

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION  
AT NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>PETITION OF TENNESSEE</b>	)	
<b>WASTEWATER SYSTEMS, INC., TO</b>	)	<b>DOCKET NO. 22-00133</b>
<b>AMEND ITS CERTIFICATE OF</b>	)	
<b>CONVENIENCE AND NECESSITY</b>	)	

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**PETITION TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY  
TO INCLUDE HILLTOP RIDGE SUBDIVISION**

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Tennessee Wastewater Systems, Inc. ("TWSI", "Utility", or "Company") petitions the Tennessee Public Utility Commission ("TPUC") to amend its Certificate of Convenience and Necessity to expand its service area to include a residential subdivision known as Hilltop Ridge in Montgomery County.

As demonstrated in the application and attached exhibits, there is a public need for service and TWSI has the requisite management experience, financial capability, and technical expertise to provide such service pursuant to the rules and regulations of the Commission. In support of its Petition, TWSI states as follows:

**General Information:**

1. The applicant is Tennessee Wastewater Systems, Inc. which is located at 851 Aviation Parkway, Smyrna, TN 37167.
2. **Organizational Chart** – See Exhibit 2
3. Tennessee Wastewater Systems, Inc. is wholly owned by Adenus Group, LLC. The members of Adenus Group, LLC are Thomas Pickney, William



Pickney, and Robert Pickney. 849 Aviation Parkway, Smyrna, TN 37167. Each owns 33.3% of Adenus Group, LLC.

4. **Corporate Organizational Chart with Affiliates** – See Exhibit 4 – Adenus Technologies, LLC will provide certain materials and supplies to the project as well as panels and telemetry monitoring to the system. Adenus Solutions Group, LLC will construct the wastewater treatment system and drip field. TWSI is aware of and will abide by the Commission's affiliate transaction rules with respect to transactions between TWSI and its affiliates.
5. **Articles of Incorporation** – See Exhibit 5
6. **Tennessee Business License** – See Exhibit 6
7. **Description of Geographic Territory** – The Hilltop Ridge Subdivision is located in Montgomery County and is bordered by River Road on the east, and Hilltop View Road to the northwest. The closest highway is TN State Route 149. See Exhibit 7 for maps detailing the residential development location, the lots to be served, and the location of the wastewater facilities (highlighted in pink for treatment plant and yellow for drip areas).
8. **Description of the Proposed Wastewater System** – The proposed system is designed for 20,400 gpd of wastewater flow, comprised of a watertight effluent pressure collection system, utilizing STEP/STEG tanks and a recirculating media filter treatment system. The treated effluent will be land applied for disposal.
9. **Estimated Dates for commencement and completion of construction** – Construction will commence at a time agreeable between the developer and its contractor and will take approximately 180 days. TWSI is aware of TPUC Rule 1220-04-13-.09(7) and fully expects the wastewater system to be completed within 3 years from the date of the written order granting the CCN. Notice of completion of the system will be filed in this docket as required by the Rule.
10. **Phases/Houses per Phase** – The subdivision will be built in one phase consisting of sixty-eight (68) single family houses.
11. **Builder/Developer Identity** – See Request to Serve Letter Exhibit 11

Robert S. Powers  
Powers & Atkins, LLC



46 Union Street  
Clarksville, TN 37040  
931-245-0037

and

Bryce A. Powers  
Riverland Partners  
46 Union Street  
Clarksville, TN 37040  
931-245-0037 x. 101  
[bryce@pb-llc.com](mailto:bryce@pb-llc.com)

**Existence of Public Need and Property Rights**

12. **Letters from local governments and utilities** – See Exhibits 12A, 12B, and 12C – Property Owner Affidavit
13. **Franchise Agreement** – n/a
14. **Contracts and Agreements** – See Exhibits 14A (Sewer Service Agreement) and 14B Construction Contract.

**Managerial Ability:**

15. **Biographies of officers and key wastewater utility staff w/ list of certifications or professional licenses** – See Exhibit 15
16. TWSI is a certified wastewater provider in the State of Tennessee. Its parent company Adenus Group, LLC owns certified wastewater providers in Alabama, Ohio, and Kentucky.
17. **Merger/Acquisition** – n/a
18. **Treatment System Contractor** – Adenus Solutions Group, LLC is the contractor to build the system. They are a TWSI affiliate. TWSI is aware of and will abide by the affiliate rules of the Commission. The contractor's license is Exhibit 18.

**Technical Ability:**



19. **SOP Application/Permit** – See Exhibit 19A (Application), 19B (Draft SOP), and 19C (Notice of Complete Application). The final SOP will be filed in this docket once issued by TDEC.
20. **State Operator Certificate** – See Exhibit 20
21. **TWSI Contact Person:**  
  
Matthew Nicks  
Tennessee Wastewater Systems, Inc.  
615-220-7200  
[Matthew.Nicks@adenus.com](mailto:Matthew.Nicks@adenus.com)
22. **Engineering Certification** –The system has not been constructed at this time. The certification will be filed in this docket upon acceptance of the system by TWSI.

**Financial Capability:**

23. **Financial Statements** – See Exhibits 23A, 23B, and 23C.
24. **Pro Forma (Five years of operations)** –With over 5000 customers, the addition of the Hilltop Ridge subdivision will have minimal impact to the Company's overall finances (as shown in Exhibits 23 and 31).
25. **NARUC Chart of Accounts** – See Exhibit 25
26. **Plant in service account numbers** – See Exhibit 26
27. **Depreciation rates/schedule** – Depreciation is straight line with the following schedule:  
  
Building – 15 years  
Fence – 7 years  
Panel – 7 years  
Tank – 10 years  
Treatment – 26 years
28. **Estimated Cost of Construction** – See Exhibit 28.



29. **TWSI will own the system once it is completed, inspected, and accepted by the Utility.** Estimated amount of contributed capital will include the treatment plant and collection system, as well as the cost of the land conveyed to the Utility. These costs are not known at this time but will be filed in this Docket along with the actual cost of the treatment system when provided by the Developer to TWSI, no later than at the time the final plat is signed by the Utility. Contributed Capital is recorded when the system is commissioned (accepted) by debiting the appropriate utility plant in service asset account and crediting the CIAC account.
30. **Tariff** – On file with the Commission. See Exhibit 30 for addition of the Hilltop Ridge Subdivision to the residential tariff sheets.
31. **Five Year Build Out Estimate of Development** – See Exhibit 31
32. **Municipal Bonding Requirements** – No municipal bonding required.
33. **Performance Bond** – A performance bond from the developer will be provided and a copy will be filed in this docket prior to the commencement of construction for this project.
34. **Funding Sources** - The developer is responsible for funding the construction of the wastewater system.
35. **Financial Security** – On file with the Commission.

THEREFORE, having shown that a public need exists and that TWSI possesses the requisite managerial, technical, and financial capabilities to provide service to the Hilltop Ridge Subdivision in Robertson County, Tennessee, TWSI respectfully requests the Commission's approval of this Petition.

RESPECTFULLY SUBMITTED,

  
\_\_\_\_\_  
Jeff Ridsen (BPR No. 32769)  
General Counsel



Tennessee Wastewater Systems, Inc.  
851 Aviation Parkway  
Smyrna, TN 37167  
(615) 220-7171  
[jeff.risden@adenus.com](mailto:jeff.risden@adenus.com)



**Tennessee Wastewater Systems, Inc.**

**Organizational Chart**

**Jeff Ridsen, CEO**

**Matthew Nicks, President**

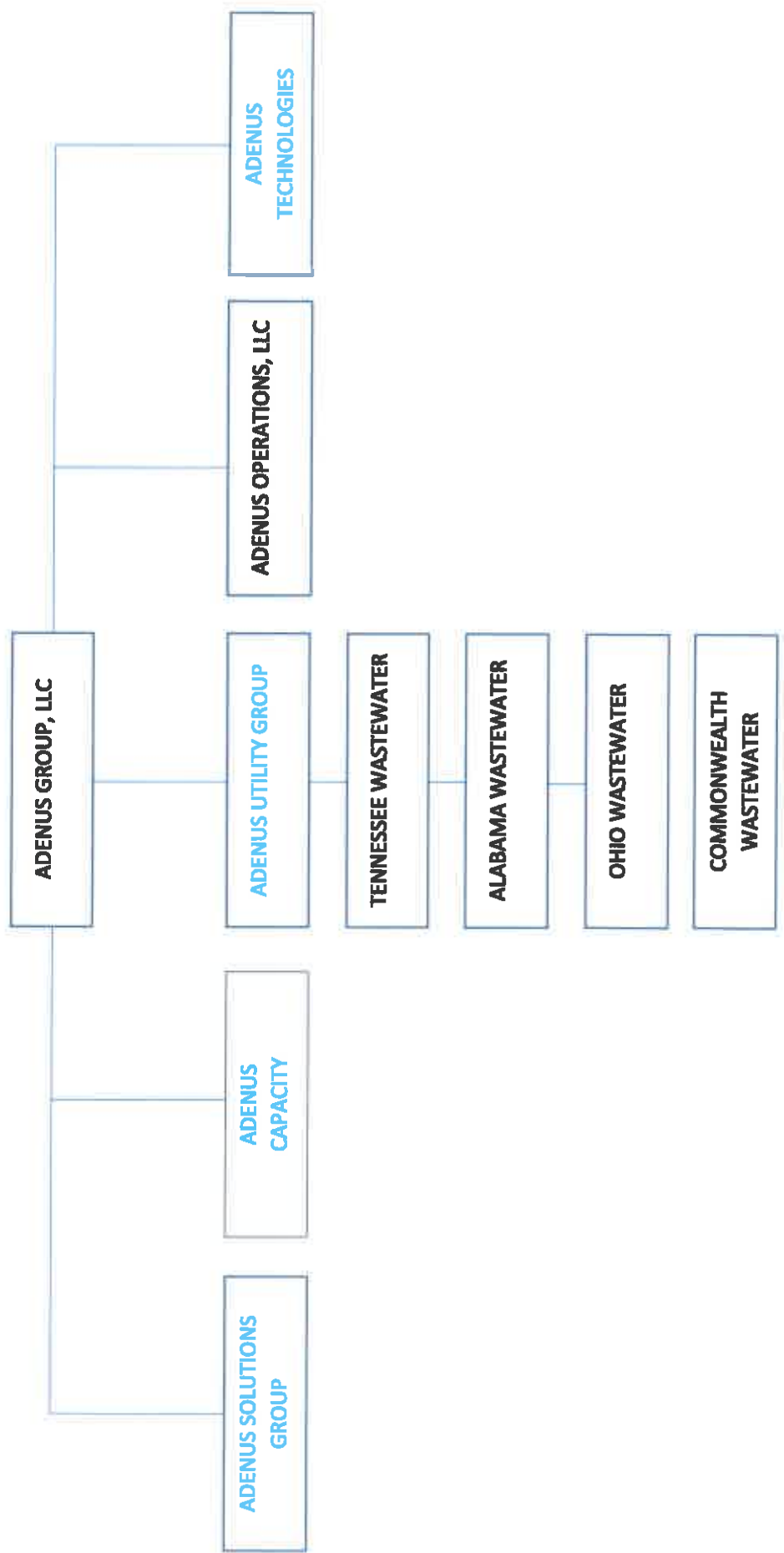
**Thomas Pickney, Secretary**

**William Pickney, Treasurer**

**Tim Barber, Controller**



ADENUS GROUP, LLC  
AFFILIATE  
ORGANIZATIONAL CHART





EX.5



Department of State  
Corporate Filings  
312 Eighth Avenue North  
6th Floor, William R. Snodgrass Tower  
Nashville, TN 37243

