHIBIT N

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas We

Site ID	Parent Site	Location	City	County
1871	Metropolitan Government of Nashville and Davidson County - Arbor Crest	Arbor Pointe Way	Nashville	Davidson

Permit Information

[Help](#) [Back to Previous Page](#)

Permit Number SOP-00032

Permittee Name Metro Nashville and Davidson County - Arbor Crest

Permit Type SOP

Status Reissuance

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 22-MAR-2012

Application Complete 30-AUG-2012

Application Returned

Public Notice 10-SEP-2012

Issuance Date 01-NOV-2012

Effective Date 01-DEC-2012

Expiration Date 31-OCT-2017

Modification Date

Termination Date

Receiving Stream N/A

Effluent Description No discharge allowed

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Treatment Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Flow Rate [MGD] .0231

Record Last Updated 03-DEC-2015

Permit Documents

View	File Type
	Form
	Letter
	Permit
	Application

Inspections

Date	
MAR-23-2009	Con

EXHIBIT

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EXHIBIT O

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wa

Site ID	Parent Site	Location	City	County	GIS
12018	Tennessee Wastewater Systems, Inc. - Merrill Taylor Subdivision	3303 Turtle Cove Road	Louisville	Blount	View Map

Permit Information

[Help](#) [Back to Previous Page](#)

Permit Number SOP-04034

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 29-OCT-2004

Application Complete

Application Returned

Public Notice 07-NOV-2005

Issuance Date

Effective Date

Expiration Date

Modification Date

Termination Date

Receiving Stream N/A

Effluent Description No discharge allowed

SIC Code

Activity Description STEP/STEG collection system, recirculating trickling filter and drip irrigation

Treatment Description STEP/STEG collection system, recirculating trickling filter and drip irrigation

Flow Rate [MGD] .00045

Record Last Updated 05-OCT-2016

Permit Documents

There are no electronic documents.

Please contact our staff at Wa

Inspections

no data found

EXHIBIT



EXHIBIT P

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TN Department of
**Environment &
 Conservation**

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
12565	Tennessee Wastewater Systems, Inc. - Marvin Keys RV Park	US-25E, 6 miles North of Newport	Newport	Cocke	View Map

Permit Information

[Home](#) [Back to Previous Page](#)

Permit Number SOP-05011

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 28-JAN-2005

Application Complete

Application Returned

Public Notice 19-NOV-2007

Issuance Date 30-NOV-2005

Effective Date 01-JAN-2006

Expiration Date 30-NOV-2010

Modification Date

Termination Date 31-DEC-2007

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description STEP/STEG collection system, AdvanTex recirculating packed bed filter thence to drip irrigation and UV disinfection. The system was never built and now City of Newport municipal sewers are available.

Treatment Description STEP/STEG collection system, AdvanTex recirculating packed bed filter thence to drip irrigation and UV disinfection.

Flow Rate (MGD) 0018

Record Last Updated 05-OCT-2016



EXHIBIT Q



Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas W

Site ID	Parent Site	Location
12699	Tennessee Wastewater Systems, Inc. - Steve Jones Subdivision	Hickory Valley Road off Rt 33 approximately 10 mi north o

Permit Information

Help

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Permit Number SOP-05026

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 29-MAR-2005

Application Complete

Application Returned

Public Notice

Issuance Date

Effective Date

Expiration Date

Modification Date

Termination Date

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description STEP/STEG collection system discharging to recirculating bed filter, UV disinfection and drip irrigation

Treatment Description STEP/STEG collection system discharging to recirculating bed filter, UV disinfection and drip irrigation

Flow Rate [MGD] .0018

Record Last Updated 05-OCT-2016

EXHIBIT

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EXHIBIT R



RECEIVED

849 Aviation Parkway
Smyrna, TN 37167

2007 AUG 21 PM 3:23

JUN 21 2007

T.R.A. DOCKET ROOM
TENNESSEE REGULATORY AUTHORITY
UTILITIES DIVISION

June 19, 2007

Mrs. Darlene Standley, Chief
Utilities Division
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Tennessee Department of Environment and Conservation ("TDEC") Permits.