4348 1732

ARTICLES OF AMENDMENT  
TO THE CHARTER  
(For-Profit)

For Office Use Only

FILED  
RECEIVED  
JUN 21 2003  
CLERK OF THE  
STATE

CORPORATE CONTROL NUMBER (IF KNOWN) 0263854

PURSUANT TO THE PROVISIONS OF SECTION 48-20-106 OF THE TENNESSEE BUSINESS CORPORATION ACT, THE UNDERSIGNED CORPORATION ADOPTS THE FOLLOWING ARTICLES OF AMENDMENT TO ITS CHARTER:

1. PLEASE INSERT THE NAME OF THE CORPORATION AS IT APPEARS OF RECORD:

ON-SITE SYSTEMS, INC.

IF CHANGING THE NAME, INSERT THE NEW NAME ON THE LINE BELOW:

Tennessee Wastewater Systems, Inc.

2. PLEASE MARK THE BLOCK THAT APPLIES:

- ☒ AMENDMENT IS TO BE EFFECTIVE WHEN FILED BY THE SECRETARY OF STATE.  
☐ AMENDMENT IS TO BE EFFECTIVE, \_\_\_\_\_ (MONTH, DAY, YEAR)

(NOT TO BE LATER THAN THE 90TH DAY AFTER THE DATE THIS DOCUMENT IS FILED.) IF NEITHER BLOCK IS CHECKED, THE AMENDMENT WILL BE EFFECTIVE AT THE TIME OF FILING

3. PLEASE INSERT ANY CHANGES THAT APPLY:

A. PRINCIPAL ADDRESS: \_\_\_\_\_ STREET ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ STATE/COUNTRY \_\_\_\_\_ ZIP CODE \_\_\_\_\_

B. REGISTERED AGENT: \_\_\_\_\_

C. REGISTERED ADDRESS: \_\_\_\_\_ STREET ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ TN \_\_\_\_\_ OFFICE \_\_\_\_\_ COUNTY \_\_\_\_\_

D. OTHER CHANGES:

4. THE CORPORATION IS FOR PROFIT.

5. THE MANNER (IF NOT SET FORTH IN THE AMENDMENT) FOR IMPLEMENTATION OF ANY EXCHANGE, RECLASSIFICATION, OR CANCELLATION OF ISSUED SHARES IS AS FOLLOWS:

6. THE AMENDMENT WAS DULY ADOPTED ON June 30, 2003 (MONTH, DAY, YEAR)  
BY (Please mark the block that applies):

- ☐ THE INCORPORATORS WITHOUT SHAREHOLDER ACTION, AS SUCH WAS NOT REQUIRED.  
☒ THE BOARD OF DIRECTORS WITHOUT SHAREHOLDER APPROVAL, AS SUCH WAS NOT REQUIRED.  
☐ THE SHAREHOLDERS.

PRESIDENT  
SIGNER'S CAPACITY

Charles L. Pickney, Jr.  
SIGNATURE

DATE

Charles L. Pickney, Jr.  
NAME OF SIGNER (TYPED OR PRINTED)





**Tre Hargett**  
Secretary of State

## Division of Business Services

### Department of State

State of Tennessee

312 Rosa L. Parks AVE, 6th FL

Nashville, TN 37243-1102

JEFF RISDEN  
JEFF RISDEN  
851 AVIATION PARKWAY  
SMYRNA, TN 37167

February 8, 2021

Request Type: Certificate of Existence/Authorization  
Request #: 0402117

Issuance Date: 02/08/2021  
Copies Requested: 1

#### Document Receipt

Receipt # : 006056982	Filing Fee:	\$20.00
Payment-Credit Card - State Payment Center - CC #: 3798738680		\$20.00

Regarding: TENNESSEE WASTEWATER SYSTEMS, INC.

Filing Type: For-profit Corporation - Domestic

Formation/Qualification Date: 03/16/1993

Status: Active

Duration Term: Perpetual

Business County: RUTHERFORD COUNTY

Control # : 263854

Date Formed: 03/16/1993

Formation Locale: TENNESSEE

Inactive Date:

#### CERTIFICATE OF EXISTENCE

I, Tre Hargett, Secretary of State of the State of Tennessee, do hereby certify that effective as of the issuance date noted above

#### TENNESSEE WASTEWATER SYSTEMS, INC.

\* is a Corporation duly incorporated under the law of this State with a date of incorporation and duration as given above;

\* has paid all fees, interest, taxes and penalties owed to this State (as reflected in the records of the Secretary of State and the Department of Revenue) which affect the existence/authorization of the business;

\* has filed the most recent annual report required with this office;

\* has appointed a registered agent and registered office in this State;

\* has not filed Articles of Dissolution or Articles of Termination. A decree of judicial dissolution has not been filed.

Tre Hargett  
Secretary of State

Processed By: Cert Web User

Verification #: 044379741



# Hilltop Ridge Treatment Facility Wastewater Treatment, STEP System, Collection and Drip Dispersal Plans MONTGOMERY COUNTY, TN

## SOP -            Sewer Plans

Sheet No.	Title
C&D	Cover Sheet
CU1	Master Plan
CU2-CU11	Wastewater Collection Plans
CU12-CU14	Drip Dispersal



LOCATION MAP

**Consultants:**  
**Engineers:**  
 Hilltop Ridge Treatment Facility  
 Wastewater Treatment  
 Collection and Drip Dispersal Plans  
 Montgomery County, TN

**East Montgomery  
 Utility District:**  
 10000 Highway 100  
 Nashville, TN 37203  
 Phone: (615) 259-1000

**Tennessee Wastewater  
 Systems, Inc.:**  
 10000 Highway 100  
 Nashville, TN 37203  
 Phone: (615) 259-1000

**Floodplain Note:**  
 The Hilltop Ridge Treatment Facility is located within the floodplain of the Tennessee River. The floodplain is shown on the attached map. The floodplain is shown on the attached map. The floodplain is shown on the attached map.

**Trunk Line Land Drain:**  
 The Hilltop Ridge Treatment Facility is located within the floodplain of the Tennessee River. The floodplain is shown on the attached map. The floodplain is shown on the attached map. The floodplain is shown on the attached map.

**STEP Land Drain:**  
 The Hilltop Ridge Treatment Facility is located within the floodplain of the Tennessee River. The floodplain is shown on the attached map. The floodplain is shown on the attached map. The floodplain is shown on the attached map.

**Yard Requirements:**  
 The Hilltop Ridge Treatment Facility is located within the floodplain of the Tennessee River. The floodplain is shown on the attached map. The floodplain is shown on the attached map. The floodplain is shown on the attached map.

**Drainage Note:**  
 The Hilltop Ridge Treatment Facility is located within the floodplain of the Tennessee River. The floodplain is shown on the attached map. The floodplain is shown on the attached map. The floodplain is shown on the attached map.

**STEP Design:**  
 The Hilltop Ridge Treatment Facility is located within the floodplain of the Tennessee River. The floodplain is shown on the attached map. The floodplain is shown on the attached map. The floodplain is shown on the attached map.

**Drainage Note:**  
 The Hilltop Ridge Treatment Facility is located within the floodplain of the Tennessee River. The floodplain is shown on the attached map. The floodplain is shown on the attached map. The floodplain is shown on the attached map.

Sheet C&D  
 Hilltop Ridge  
 Wastewater  
 Collection and Drip  
 Dispersal Plans  
 Montgomery County, TN