Dear Mrs. Standley:

In response to your letter of June 7, 2007, Tennessee Wastewater Systems, Inc. provides the following information:

Blue Sky Bay	Docket No. 07-00024	Pending
Emerald Pointe	Docket No. 05-00204	Pending
Fentress Area- Highlands	Docket No. 05-00162	Pending
Fentress Area- Clarkrange	Docket No. 05-00162	Pending
Parrott's Bay	Docket No. 06-00077	Pending
Highway 50 Subway	Docket No. 05-00077	Project cancelled
Keene's Island	Docket No. 06-00021	Pending
Majestic Mountain Resort	Docket No. 05-00070	Project Cancelled
Mountain Folks Community	Docket No. 06-00276	Pending
Happy Creek	Docket No. 06-00104	(see attached)
Piney Bay	Docket No. 06-00275	Pending
Providence Hills	Docket No. 06-00198	(see attached)
Richland Creek	Docket No. 06-00179	(see attached)
Settlers Ridge	Docket No. 06-00081	(see attached)
Smoky Village Subdivision	Docket No. 05-00145	(see attached)
Steve Jones Subdivision	Docket No. 05-00116	Project on hold
Tennessee State Wears Valley	Docket No. 05-00042	Project cancelled
Villages at Norris Lake	Docket No. 06-00277	Pending
Sharondel	Docket No. 06-00204	Pending

Sincerely,

Charles Pickney, Jr.
President

EXHIBIT S

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Well

Site ID	Parent Site	Location	City	County
18101	Tennessee Wastewater Systems, Inc. - Keene's Island Condominiums	Dandridge, Tennessee	Dandridge	Sevier

Permit Information

Help Back to Previous Page

Permit Number SOP-05076

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 04-JAN-2006

Application Complete

Application Returned

Public Notice

Issuance Date

Effective Date

Expiration Date

Modification Date

Termination Date

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Treatment Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Flow Rate [MGD] .0015

Record Last Updated 05-OCT-2016

Permit Documents

There are no electronic documents.
Please contact our staff for more information.

Inspections

no data found

EXHIBIT

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EXHIBIT T

TN Department of
Environment &
Conservation

Tennessee Division of Water Resources (DWR)

[Permits](#) [eDocuments](#) [Exceptional TN Waters](#) [Permit Appeals](#) [Complaints](#) [Inspections](#) [Oil and Gas Wells](#)

Site ID	Parent Site	Location	City	County	GIS
20191	The Peninsula	1631 Emerald Pointe Blvd: Douglas Lake off Parrotts Chapel Road in the Shady Grove Area	Dandridge	Jefferson	View Map

Permit Information

[Help](#) [Back to Previous Page](#)

Permit Number SOP-06017

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 24-MAR-2006

Application Complete 07-NOV-2006

Application Returned

Public Notice 03-NOV-2008

Issuance Date 29-DEC-2006

Effective Date 01-FEB-2007

Expiration Date 29-DEC-2011

Modification Date

Termination Date 31-DEC-2008

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter, ultraviolet disinfection and drip irrigation. This system was never built.

Treatment Description Septic tanks, effluent collection system, recirculating sand filter, ultraviolet disinfection and drip irrigation

Flow Rate [MGD] .016

Record Last Updated 05-OCT-2016

EXHIBIT

T-1

Docket
06- 00077



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

January 6, 2009

RECEIVED
2009 JAN 21 1 14 PM
T.R.A. L. L. L. ROOM

Mr. Michael Hines, M.S., P.E.
Vice President
Tennessee Wastewater Systems, Inc.
1920 Breezy Ridge Trail
Concord, TN 37922

RECEIVED

JAN 13 2009

Re: Termination of State Operating Permit No. SOP-06017
TN Wastewater Systems - Parrott's Bay Subdivision
Jefferson County

TN REGULATORY AUTHORITY
UTILITIES DIVISION

Dear Mr. Hines:

This letter is to inform you the Division of Water Pollution Control (the division) is terminating the above referenced permit effective the date of this letter.

If you have questions, please contact the Division of Water Pollution Control at your local Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at Hari.Akunuri@state.tn.us.

Sincerely,

Mr. Vojin Janjic
Manager, Permit Section
Division of Water Pollution Control

SOP-06017
PWAT28tdt.DOC

cc: Division of Water Pollution Control, Permit Section
Division of Water Pollution Control, Knoxville Environmental Field Office
Mr. Ron L. Graham, Tennessee Regulatory Authority, 460 James Robertson Parkway, Nashville,
TN 37243



EXHIBIT U

Internet Explorer address bar: http://www.tn.gov/.../Permit/PA/PART/RSOP/06045

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Tennessee Division of Water Resources (DWR)

[Permits](#)
[eDocuments](#)
[Exceptional TN Waters](#)
[Permit Appeals](#)
[Complaints](#)
[Inspections](#)
[Oil and Gas Wells](#)

Site ID	Parent Site	Location	City	County	GIS
22392	Tennessee Wastewater Systems, Inc. - Richland Creek Subdivision	Off CR-1812	Waverly	Humphreys	View Map

Permit Information

[Help](#) [Back to Previous Page](#)

Permit Number SOP-06045

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 02-AUG-2006

Application Complete 13-SEP-2006

Application Returned

Public Notice 04-MAY-2009

Issuance Date 31-OCT-2008

Effective Date 31-DEC-2008

Expiration Date 31-JAN-2012

Modification Date

Termination Date 30-JUN-2009

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation. This treatment facility has not been constructed, nor will it be anytime in the foreseeable future.

Treatment Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Flow Rate (MGD) .045

Record Last Updated 05-OCT-2016



EXHIBIT V

EXHIBIT
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V-1



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

Land Based Systems Inspection Report

Facility: Muddy Branch Reclamation Facility
Address: North Lock B Rd.
County: Montgomery City: Clarksville
UIC Authorization # SOP/NPDES sop-02014
Purpose of Visit: inspection
Responsible Management Entity: Tn. Wastewater

Type of System

	Latitude	Longitude
Conventional-Septic Tank		
Oxidation(Deep Cell) Lagoon		
Wisconsin Mound		
Low Pressure Pipe System (LPP)		
Recirculating Sand Filter		
Bio-Clear		
Quantics/Advantex Bio-Media Filter		
Recirculating Biological Contactor (RBC)		
Other-		

Dispersal Application

	Latitude	Longitude
Conventional-Dispersal		
LPP-Laterals		
Drip Spacing		
Spray		

Waste Stream Characterization Domestic Commercial/Industrial
Disinfection UV Chlorination Other None
Photos Taken Yes No X Number
Fencing Yes No Locations
Signs Yes No
Inhibited Access Yes No
Contour Yes No
Lagoon Discharging Yes No
Water Level Monitor Yes No
Design Capacity **Current Flow**

EXHIBIT

V-2

UIC/SOP# sop-02014**Site Conditions**

	Latitude	Longitude
Ponding		
Overflow		
Broken-Exposed Pipes/ Stuck Solenoids/Valves		
Water Source: Public Private		
Springs		
Private Water Wells		
Community Wells		
Non-Community Wells		
Wellhead Protection Areas		
Sourcewater Protection Areas		
Surface Water Intakes		
Karst Features		
Sinkhole/closed depression		

CommentsSite inspection for the issuance of the UIC/SOP AuthorizationThis is a proposed site. Currently, no construction has begun. The site is being
utilized for row cropping.36.3727469-87.3707577 coordinates at the gateInspected By: Timmy JennetteDate: 3-10-2014

Signature: _____

Timmy Jennette

EXHIBIT W

TN Department of
Environment &
Conservation

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
23097	Tennessee Wastewater Systems, Inc. - Providence Hill Subdivision	Sevierville, TN	Sevierville	Sevier	View Map

Permit Information

[Help](#)

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Permit Number SOP-06052

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 04-OCT-2011

Application Complete 15-SEP-2006

Application Returned

Public Notice

Issuance Date 30-NOV-2006

Effective Date 01-JAN-2007

Expiration Date 30-NOV-2011

Modification Date

Termination Date 01-MAR-2013

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Treatment Description Septic tanks, effluent collection system, recirculating sand filter and drip irrigation

Flow Rate [MGD] .018

Record Last Updated 05-OCT-2016

Permit Documents

View

File Type



Letter

Final termination letter



Report

RCVD VIA EMAIL 26-FEE



Letter

RCVD 30-MAY-12: letter t

Inspections

no data found

EXHIBIT

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EXHIBIT X

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TN Department of Environment & Conservation

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
21626	Sharcrest Exhibits	Morganton Road between Lou Goodhart Lane and Railway Drive	Maryville	Blount	View Map

Permit Information

[Back to Permit Page](#)

Permit Number SOP-07010

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 05-FEB-2007

Application Complete 09-FEB-2007

Application Returned

Public Notice 05-MAR-2007

Issuance Date 30-APR-2007

Effective Date 01-JUN-2007

Expiration Date 30-APR-2012

Modification Date

Termination Date 17-JAN-2013

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description Septic tanks, effluent collection system, recirculating sand filter, UV disinfection and 1.8 acre drip irrigation. The treatment facility have not been constructed, nor they ever will be.