**S.F.C. Inc.**  
 10000 Highway 100  
 Nashville, TN 37203  
 Phone: (615) 259-1000

**ADENUS SOLUTIONS GROUP**  
 849 AVIATION PARKWAY  
 SMYRNA, TN 37167

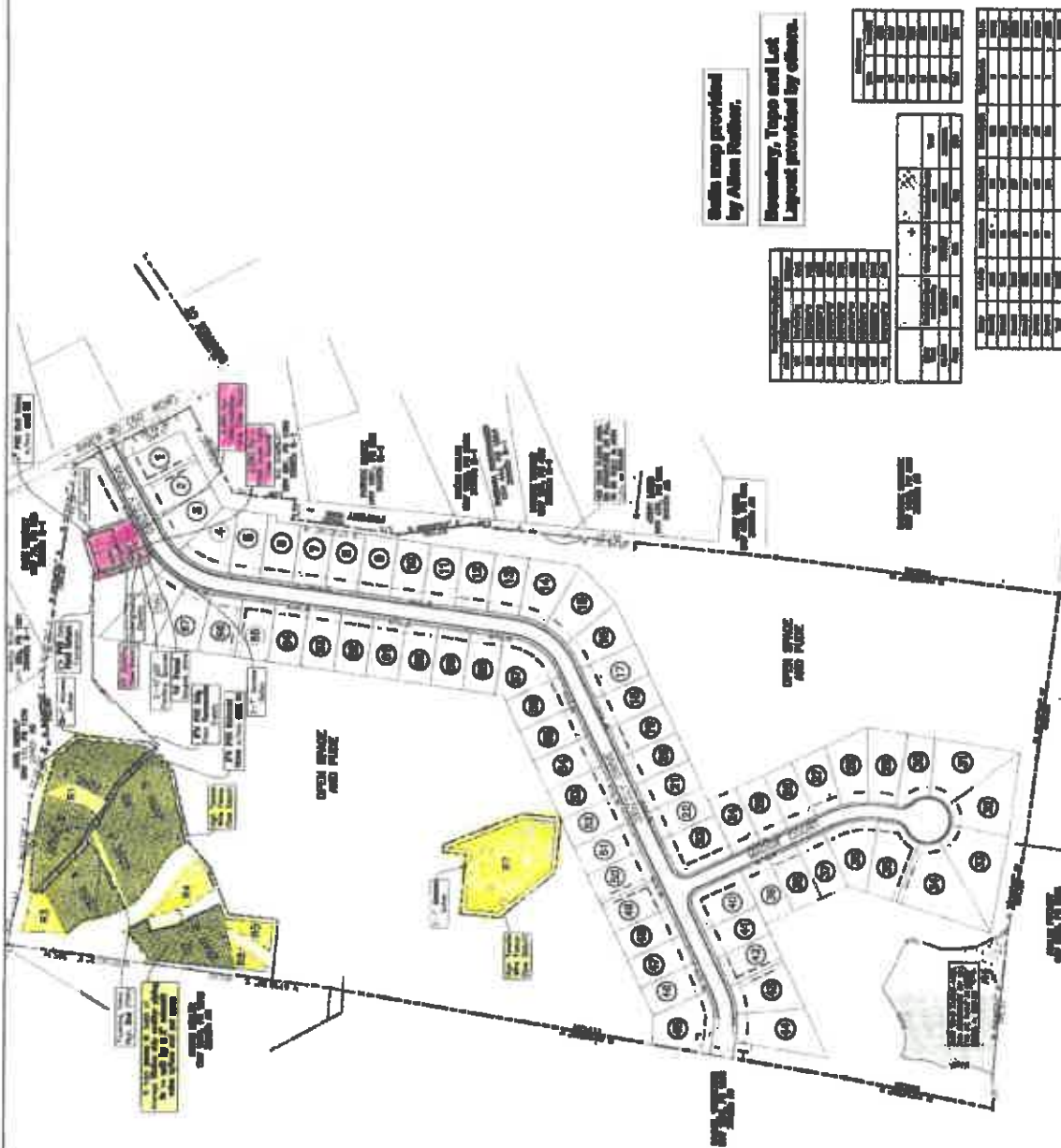
**Re: Hilltop Ridge**  
 Design: 10/24/2002  
 License: 10/24/2002

ADENUS SOLUTIONS GROUP 849 AVIATION PARKWAY SMYRNA, TN 37167

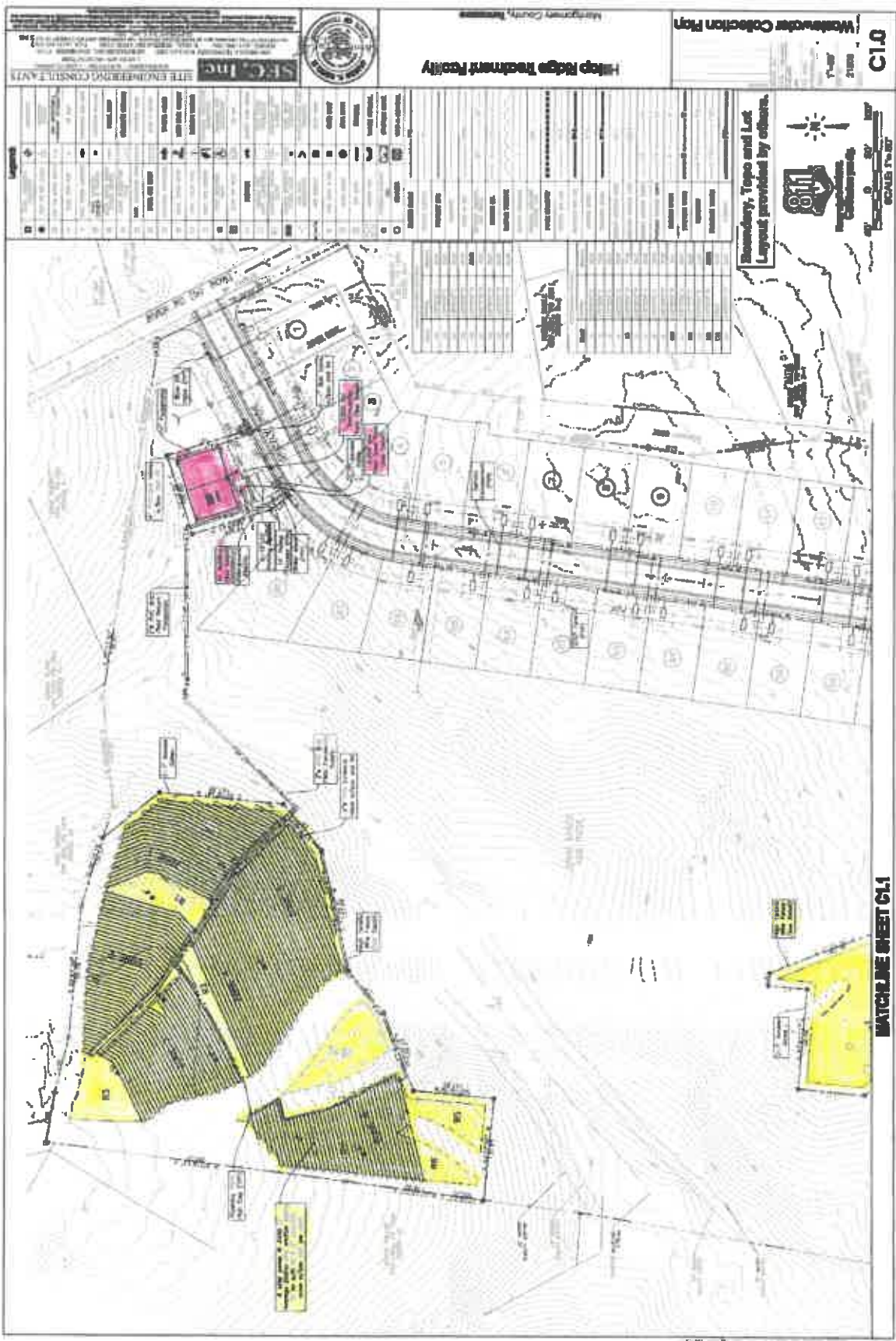
EX-7



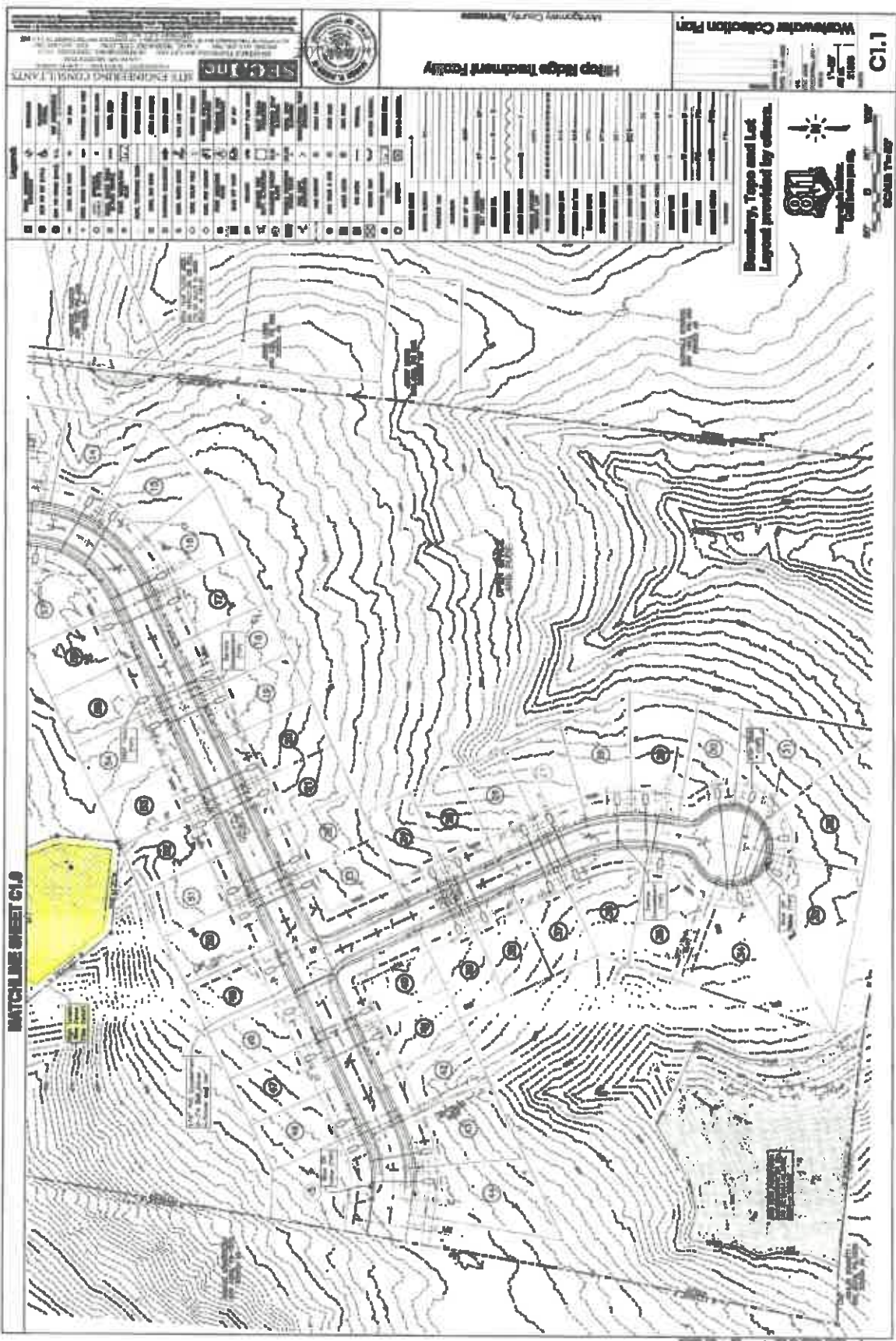
**Boundary, Tape and Lot Layout provided by owner.**