Treatment Description Septic tanks, effluent collection system, recirculating sand filter, UV disinfection and 1.8 acre drip irrigation

Flow Rate (MGD) 01342

Record Last Updated 05-OCT-2018

Permit Documents

View	File Type
	Letter Final Termination letter
	Letter Termination request letter
	Letter RCVD 30-MAY-12 letter to H Charles Hyatt

Inspections

no data found





**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
401 CHURCH STREET
L & C ANNEX 6TH FLOOR
NASHVILLE TN 37243**

January 31, 2013

Mr. Charles R. Hyatt
CEO
Adenus Group, LLC
e-copy: Charles.Hyatt@adenus.com
849 Aviation Parkway
Smyrna, TN 37167

**Subject: Termination of State Operating Permit No. SOP-07010
TN Wastewater Systems - Sharondel Estates Subdivision
Maryville, Blount County, Tennessee**

Dear Mr. Hyatt:

This letter is to inform you the Division of Water Resources (the division) is terminating the above referenced permit effective the date of this letter because the treatment facilities have not been constructed, nor they ever will be.

If you have questions, please contact the Knoxville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at *Hari.Akunuri@tn.gov*.

Sincerely,

Vojin Janjić
Manager, Permit Section

Enclosure

cc: Permit Section File
Knoxville Environmental Field Office (woody.smith@tn.gov)
Mr. Allen Rather, DWS-Ground Water Management Section, Allen.rather@tn.gov
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, michelle.ramsey@tn.gov





849 Aviation Parkway
Smyrna, TN 37167

January 17, 2013

Hari Akunuri
Permit Section
Department Of Environment and Conservation
401 Church Street
L&C Annex Sixth Floor
Nashville TN 37243-1534

RE: SOP-07010 - TN Wastewater Systems – Sharondel Estates Sub.
SOP-07011 - TN Wastewater Systems – King's Bluff Cabins

Dear Hari:

Tennessee Wastewater Systems, Inc. requests that the above referenced permits be terminated. The treatment facility's have not been constructed, nor will they ever be.

If you have any questions, please contact me at this office.

Sincerely,

Charles Hyatt
President

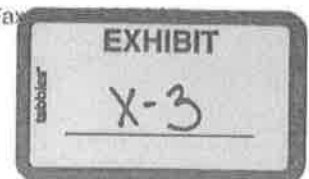


EXHIBIT Y

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TN Department of Environment & Conservation

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
31885	Tennessee Wastewater Systems - Smoky Mountain Reflections RV Park	Old Birds Creek Road	-	Sevier	View Map

[Help](#)
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Permit Information

Permit Number SOP-07063

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 15-AUG-2007

Application Complete 22-AUG-2007

Application Returned

Public Notice 14-MAY-2012

Issuance Date 31-OCT-2007

Effective Date 01-DEC-2007

Expiration Date 31-OCT-2012

Modification Date

Termination Date 31-AUG-2012

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SJC Code

Activity Description Septic tanks, effluent collection system, recirculating packed bed filter, UV disinfection and 1.03 acre drip irrigation area. This system is no longer in operation.

Treatment Description Septic tanks, effluent collection system, recirculating packed bed filter, UV disinfection and 1.03 acre drip irrigation area

Flow Rate (MGD) 000

Record Last Updated 05-OCT-2016

Permit Documents

View	File Type
	Letter Termination final letter
	Letter RCVD 30-MAY-12 letter Hyatt
	Letter Termination draft letter
	Letter RCVD 18-APR-12 letter

Inspections

no data found





**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER POLLUTION CONTROL
401 CHURCH STREET
L & C ANNEX 6TH FLOOR
NASHVILLE TN 37243**

September 6, 2012

Mr. Michael Hines, M.S., P.E.
Vice President
Tennessee Wastewater Systems, Inc.
1920 Breezy Ridge Trail
Concord, TN 37922

Subject: Termination of State Operating Permit No. **SOP-07063**
TN Wastewater Systems - Smokey Mountain Reflections RV Park
Sevier County, Tennessee

Dear Mr. Hines:

This letter is to inform you the Division of Water Pollution Control (the division) is terminating the above referenced permit effective the date of this letter.