MATCH LINE SHEET C1.0

**Waterwatch Collection Plan**

**C1.1**

Scale: 1" = 100'

North Arrow

Legend

**Top Ridge Treatment Facility**

Madison County, Tennessee

**SEEG, Inc.**

Site Engineering and Consulting

Lot No.	Area (Ac.)	Topography	Soils	Vegetation	Water Features	Other Notes
1	0.15	Rolling	Clay	Hardwood	Stream	
2	0.15	Rolling	Clay	Hardwood	Stream	
3	0.15	Rolling	Clay	Hardwood	Stream	
4	0.15	Rolling	Clay	Hardwood	Stream	
5	0.15	Rolling	Clay	Hardwood	Stream	
6	0.15	Rolling	Clay	Hardwood	Stream	
7	0.15	Rolling	Clay	Hardwood	Stream	
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12	0.15	Rolling	Clay	Hardwood	Stream	
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22	0.15	Rolling	Clay	Hardwood	Stream	
23	0.15	Rolling	Clay	Hardwood	Stream	
24	0.15	Rolling	Clay	Hardwood	Stream	
25	0.15	Rolling	Clay	Hardwood	Stream	
26	0.15	Rolling	Clay	Hardwood	Stream	
27	0.15	Rolling	Clay	Hardwood	Stream	
28	0.15	Rolling	Clay	Hardwood	Stream	
29	0.15	Rolling	Clay	Hardwood	Stream	
30	0.15	Rolling	Clay	Hardwood	Stream	
31	0.15	Rolling	Clay	Hardwood	Stream	
32	0.15	Rolling	Clay	Hardwood	Stream	
33	0.15	Rolling	Clay	Hardwood	Stream	
34	0.15	Rolling	Clay	Hardwood	Stream	
35	0.15	Rolling	Clay	Hardwood	Stream	
36	0.15	Rolling	Clay	Hardwood	Stream	
37	0.15	Rolling	Clay	Hardwood	Stream	
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40	0.15	Rolling	Clay	Hardwood	Stream	

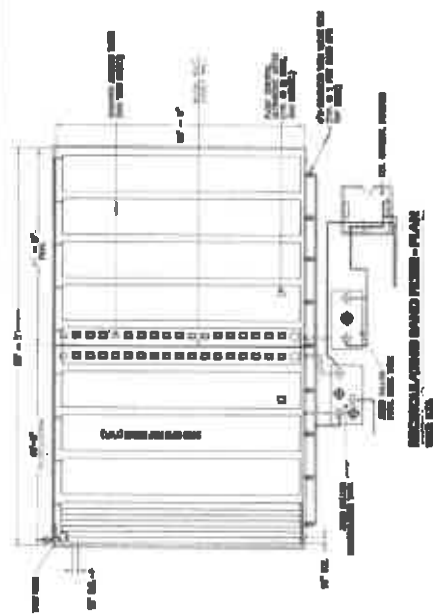
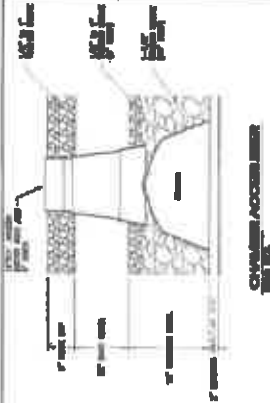
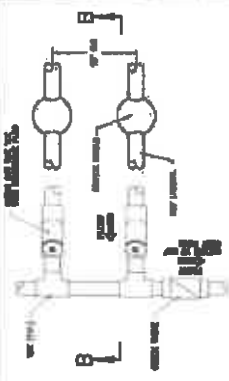
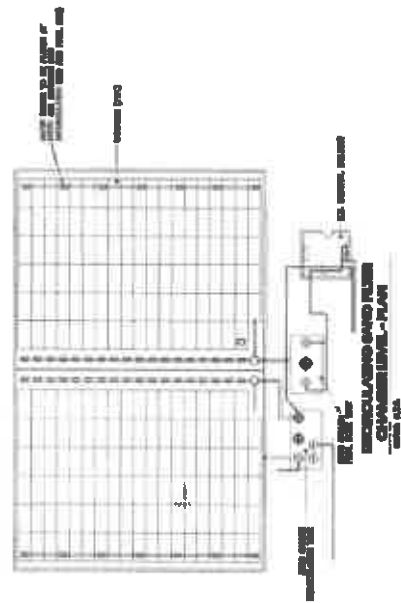
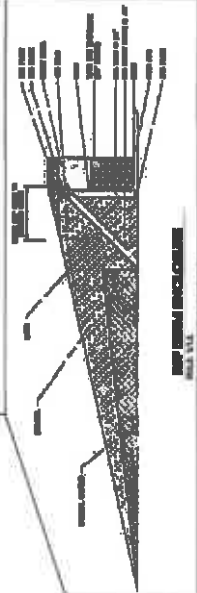
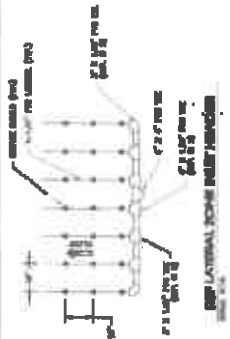






C2.1

Details



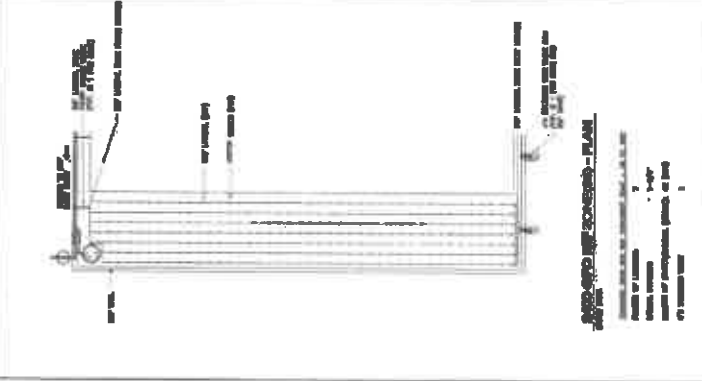
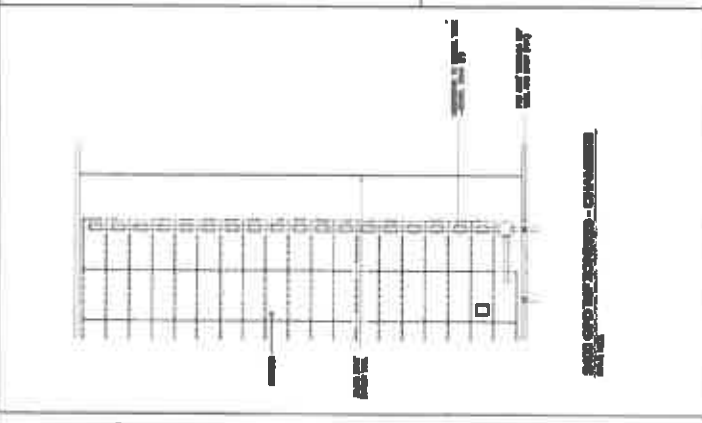
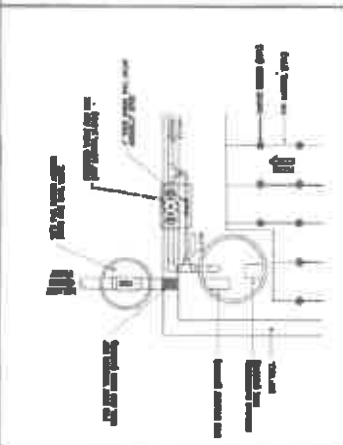
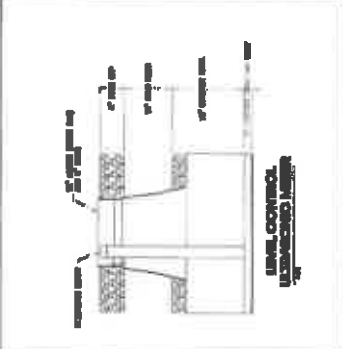
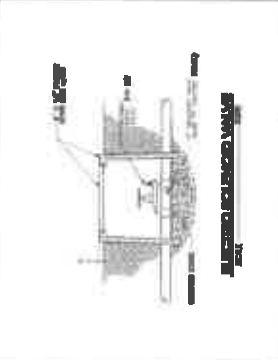
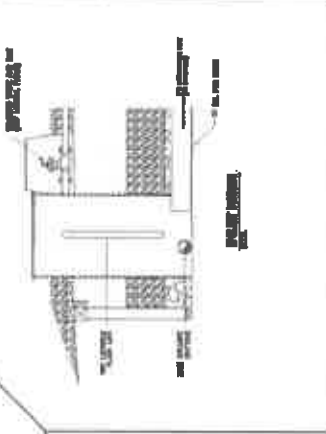
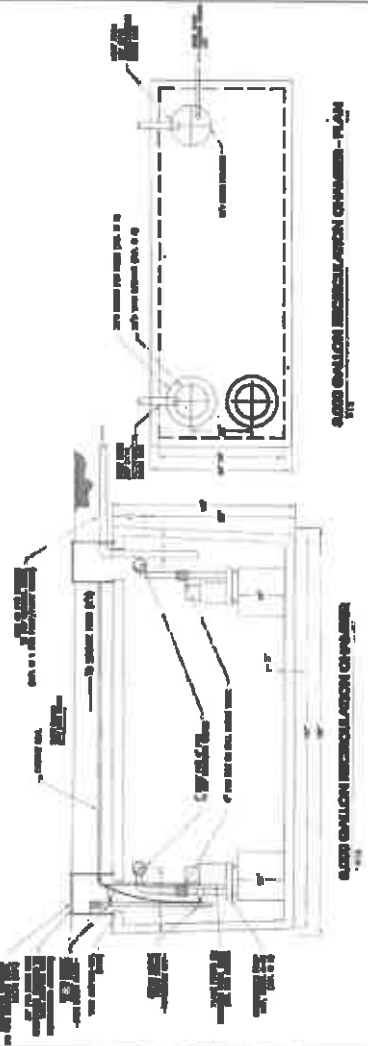
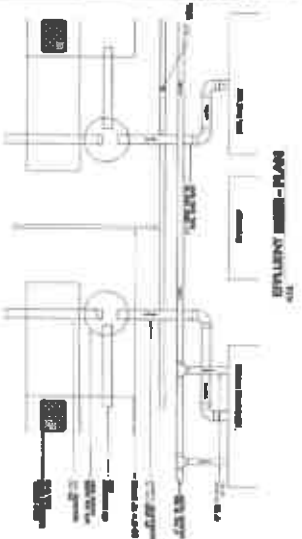
SEKING  
SITE ENGINEERING CONSULTANTS