If you have questions, please contact the Knoxville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at *Hari.Akunuri@tn.gov*.

Sincerely,

Vojin Janjic
Manager, Permit Section
Water Pollution Control

Enclosure

cc: Permit Section File
Knoxville Environmental Field Office (*woody.smith@tn.gov*)
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, *michelle.ramsey@tn.gov*



EXHIBIT Z

TN Department of Environment & Conservation

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
35555	Tennessee Wastewater Systems, Inc. - Milky Way Treatment Facility	Off Highway 31	-	Giles	View Map

Permit Information

[Help](#)

[Back to Previous Page](#)

Permit Number SOP-08011

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 15-FEB-2008

Application Complete 30-JUL-2008

Application Returned

Public Notice 11-AUG-2008

Issuance Date 30-SEP-2008

Effective Date 01-NOV-2008

Expiration Date 30-SEP-2013

Modification Date

Termination Date 30-SEP-2013

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description STEP collection system, recirculating media filter and fenced drip irrigation

Treatment Description Septic tanks, effluent collection system, recirculating media filter and fenced drip irrigation

Flow Rate [MGD] 0309

Permit Documents

View File Type

	Letter	SOP-08011_Termination_Final_Letter
	Report	Verification that privately-owned public sev
	Letter	RCVD 22-MAR-13: letter to Han Akunuri re

Inspections

no data found

EXHIBIT

Z-1



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

January 22, 2014

Mr. Charles Hyatt, President
Adenus Group, LLC
e-copy: charles.hyatt@adenus.com
849 Aviation Parkway
Smyrna, TN 37167

Subject: **Termination of State Operating Permit No. SOP-08011
TN Wastewater Systems - Milky Way Treatment Facility
Giles County, Tennessee**

Dear Mr. Hyatt:

This letter is to inform you the Division of Water Resources (the division) is terminating the above referenced permit effective the date of this letter pursuant to your written request of March 22, 2013, indicating that the facility has neither been constructed nor ever will be.

If you have questions, please contact the Columbia Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at Hari.Akunuri@tn.gov.

Sincerely,

Brad C. Harri, P.E.
Manager, Land-Based Systems

Enclosure

cc: Hon. Janet Vanzant, Giles County Mayor, JPVanzant@energize.net
Milky Way Farm, LLC, 2021 21st Ave. S, Ste 311, Nashville, TN 37212
Mr. John W. McCrary, Etux, 655 Milky Way Road, Pulaski, TN 38478
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, michelle.ramsey@tn.gov
Columbia Environmental Field Office, gary.horne@tn.gov
Permit File

EXHIBIT

2-2

EXHIBIT AA

File Edit View Favorites Tools Help

9) Pulse Connect Secure 1) Suggested Sites

Tennessee Division of Water Resources (DWR)

Permits eDocuments Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
34579	Saddle Ridge Community	Regan Valley Road		Moore	View Map

Permit Information

[Back to Previous Page](#)

Permit Number SOP-07092

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 27-DEC-2007

Application Complete 26-JUL-2008

Application Reformed

Public Notice

Issuance Date 30-SEP-2008

Effective Date 01-NOV-2008

Expiration Date 30-SEP-2013

Modification Date

Termination Date 02-DEC-2016

Receiving Stream N/A

Effluent Description No discharge allowed from this system

SIC Code

Activity Description Septic tanks, effluent collection system, rotating biological contactors and 15.0 acre fenced drip irrigation system

Treatment Description Septic tanks, effluent collection system, rotating biological contactors and 15.0 acre fenced drip irrigation system

Flow Rate (MGD) .01

Record Last Updated 02-NOV-2016

Permit Documents

View	File Type	Description
	Letter	SOP-07092_Saddle_Ridge_Administrative_Inactivation_Final_Letter
	Notice of Violation	SOP-07092 Saddle Ridge_Life_Application_MOV
	Letter	RCVD 30-MAY-12 letter to Harl Akumun re: change Official Contact for

Inspections

no data found





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

November 2, 2016

Mr. Charles R. Hyatt
CEO
Adenus Group, LLC
e-copy: Charles.Hyatt@adenus.com
849 Aviation Parkway
Smyrna, TN 37167

Subject: **Administrative Inactivation of State Operating Permit No. SOP-07092
Tennessee Wastewater Systems, Inc.
Saddle Ridge Community
Monroe County, Tennessee**

Dear Mr. Hyatt:

This letter is to inform you the Division of Water Resources (the division) is administratively inactivating the file record the above referenced permit for the following reasons:

- The above referenced SOP expired on 30-SEP-13. The division mailed a warning letter on 22-JUL-14, regarding the application deadline for a permit renewal. To date we have not received this application from your company;
- The division never received evidence of ownership of the treatment facility land application site(s) and/or a copy of the perpetual easement(s) as required by the permit; and
- The division has not approved plans and specifications for construction of a sewage treatment system;
- A sewerage treatment system has neither been constructed nor provided to your utility for use in providing utility service.

This administrative inactivation of the file record will become effective from 30days from the date of this letter. If you have questions, please contact the Knoxville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at *Hari.Akunuri@tn.gov*.

Sincerely,

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

Enclosure

cc: Permit File
Knoxville Environmental Field Office
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, *michelle.ramsey@tn.gov*
Ms. Patsy Fulton, Utility Rate Specialist, Tennessee Regulatory Authority, *Patsy.Fulton@tn.gov*



EXHIBIT BB

EXHIBIT
tabbies
BB-1



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

November 2, 2016

Mr. Charles R. Hyatt
CEO
Adenus Group, LLC
e-copy: Charles.Hyatt@adenus.com
849 Aviation Parkway
Smyrna, TN 37167

Subject: **Administrative Inactivation of State Operating Permit No. SOP-08056
Tennessee Wastewater Systems, Inc.
Scenic River Development
Madisonville, Monroe County, Tennessee**

Dear Mr. Hyatt:

This letter is to inform you the Division of Water Resources (the division) is administratively inactivating the file record the above referenced permit for the following reasons:

- The above referenced SOP expired on 30-NOV-13. The division mailed a warning letter on 22-JUL-14, regarding the application deadline for a permit renewal. To date we have not received this application from your company;
- The division never received evidence of ownership of the treatment facility land application site(s) and/or a copy of the perpetual easement(s) as required by the permit; and
- The division has not approved plans and specifications for construction of a sewage treatment system;
- A sewerage treatment system has neither been constructed nor provided to your utility for use in providing utility service.

This administrative inactivation of the file record will become effective from 30days from the date of this letter. If you have questions, please contact the Knoxville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at Hari.Akunuri@tn.gov.

Sincerely,

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

Enclosure

cc: Permit File
Knoxville Environmental Field Office
Ms. Patsy Fulton, Utility Rate Specialist, Tennessee Regulatory Authority, Patsy.Fulton@tn.gov
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, michelle.ramsey@tn.gov

EXHIBIT

BB-2

EXHIBIT CC

http://www.tn.gov/.../report.aspx?reportID=7014-0001...NO.3402-PR001, PERMIT_NUMBER:SOP-08006

File Edit View Favorites Tools Help

☆ Pulse Connect Secure Suggested Sites

Tennessee Division of Water Resources (DWR)

Permits Documents Exceptional TN Waters Permit Appeals Complaints Inspections Oil and Gas Wells

Site ID	Parent Site	Location	City	County	GIS
35992	The Preserve at Eagle Rock	Boatmans Mountain Road	-	Hamblen	View Map

Permit Information

[Back to Previous Page](#)

Permit Number SOP-08006

Permittee Name Tennessee Wastewater Systems, Inc.

Permit Type SOP

Status Inactive

Permit Rating

Facility Classification M

Discharge Code DI

Application Received 20-NOV-2008

Application Complete 24-NOV-2008

Application Returned

Public Notice 23-JUN-2014

Issuance Date 19-NOV-2009

Effective Date 01-DEC-2009

Expiration Date 01-NOV-2014

Modification Date

Termination Date 01-AUG-2014

Receiving Stream N/A

Effluent Description No discharge allowed from the system

SIC Code

Activity Description STEP collection system, recirculating packed bed filter, UV disinfection and 3.01 acre drip irrigation

Treatment Description Septic tanks, effluent collection system, recirculating packed bed filter, UV disinfection and drip irrigation