Hilltop Ridge Treatment Facility

Montgomery County, Baltimore



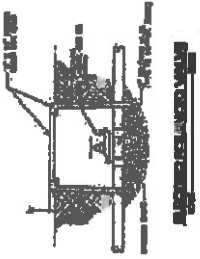




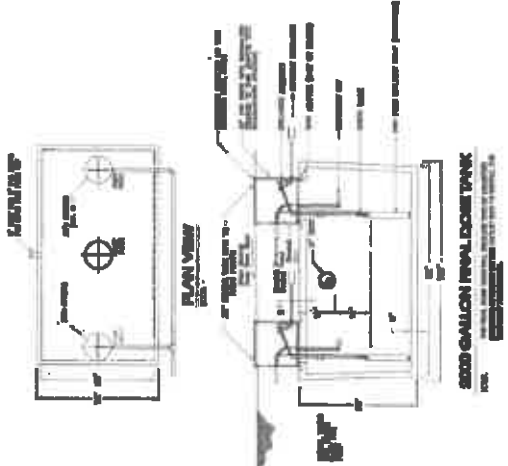
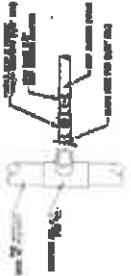
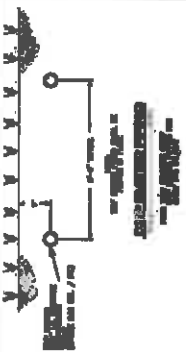
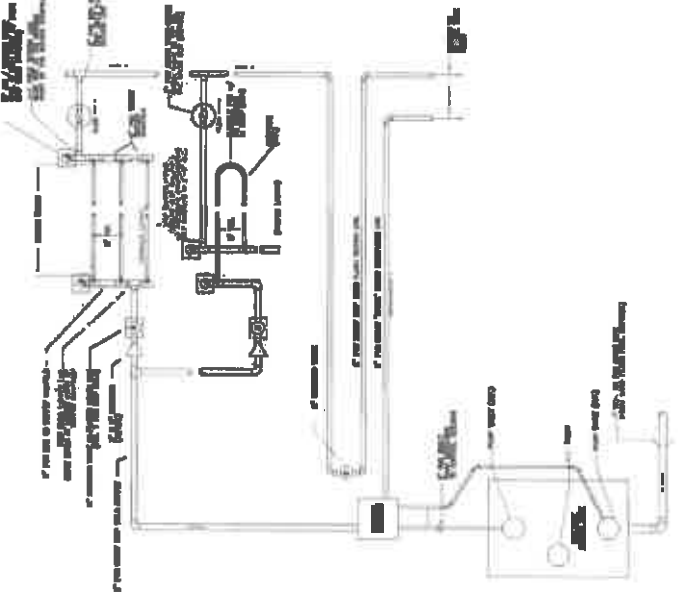
Hilltop Ridge Treatment Facility



**SPC, Inc.**  
 LICENSED PROFESSIONAL ENGINEER  
 STATE OF TENNESSEE  
 LICENSE NO. 25437  
 EXPIRATION DATE 08/2021  
 SPC, Inc. is a member of the SPC Group, which includes SPC Engineering, SPC Construction, and SPC Environmental. SPC, Inc. is not responsible for the actions or omissions of SPC Engineering, SPC Construction, or SPC Environmental.



ELEVATION VIEW OF PROPOSED STRUCTURE





C24

Details

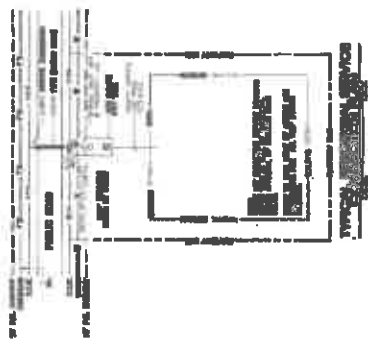
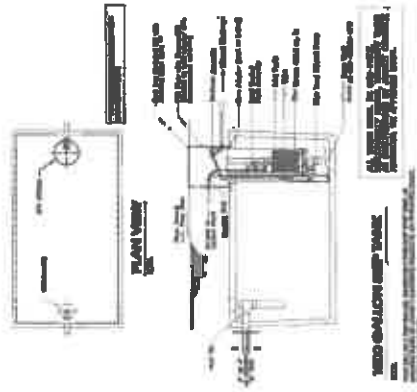
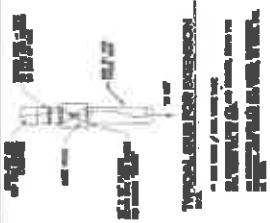
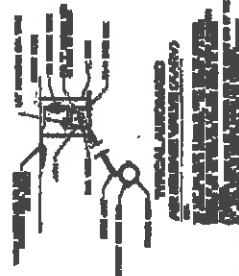
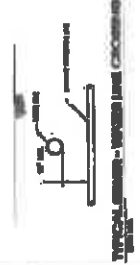
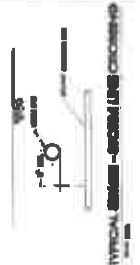
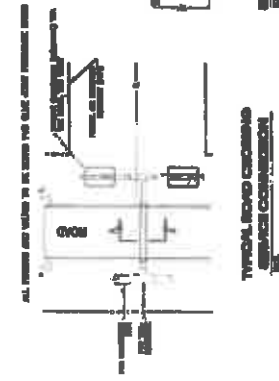
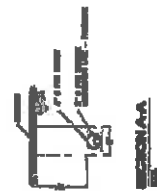
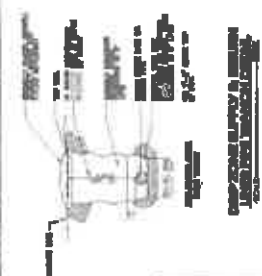
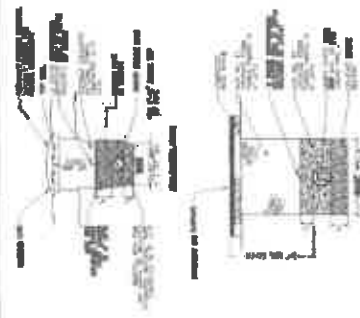
Hilltop Ridge Treatment Facility

Montgomery County, Tennessee



**S.E.C. Inc.**  
 3115 RINGBROOK CONSULTANTS  
 1000 RINGBROOK DRIVE, SUITE 100  
 FARMINGTON, TENNESSEE 37631  
 (615) 895-1100  
 www.secinc.com

**WATER TREATMENT**  
 COLLECTION PITS





SECTION 16, T12N, R10E, S10E, T12N

# Grid Stake Survey

Of a Portion of the

Jason Wilton Property

W River Road, Clarksville,  
Montgomery County, Tennessee 37040



Option for purchase  
of 1/2 acre

1/2 acre  
containing  
approximately  
1.25 acres  
of land

1/2 acre  
containing  
approximately  
1.25 acres  
of land

1/2 acre  
containing  
approximately  
1.25 acres  
of land

1/2 acre  
containing  
approximately  
1.25 acres  
of land

1/2 acre  
containing  
approximately  
1.25 acres  
of land

1/2 acre  
containing  
approximately  
1.25 acres  
of land

ANY CUTTING, FILLING OR  
COMPACTION WILLED  
THIS SOIL MAY



1/2 acre  
containing  
approximately  
1.25 acres  
of land

1/2 acre  
containing  
approximately  
1.25 acres  
of land

1/2 acre  
containing  
approximately  
1.25 acres  
of land

## SURVEYOR'S NOTES

1. The survey was made on the 15th day of May, 2010.
2. The survey was made by Matt Dignity, Registered Land Surveyor, No. 2857, State of Tennessee.
3. The survey was made for the purpose of dividing the land into several tracts.
4. The survey was made for the purpose of dividing the land into several tracts.
5. The survey was made for the purpose of dividing the land into several tracts.
6. The survey was made for the purpose of dividing the land into several tracts.
7. The survey was made for the purpose of dividing the land into several tracts.
8. The survey was made for the purpose of dividing the land into several tracts.
9. The survey was made for the purpose of dividing the land into several tracts.
10. The survey was made for the purpose of dividing the land into several tracts.

## SURVEYOR'S CERTIFICATE

I hereby certify that the survey was made by me or under my direction and supervision, and that the same is a true and correct statement of the facts as shown by the survey.



## Grid Stake Survey

Sheet No. 1 of 1

MATT DIGNITY, RLS  
REGISTERED LAND SURVEYOR  
2857 MOUNTAIN VIEW DR., CLARKSVILLE, TN 37040  
EMAIL: MATT.DIGNITY@MDSURV.COM  
TELEPHONE: (615) 544-0051  
WWW.MDSURV.COM



EX-11/12c

**AFFIDAVIT  
OF  
POWERS AND ATKINS, LLC  
AND  
RIVERLAND PARTNERS,  
A TENNESSEE GENERAL PARTNERSHIP**

WHEREAS, the members, Robert S. Powers and J. Michael Atkins of Powers and Atkins, LLC, (being hereinafter referred to individually as "Member" and collectively as the "Members" and the Partners, Bryce Allen Powers and John Andrew Wyatt, III of Riverland Partners, a Tennessee General Partnership (being hereinafter referred to individually as "Partner" and collectively as the "Partners" do hereby state:

NOW, THEREFORE, BE IT AFFIRMED, the following statements:

1. The above listed Members and Partners of Powers and Atkins, LLC and Riverland Partners are the developers of the proposed Hilltop Ridge.
2. The Developers have engaged Tennessee Waste Water, Inc. to provide sanitary sewer service to the proposed Subdivision.
3. The Developers will convey, fee simple via Warranty Deed, the property/land for the drip fields and the treatment plant associated with the sanitary sewer system to Tennessee Waste Water, Inc. upon the signing of the Final Plat of the Project.
4. Tennessee Waste Water, Inc. will be provided entitlement to the wastewater systems at the signing of the Final Plat of the Project.

Dated this 18<sup>th</sup> day of October, 2021.

  
Powers and Atkins, LLC  
By: Robert S. Powers, Member

  
Riverland Partners, TN GP  
By: Bryce A. Powers, Partner

**STATE OF TENNESSEE  
COUNTY OF MONTGOMERY**

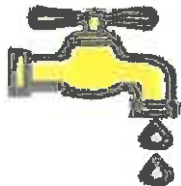
Before me, a Notary Public in and for said County and State, the within named personally appeared ROBERT S. POWERS and BRYCE A. POWERS, with whom I am personally acquainted (or proved to me on the basis of satisfactory evidence), and who, upon oath acknowledged the execution of the within instrument for the purpose contained therein, and who further acknowledge that they are Members and Partners as stated above and are authorized to execute this documents on behalf of Powers and Atkins, LLC and Riverland Partners, a TN GP.

Witness my hand and official seal this the 18<sup>th</sup> day of October, 2021.

My Commission expires: 8-16-22







## CUMBERLAND HEIGHTS UTILITY DISTRICT

925 BRIARWOOD RD.  
CLARKSVILLE, TN 37040

PHONE 931-648-2365  
FAX 931-648-2805

*Cumberland Heights Utility District is an Equal Opportunity Employer and Provider.*

October 14, 2021

**TO: Matthew Nicka, Adenus**

**FROM: Steve Davis, CHUD Manager**

**RE: Availability of Sewer Service for Hilltop Ridge Subdivision**

**Cumberland Heights Utility District provides potable water only. We do not provide public sewer.**

**Please accept this letter as our statement that we are not capable of providing any sewage drainage or treatment to the proposed development referenced above.**

**Steve Davis  
General Mgr.**





## *Montgomery County Government*

**Jim Durrett**  
County Mayor

**1 Millennium Plaza, Suite 205  
P.O. Box 368  
Clarksville, Tennessee 37041-0368**

**Phone: (631) 646-5787  
Fax: (631) 653-5177  
mayordurrett@mcgtn.net**

**October 14, 1021**

**Tennessee Wastewater Systems, Inc.**

**RE: Availability of Sewer Service for Hilltop Ridge Subdivision**

**To Whom It May Concern:**

**Please accept this letter as our statement that Montgomery County Government does not provide sanitary sewer and/or wastewater treatment for any residents of Montgomery County.**

**If you have any questions, please do not hesitate to contact me.**

**Sincerely,**

A handwritten signature in black ink, appearing to read "Jim Durrett", with a stylized flourish at the end.

**Jim Durrett  
Montgomery County Mayor**



**Confidential Exhibit 14A**



**Confidential Exhibit 14B**



**Tennessee Wastewater System, Inc.,  
Officer and Key Employee Biographies**

Tennessee Wastewater Systems, Inc. ("TWSI") is a leader in decentralized wastewater systems and technology in the Southeastern United States. TWSI has been a regulated provider of wastewater services in Tennessee since receiving its initial CCN from the Tennessee Public Service Commission, the predecessor to the current Tennessee Public Utility Commission, in 1994; currently holding over 100 certificates for territories in Middle and East Tennessee and providing service to over 3000 customers across the State.

**Jeff Ridsen, CEO** – Mr. Ridsen joined Adenus in 2015 as General Counsel before rising to CEO in late 2018. Prior to Adenus Mr. Ridsen was in private legal practice and spent over twenty years in the music business as a booking agent and artist manager, representing and guiding the careers of gold and platinum selling, and Grammy nominated musical artists, songwriters, and producers. He received his undergraduate degree from Geneva College in Beaver Falls, PA, and his JD from the Nashville School of Law.

**Matthew Nicks – President** – Mr. Nicks is the President of Tennessee Wastewater Systems, Inc. Mr. Nicks comes from an environmental remediation background. Mr. Nicks has worked all over the world handling and overseeing the collection, treatment, storage, transportation, and shipping of hazardous waste in a variety of industry settings. Matthew has a strong background in regulatory compliance matters including those related to OSHA, NIOSH, ANSI, NFPA, and the EPA. Mr. Nicks is also a residential developer who has developed properties in Davidson County. Mr. Nicks is a Tennessee licensed contractor.

**Tom Pickney – Secretary**

**Bill Pickney – Treasurer**

Tom and Bill Pickney entered the wastewater business in the mid 1980's by constructing low pressure pipe systems for homes, primarily in Williamson County. They were shortly joined by their brother Bob who through his engineering background added system design to their offerings. Soon Pickney Brothers, Inc. was formed and over the coming years helped bring the decentralized wastewater concept to Tennessee. Tom and Bill, along with their brothers Bob and Charles formed On-Site Systems, Inc. in early 1990's. The company was granted its first CCN in 1994. On-Site's name was changed in 2007 to Tennessee Wastewater Systems, Inc. Tom and Bill have extensive, decades long, experience and knowledge of the design, construction, and operations of decentralized wastewater systems.



EX. 18



STATE OF TENNESSEE  
DEPARTMENT OF  
COMMERCE AND INSURANCE



377599

ADENUS SOLUTIONS GROUP LLC.

ID NUMBER: 58778  
LIC STATUS: ACTIVE  
EXPIRATION DATE: March 31, 2023

BOARD FOR LICENSING CONTRACTORS  
CONTRACTOR

THIS IS TO CERTIFY THAT ALL REQUIREMENTS  
OF THE STATE OF TENNESSEE HAVE BEEN MET

ADENUS SOLUTIONS GROUP LLC.  
849 AVIATION PARKWAY  
SMYRNA, TN 37167

# State of Tennessee

377599

BOARD FOR LICENSING CONTRACTORS  
CONTRACTOR  
ADENUS SOLUTIONS GROUP LLC.

*This is to certify that all requirements of the State of Tennessee have been met.*

ID NUMBER: 58778  
LIC STATUS: ACTIVE  
EXPIRATION DATE: March 31, 2023  
\$812,630.00; BC-B; BC-C; MU; MU-A; MU-C; MU-D



IN-1313  
DEPARTMENT OF  
COMMERCE AND INSURANCE



**BOARD FOR LICENSING CONTRACTORS**

**AREAS OF CERTIFICATION/MONEY LIMITS**

**\$812,630.00; BC-B; BC-C; MU; MU-A; MU-C; MU-D**





## STATE OPERATING PERMIT APPLICATION SOP

**Hilltop Ridge Treatment Facility  
Recirculating Media Filter & Drip Dispersal  
2110 River Road**

**Tennessee Wastewater Systems Inc.  
Montgomery County, TN**





## Table of Contents

<u>Section</u>	<u>Title</u>
----------------	--------------

1.0	SOP Permit Application
2.0	Area of Review
3.0	Ground Water General Description
4.0	Population General Description
5.0	Nature of Fluid
6.0	General Location of Publicly Supplied Water
7.0	Description of System
8.0	Nature and Type of System
9.0	Flow Schematic



## 1.0 SOP Permit Application





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  
(615) 532-0625

**APPLICATION FOR A STATE OPERATION PERMIT (SOP)**

Type of application: ☒ New Permit ☐ Permit Reissuance ☐ Permit Modification

**Permittee Identification:** (Name of city, town, industry, corporation, individual, etc., applying, according to the provisions of Tennessee Code Annotated Section 69-3-108 and Regulations of the Tennessee Water Quality Control Board.)

Permittee

Name **Tennessee Wastewater Systems, Inc.**  
(applicant):

Permittee  
Address: **851 Aviation Parkway, Smyrna, TN 37167**

Official Contact:

**Jeff RIsden**

Title or Position:

**CEO**

Mailing Address:

**851 Aviation Parkway**

City:

**Smyrna**

State:

**TN**

Zip:

**37167**

Phone number(s):

**615-220-7200**

E-mail:

**jeff.rIsden@adenus.com**

Optional Contact:

**Billy Dranes**

Title or Position:

**Operations Manager**

Address:

**849 Aviation Parkway**

City:

**Smyrna**

State:

**TN**

Zip:

**37167**

Phone number(s):

**615-220-7180**

E-mail:

**billy.dranes@adenus.com**

**Application Certification** (must be signed in accordance with the requirements of Rule 0400-40-05-.05)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. As specified in Tennessee Code Annotated Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

Name and title; print or type

**Jeff RIsden, CEO**

Signature

Date

**1/31/2022**



<b>Facility Identification:</b>		<b>Existing Permit No.</b>	
Facility Name:	<b>Hilltop Ridge Treatment Facility</b>	County:	<b>Montgomery</b>
Facility Address or Location:	<b>Grizzlly Drive, Clarksville, TN</b>	Latitude:	<b>36.4634</b>
		Longitude:	<b>-87.3894</b>
Name and distance to nearest receiving waters: <b>West to Antioch Creek ultimately to Cumberland River</b>			
If any other State or Federal Water/Wastewater Permits have been obtained for this site, list their permit numbers: <b>N/A</b>			
Name of company or governmental entity that will operate the permitted system: <b>Tennessee Wastewater Systems, Inc.</b>			
Operator address: <b>849 Aviation Parkway, Smyrna, TN 37167</b>			
Has the owner/operator filed for a Certificate of Convenience & Necessity (CCN), or an amended CCN, with the Tennessee Regulatory Authority (TRA) (may be required for collection systems and land application treatment systems)? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A			
If the applicant listed above does not yet own the facility/site or if the applicant will not be the operator, explain how and when the ownership will be transferred or describe the contractual arrangement and renewal terms of the contract for operations. <b>N/A</b>			
<b>Complete the following information explaining the entity type, number of design units, and daily design wastewater flow:</b>			
<u>Entity Type</u>	<u>Number of Design Units</u>		<u>Flow (gpd)</u>
<input checked="" type="checkbox"/> City, town or county	No. of connections: <b>68</b>	<b>Typical Residential/Commercial Sanitary Sewer</b>	<b>20,400</b>
<input type="checkbox"/> Subdivision	No. of homes:	Avg. No. bedrooms per home:	
<input type="checkbox"/> School	No. of students:	Size of cafeteria(s): No. of showers:	
<input type="checkbox"/> Apartment	No. of units:	No. units with Washer/Dryer hookups: No. units without W/D hookups:	
<input type="checkbox"/> Commercial Business	No. of employees:	Type of business:	
<input type="checkbox"/> Industry	No. of employees:	Product(s) manufactured:	
<input type="checkbox"/> Resort	No. of units:		
<input type="checkbox"/> Camp	No. of hookups:		
<input type="checkbox"/> RV Park	No. of hookups:	No. of dump stations:	
<input type="checkbox"/> Car Wash	No. of bays:		
<input type="checkbox"/> Other			
Describe the type and frequency of activities that result in wastewater generation. <b>Regional Treatment Facility - Typical Residential Sanitary Sewer</b>			