Flow Rate (MGD) 0.027

Record Last Updated 05-OCT-2016

Permit Documents

View	File Type	Desc
	Notice of Termination	SOP08006 Eagle Rock_Termination_Final_Letter
	Letter	SOP-08006 The Preserve at Eagle Rock_Termination_Draft_Letter
	Public Notice Document	June 2014 public notice
	Email	SOP-08006 - TWS - The Preserve at Eagle Rock (Requesting for term
	Letter	RCVD 30-MAY-12: letter to Hank Akumun re: change Official Contact In
	Letter	Plans approval for drip system
	Permit	Final Permit
	Notice of Determination	NOD
	Letter	Letter from Mr. DeGraw repeating issues he considers important from
	Image	Photos dated 4/22/09 and others
	Email	Questions from Woody Smith concerning karst conditions at Boatman
	Letter	Request for letter confirming hearing from Alan DeGraw, reply from KE

Inspections

no data found





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

August 7, 2014

Mr. Charles R. Hyatt
CEO
Adenus Group, LLC
e-copy: Charles.Hyatt@adenus.com
849 Aviation Parkway
Smyrna, TN 37167

Subject: **Termination of State Operating Permit No. SOP-08006
TN Wastewater Systems - The Preserve at Eagle Rock
Hamblen County, Tennessee**

Dear Mr. Hyatt:

This letter is to inform you the Division of Water Resources (the division) is terminating the above referenced permit effective the date of this letter.

If you have questions, please contact the Knoxville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Hari Akunuri at (615) 532-0650 or by E-mail at *Hari.Akunuri@tn.gov*.

Sincerely,

Brad C. Harris
Manager, Land-Based Systems

Enclosure

cc: Permit File
Knoxville Environmental Field Office
Mr. & Mrs. Charles & Winnie McCracken, , 3270 Boatman Road, Morristown, TN 37814
Mr. Alan DeGraw, , 3240 Boatman's Mountain Road, Morristown, TN 37814
Mr. James Coffey, , 3256 Boatman Mountain Rd., Morristown, TN 37814
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, michelle.ramsey@tn.gov



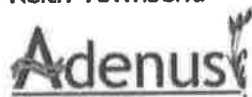
Karen H. Stachowski

From: Keith Townsend <keith.townsend@adenus.com>
Sent: Thursday, April 24, 2014 2:50 PM
To: Hari Akunuri
Subject: SOP-08006 - TWS - The Preserve at Eagle Rock

Hari,

We have an existing permit for the above site that expires in November. We are not going to renew that permit.

Thanks,
Keith Townsend



www.Adenus.com
Sustainable Wastewater Solutions
615.220.7166 (voice)
615.220.7207 (fax)
615.522.7865 (cell)



EXHIBIT DD

TENNESSEE REGULATORY AUTHORITY



Eddie Roberson, Chairman
Tre Hargett, Director
Sara Kyle, Director
Ron Jones, Director

RECEIVED

2008 MAY 28 AM 10:38

460 James Robertson Parkway
 Nashville, TN 37243-1001
TRA DOCKET ROOM

May 23, 2008

Mr. Charles Pickney, Jr., President
 Tennessee Wastewater Systems, Inc.
 851 Aviation Parkway
 Smyrna, Tennessee 37167

RE: Tennessee Department of Environment and Conservation ("TDEC") permits
 pursuant to TRA Rule 1220-4-13-.04. (1)(c)

Dear Mr. Pickney:

Following is a list of territories that have been granted a Certificate of Convenience and Necessity (CCN), but the authority has not received a copy of the final TDEC permits.

Service Territories	TRA Docket	Permit No.
Oakwood Subdivision	93-09040	SOP-96035
Swan Harbour Subdivision	97-01003	SOP-98033
South Ridge Estates	97-01104	SOP-02036
Lewis Gardens Subdivision	97-01393	SOP-98041
Abington Ridge (Milcrofton)	97-01393	SOP-03038
Arno Page Treatment Facility (Milcrofton)	97-01393	SOP-05069
Saddle Springs (Milcrofton)	97-01393	SOP-01027
Watkins Creek (Milcrofton)	97-01393	NR 0604.065
River Road	97-01394	TN-0074764
Millview Treatment Facility	97-01394	SOP-03038
Tall Oaks Subdivision	98-00790	SOP-99024
Windsor Pointe (D.L. Hudson)	98-00881	SOP-98050
Cornerstone of Mitchell Creek	99-00357	SOP-99022
Bolton Estates Subdivision	99-00724	SOP-04050
Harbor Pointe	00-00149	SOP-00011
Townsend Town Square	00-00272	SOP-99016
Hidden Springs Resort	00-00379	SOP-00068
Starr Crest Resort	00-00379	SOP-00019
Hidden Springs Resort - Wastewater System #2	00-00379	SOP-07047
Maple Green (Coopertown)	00-01128	SOP-01028
Oak Point (Coopertown)	00-01128	SOP-01028
Pebble Brooke (Coopertown)	00-01128	SOP-01029
Watts Road (Coopertown)	00-01128	SOP-01015

Telephone (615) 741-2904, Toll-Free 1-800-342-8359, Facsimile (615) 741-5015
www.state.tn.us/tra



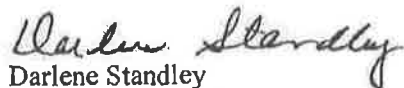
Eagle Crest Resort	01-00183	SOP-03042
Eagle Crest Resorts	01-00183	SOP-00018
Topside Investment Group	01-00220	SOP-02003
Jackson Bend Subdivision	01-00221	SOP-01009
Dyers Hollow (Stewart Co East)	01-00229	SOP-01006
Hoffman Subdivision (Blue Water Bay)	01-00425	SOP-01025
Herndon's Bluegrass Market	01-00446	SOP-01017
Browning Subdivision	01-00492	SOP-01024
Starr Crest II Resorts	01-00755	SOP-01033
K & j Market	01-00756	SOP-01026
Horseshoe Bend Condominiums	01-01025	SOP-01048
Stewart Co. W. (Cindy's Restaurant)	02-00477	Reg. by GWP
Falling Waters	02-00782	SOP-02023
Black Bear Ridge Resort	03-00192	SOP-03002
Black Bear Ridge Resort #2	03-00192	SOP-05077
Boswell Road (Tims Ford)	03-00286	SOP-03018
Fanning Bend Treatment Facility	03-00286	SOP-05030
Cedar Hill Baptist Church	03-00287	SOP-02020
Sunnybrook Farms	03-00307	SOP-03015
Legacy Mountain East	03-00329	SOP-04004
Legacy Preserve # 1 Resort	03-00329	SOP-04045
Timber Tops Rental	03-00329	SOP-04025
Smoky Cove Subdivision	03-00377	SOP-03021
King Branch Road	03-00386	SOP-05043
King's Bluff Cabins	03-00386	SOP-07011
Weigel's	03-00519	
Paris Landing	03-00544	SOP-03022
Turner's Landing Subdivision	04-00053	SOP-03031
DeShea Cr. (Marion Womack)	04-00170	SOP-04022
Arbor Crest	04-00171	SOP-00032
Merril Taylor Subdivision (Louisville)	04-00274	SOP-04034
Marvin Keys RV Park	05-00071	SOP-05011
Brownlee Commercial Building	05-00078	SOP-03056
Blackberry Ridge	05-00111	SOP-05032
Grainger's Landing Condominums	05-00117	SOP-05025
German Creek Marina and Resort	05-00138	SOP-05045
Smoky Village Subdivision	05-00145	SOP-05033
Clarkrange Treatment Facility	05-00162	SOP-07059
The Highlands	05-00162	SOP-04040
Elk Springs Resort	05-00211	SOP-05070
Cedar Hill Area (Robertson Co.)	05-00212	SOP-05039

Brigadoon Resort (Roane Co.)	05-00241	SOP-05051
Cross Plains	05-00293	SOP-05057
Lowe's Ferry Landing	05-00339	SOP-05071
Riversedge Phase II	05-00340	SOP-05067
Muddy Branch Reclamation Facility	06-00184	SOP-02014
Shady Cove	07-00055	SOP-06022
Norton Creek - Hickory Gap STP	07-00087	SOP-07021
Reserve on the Tennessee River	07-00195	SOP-07003
Smokey Mountain Reflections R.V. Park	07-00235	SOP-07063

Please file a copy of the final TDEC permit with the Docket Room for placement in the docket file. If a final permit has not been received, provide the status of the permit stating whether the application has been filed. If not, why not? If filed, provide a complete status of application at TDEC (if pending, why pending) (if project on hold, why is it on hold) and estimated date for completion of the project in each of the above Dockets no later than 2:00 P.M. on Friday, June 6, 2008.

Should you have any questions regarding this request, please contact Michelle Ramsey at 615-741-2904 ext. 172.

Sincerely,



Darlene Standley
Chief of Utilities Division

C: Docket File

MR08-16