**Engineering Report (required for collection systems and/or land application treatment systems):**☐ N/A☐ Prepared in accordance with Rule 0400-40-05-.03 and Section 1.2 of the State of Tennessee [Design Criteria for Sewage Works](#)☒ Attached, or☐ Previously submitted and entitled:Approved? ☐ Yes. Date:☐ No

Operation and Maintenance Inspection Schedule Submitted:

Approved? ☐ Yes. Date:☐ No**Wastewater Collection System:**☐ N/A

System type (i.e., gravity, low pressure, vacuum, combination, etc.): Septic tank effluent with small diameter gravity/pressure collection

System Description: SDR 17 PVC pressure pipe ranging from 3"Ø to 4"Ø and required fittings

Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): Cellular Telemetry Notification

In the event of a system failure describe means of operator notification: Cellular Telemetry Notification

List the **emergency** contact(s) (name/phone): Billy Dranes - 615-220-7200

For low-pressure systems, who is responsible for maintenance of STEP/STEG tanks and pumps or grinder pumps (list all contact information)? Tennessee Wastewater Systems, Inc.

Approximate length of sewer (excluding private service lateral): As required

Number/hp of lift stations: As required/0.5 HP Number/hp of lift pumps /

Number/volume of low pressure and or grinder pump tanks /

Number/volume septic tanks as needed/varies

Attach a schematic of the collection system. ☒ Attached

If this is a satellite sewer and you are tying into another sewer system complete the following section, listing tie-in points to the sewer system and their location (attach additional sheets as necessary):

Tie-in Point

Latitude (xx.xxxx°)

Longitude (xx.xxxx°)

N/A



<b>Land Application Treatment System:</b>	<input type="checkbox"/> N/A
Type of Land Application Treatment System: <input checked="" type="checkbox"/> Drip <input type="checkbox"/> Spray <input type="checkbox"/> Other, explain:	
Type of treatment facility preceding land application (recirculating media filters, lagoons, other, etc.): Recirculating Media Filter	
Attach a treatment schematic. <input checked="" type="checkbox"/> Attached	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.): Cellular Telemetry Notification	
For New or Modified Projects:	
Name of Developer for the project: Powers & Atkins Llc Riverland Partners	
Developer address and phone number: 46 Union St, Clarksville, TN 37040	
For land application, list: Proposed acreage involved: 3.5± Acres	
Inches/week gpd/sq.ft loading rate to be applied: 0.2 GPD/SF	
Is wastewater disinfection proposed?	
<input type="checkbox"/> Yes Describe land application area access:	
<input checked="" type="checkbox"/> No Describe how access to the land application area will be restricted: Fence	
<b>Attach required additional Engineering Report Information (see <a href="#">website</a> for more information)</b>	
<input checked="" type="checkbox"/> Topographic map (1:24,000 scale presented at a six inch by six-inch minimum size) showing the location of the project including quadrangle(s) name(s) GPS coordinates, and latitude and longitude in decimal degrees should also be included.	
<input checked="" type="checkbox"/> Scaled layout of facility showing the following: lots, buildings, etc. being served, the wastewater collection system routes, the pretreatment system location, the proposed land application area(s), roads, property boundaries, and sensitive areas such as streams, lakes, springs, wells, wellhead protection areas, sinkholes and wetlands.	
<input checked="" type="checkbox"/> Soils information for the proposed land disposal area in the form of a Water Resources Soils Map per Chapter 16 and 17 State of Tennessee Design Criteria for Sewage Work. The soils information should include soil depth (borings to a minimum of 4 feet or refusal) and soil profile description for each soil mapped.	
<input checked="" type="checkbox"/> Topographic map of the area where the wastewater is to be land applied with no greater than ten-foot contours presented at a minimum size of 24 inches by 24 inches.	
<input type="checkbox"/> Describe alternative application methods based on the following priority rating: (1) connection to a municipal/public sewer system, (2) connection to a conventional subsurface disposal system as regulated by the Division of Groundwater Protection, and/or (3) land application.	



<b>For Drip Dispersal Systems Only: Unless otherwise determined by the Department, sewage treatment effluent wells, i.e, large capacity treatment/drip dispersal systems after approval of the SOP Application, will be issued an UIC tracking number and will be authorized as Permit by Rule per UIC Rule 0400-45-06-.14(2) and upon issue of a State Operating Permit and Sewage System Construction Approval by the Department. Describe the following:</b>	<input checked="" type="checkbox"/> N/A
The area of review (AOR) for each Drip Dispersal System shall, unless otherwise specified by the Department, consist of the area lying within a one-mile radius or an area defined by using calculations under 0400-45-06-.09 of the Drip Dispersal System site or facility, and shall include, but not be limited to general surface geographic features, general subsurface geology, and general demographic and cultural features within the area. Attach to this part of the application a general characterization of the AOR, including the following: (This can be in narrative form)	
<input type="checkbox"/> A general description of all past and present groundwater uses as well as the general groundwater flow direction and general water quality.	
<input type="checkbox"/> A general description of the population and cultural development within the AOR (i.e. agricultural, commercial, residential or mixed)	
<input type="checkbox"/> Nature of injected fluid to include physical, chemical, biological or radiological characteristics.	
<input type="checkbox"/> If groundwater is used for drinking water within the area of review, then identify and locate on a topographic map all groundwater withdrawal points within the AOR, which supply public or private drinking water systems. Or supply map showing general location of publicly supplied water for the area (this can be obtained from the water provider)	
<input type="checkbox"/> If the proposed system is located within a wellhead protection area or source water protection area designated by Rule 0400-45-01-.34, show the boundary of the protection area on the facility site plan.	
<input type="checkbox"/> Description of system, Volume of injected fluid in gallons per day based upon design flow, including any monitoring wells	
<input type="checkbox"/> Nature and type of system, including installed dimensions of wells and construction materials	

<b>Pump and Haul:</b>	<input checked="" type="checkbox"/> N/A
Reason system cannot be served by public sewer:	
Distance to the nearest manhole where public sewer service is available:	
When sewer service will be available:	
Volume of holding tank:                      gal.	
Tennessee licensed septage hauler (attach copy of agreement):	
Facility accepting the septage (attach copy of acceptance letter):	
Latitude and Longitude (in decimal degrees) of approved manhole for discharge of septage:	
Describe methods to prevent and respond to any bypass of treatment or discharges (i.e., power failures, equipment failures, heavy rains, etc.):	



<b>Holding Ponds (for non-domestic wastewater only):</b>	<input checked="" type="checkbox"/> N/A
Pond use: <input type="checkbox"/> Recirculation <input type="checkbox"/> Sedimentation <input type="checkbox"/> Cooling <input type="checkbox"/> Other (describe):	
Describe pond use and operation:	
If the pond(s) are existing pond(s), what was the previous use?	
Have you prepared a plan to dispose of rainfall in excess of evaporation? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If so, describe disposal plan:	
Is the pond ever dewatered? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If so, describe the purpose for dewatering and procedures for disposal of wastewater and/or sludge:	
Is(are) the pond(s) aerated? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Volume of pond(s): _____ gal. Dimensions: _____	
Is the pond lined (Note if this is a new pond system it must be lined for SOP coverage. Otherwise, you must apply for an Underground Injection Control permit.)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Describe the liner material (if soil liner is used give the compaction specifications):	
Is there an emergency overflow structure? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If so, provide a design drawing of structure.</i>	
Are monitoring wells or lysimeters installed near or around the pond(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
<i>If so, provide location information and describe monitoring protocols (attach additional sheets as necessary):</i>	



<b>Mobile Wash Operations:</b>		<input checked="" type="checkbox"/> N/A
<input type="checkbox"/> Individual Operator <input type="checkbox"/> Fleet Operation Operator		
<b>Indicate the type of equipment, vehicle, or structure to be washed during normal operations (check all that apply):</b>		
<input type="checkbox"/> Cars <input type="checkbox"/> Trucks <input type="checkbox"/> Trailers (Interior washing of dump-trailers, or tanks, is prohibited.) <input type="checkbox"/> Other (describe):	<input type="checkbox"/> Parking Lot(s):      sq. ft. <input type="checkbox"/> Windows:      sq. ft. <input type="checkbox"/> Structures (describe):	
<b>Wash operations take place at (check all that apply):</b>		
<input type="checkbox"/> Car sales lot(s) <input type="checkbox"/> Private industry lot(s) <input type="checkbox"/> County(ies), list:	<input type="checkbox"/> Public parking lot(s) <input type="checkbox"/> Private property(ies) <input type="checkbox"/> Statewide	
<b>Wash equipment description:</b>		
<input type="checkbox"/> Truck mounted <input type="checkbox"/> Rinse tank size(s) (gal.): <input type="checkbox"/> Collection tank size(s) (gal.):	<input type="checkbox"/> Trailer mounted <input type="checkbox"/> Mixed tanks size(s) (gal.): Number of tanks per vehicle:	
Pressure washer:      psi (rated)      gpm (rated) <input type="checkbox"/> gas powered <input type="checkbox"/> electric		
Vacuum system manufacturer/model:      Vacuum system capacity:      inches Hg		
Describe any other method or system used to contain and collect wastewater:		
List the public sewer system where you are permitted or have written permission to discharge waste wash water (include a copy of the permit or permission letter):		
Are chemicals pre-mixed, prior to arriving at wash location? <input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Describe all soaps, detergents, or other chemicals used in the wash operation (attach additional sheets as necessary):</b>		
Chemical name:	Manufacturer:	Primary CAS No. or Product No.



**APPLICATION FOR A STATE OPERATION PERMIT (SOP)**  
**INSTRUCTIONS**

**Purpose of this form** A completed SOP application must be submitted to obtain SOP coverage. This permit is required to operate a sewage, industrial waste or other waste collection and/or treatment system that does not have a point source discharge to any surface or subsurface waters. This form must be submitted at least 180 days before starting any new activity, before an existing permit expires, or when renewing a permit.

**Complete the form** Type or print clearly, using black or blue ink; not markers or pencil. Answer each item or enter "N/A," for not applicable. If you need additional space, attach a separate piece of paper to the SOP application. Applicants may be required to submit engineering reports, plans and specifications. Contact the division for the applicable items, or refer to Appendix 1-D of the state [Design Criteria for Sewage Works](#) for more information. **The application will be considered incomplete without supplying all of the required information, Engineering Reports, and an original signature.**

**Permittee Identification/Facility Identification** Describe and locate the project, use the legal or official name of the facility or site. Provide the latitude and longitude (expressed in decimal degrees) of the center of the site, which can be located on USGS quadrangle maps. The quadrangle maps can be obtained at 1-800-USA-MAPS, or at the Census Bureau world wide web site: <http://www.census.gov/cgi-bin/gazetteer>. Attach a copy of a portion of a 7.5-minute quad map, showing location of site, with boundaries at least one mile outside the site boundaries. If business is mobile give the owner of operations' home, or business office address, and list all current areas of operation by city and county.

**Wastewater Collection System** These types of systems require engineering reports, refer to Appendix 1-D of the state [Design Criteria for Sewage Works](#) for more information.

**Land Application Treatment System** These types of systems require engineering reports, refer to Appendix 1-D of the state [Design Criteria for Sewage Works](#) for more information. Public access to the treatment area must be restricted, if disinfection is not part of the treatment. Applicants completing this section of the application must also complete the Wastewater Collection System section.

**Pump and Haul** These types of systems may require engineering reports, refer to Appendix 1-D of the state [Design Criteria for Sewage Works](#) for more information.

**Holding Ponds** Given that annual rainfall onto open ponds exceeds annual evaporation (in Tennessee), the permittee must develop a written plan (to be retained on site and be available to the division upon request) that addresses how excess rainfall will be disposed of in compliance with the no discharge requirement of this permit. Treatment ponds are not to be used for stormwater treatment or storage. All new and existing point source industrial stormwater discharges associated with industrial activity require coverage under the



**APPLICATION FOR A STATE OPERATION PERMIT (SOP)**  
**INSTRUCTIONS - CONTINUED**

Tennessee industrial stormwater multi-sector general permit TMSP, refer to the [website](#) for more information. Describe the system for re-routing surface runoff away from ponds in the rainfall disposal plan.

**Mobile Wash Operations** Indicate whether the operation is run by an individual or a corporation with a fleet of vehicles equipped to wash and collect waste waters. If a corporation, indicate the home office as the "Official Contact". Indicate if operations take place at specific sites and list those counties that apply. Note that this permit covers operations for all of Tennessee. Operations indicated as "statewide" generally apply as a fleet type operation and each office location shall be individually permitted. Equipment may be truck or trailer-mounted, or both, indicate all that applies. Soaps, detergents, and other chemicals used should be non-toxic and biodegradable. All "chemically enhanced" (soaps, detergents, and other chemicals) waste-wash waters must be collected for proper disposal. If no chemically enhanced washwaters are used, clear-wash waters may travel by sheet flow to a gravel or grassy area where there is no opportunity to enter waters of the state. There should be no discharge to a storm water inlet, ditch, conveyance, stream, etc. If you are unsure of your wash area drainage, contact the area Environmental Field Office (EFO) prior to setting up your wash operation.

**Fees** Refer to the TDEC-DWR Environmental Protection Fund Fee Rule 0400-40-11-.02. Links to publications are available on Department of Environment and Conservation, Division of Water Resources webpage and the webpage for the Tennessee Secretary of State.

**Submitting the form and obtaining more information** Note that this form must be signed by the chief executive officer, owner, or highest-ranking elected official. For more information, contact your local EFO at the toll-free number 1-888-891-8332 (TDEC). Submit a complete application electronically to [water.permits@tn.gov](mailto:water.permits@tn.gov) (preferred) or to the appropriate EFO for the county(ies) where the facility is located, addressed to **Attention: DWR, Permit Section**. Please keep a copy for your records.

EFO	Street Address	Zip Code	EFO	Street Address	Zip Code
Memphis	8383 Wolf Lake Drive, Barlett	38133	Cookeville	1221 South Willow Ave.	38506
Jackson	1625 Hollywood Dr	38305-4316	Chattanooga	1301 Riverfront Parkway Suite 206	37402
Nashville	711 R S Gass Boulevard	37243	Knoxville	3711 Middlebrook Pike	37921
Columbia	1421 Hampshire Pike	38401	Johnson City	2305 Silverdale Road	37601



**APPLICATION FOR A STATE OPERATION PERMIT (SOP)**  
**INSTRUCTIONS - CONTINUED**

Upon receipt of the required items, the division conducts a review of the material, and the applicant is notified of any deficiencies. When all the deficiencies have been corrected, the division makes a determination of whether to publish a draft permit. When a draft permit is generated, a public notice is issued and published in a local newspaper. The draft permit is then reviewed by the applicant, and division field staff. The general public also has an opportunity to review the permit. Based on public response, a public hearing may be held. After considering public comments and a final review, the permit may be issued. The entire process normally takes from five (5) to nine (9) months. Permits are normally valid for five (5) years, except those for pump and haul systems, which are generally valid for one (1) year.

The division has the right to inspect a facility when deemed necessary. In addition, the division has the right to revoke or suspend any permit for violation of permit conditions or any other provisions of the Tennessee Water Quality Control Act and other water pollution control rules.

The division is responsible for regulating any activity, which involves a potential discharge in order to protect waters of the State from pollution and to maintain the highest possible standards in water quality.







## 2.0 Area of Review





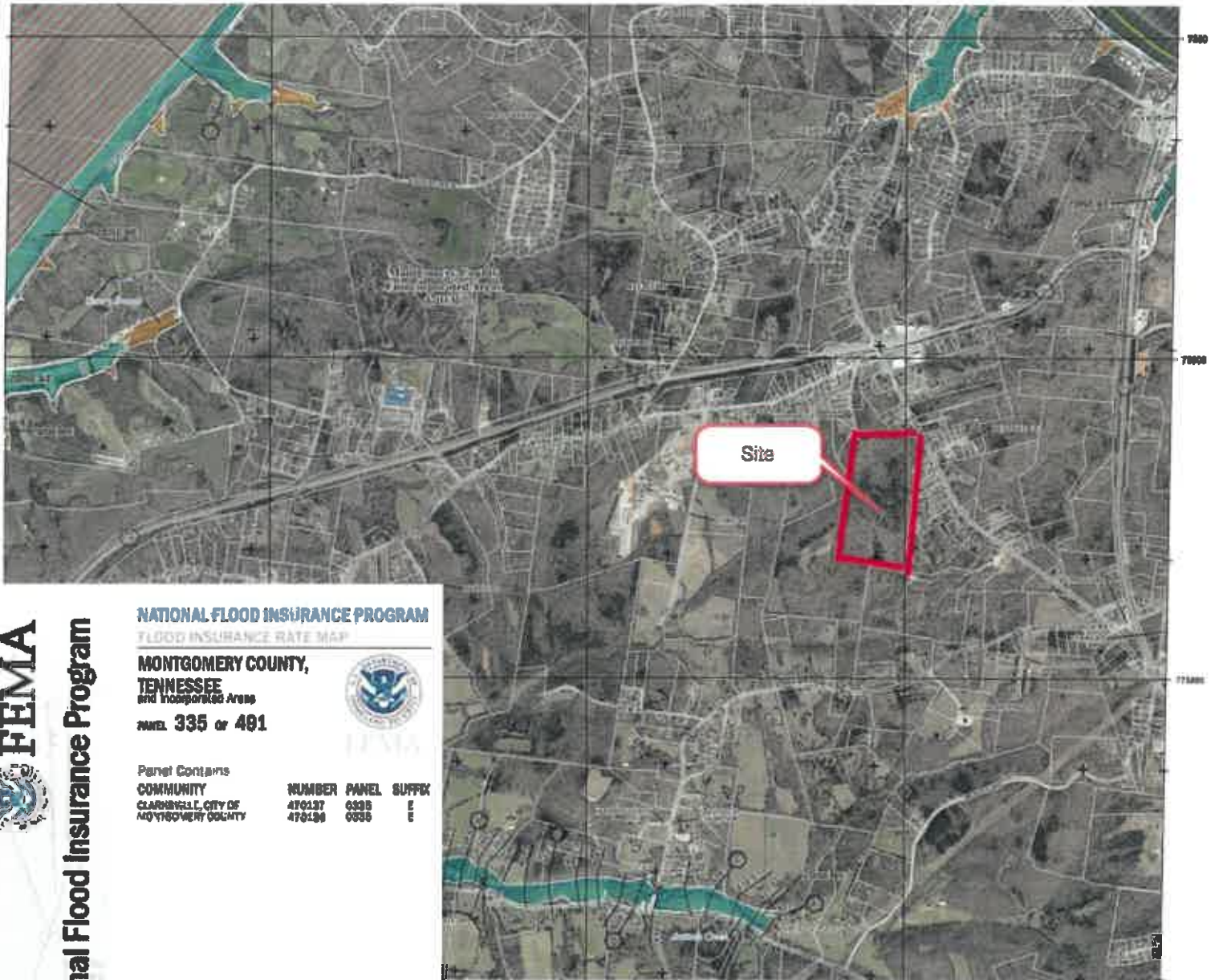




## Montgomery County Topo Map

SEC Project No. 21506





# National Flood Insurance Program

## NATIONAL FLOOD INSURANCE PROGRAM FLOOD INSURANCE RATE MAP

**MONTGOMERY COUNTY,  
TENNESSEE**  
and Incorporated Areas

**PANEL 335 of 481**



Panel Contains

**COMMUNITY**  
CLARKSVILLE CITY OF  
MONTGOMERY COUNTY

NUMBER	PANEL	SUFFIX
470137	0335	E
470138	0335	E

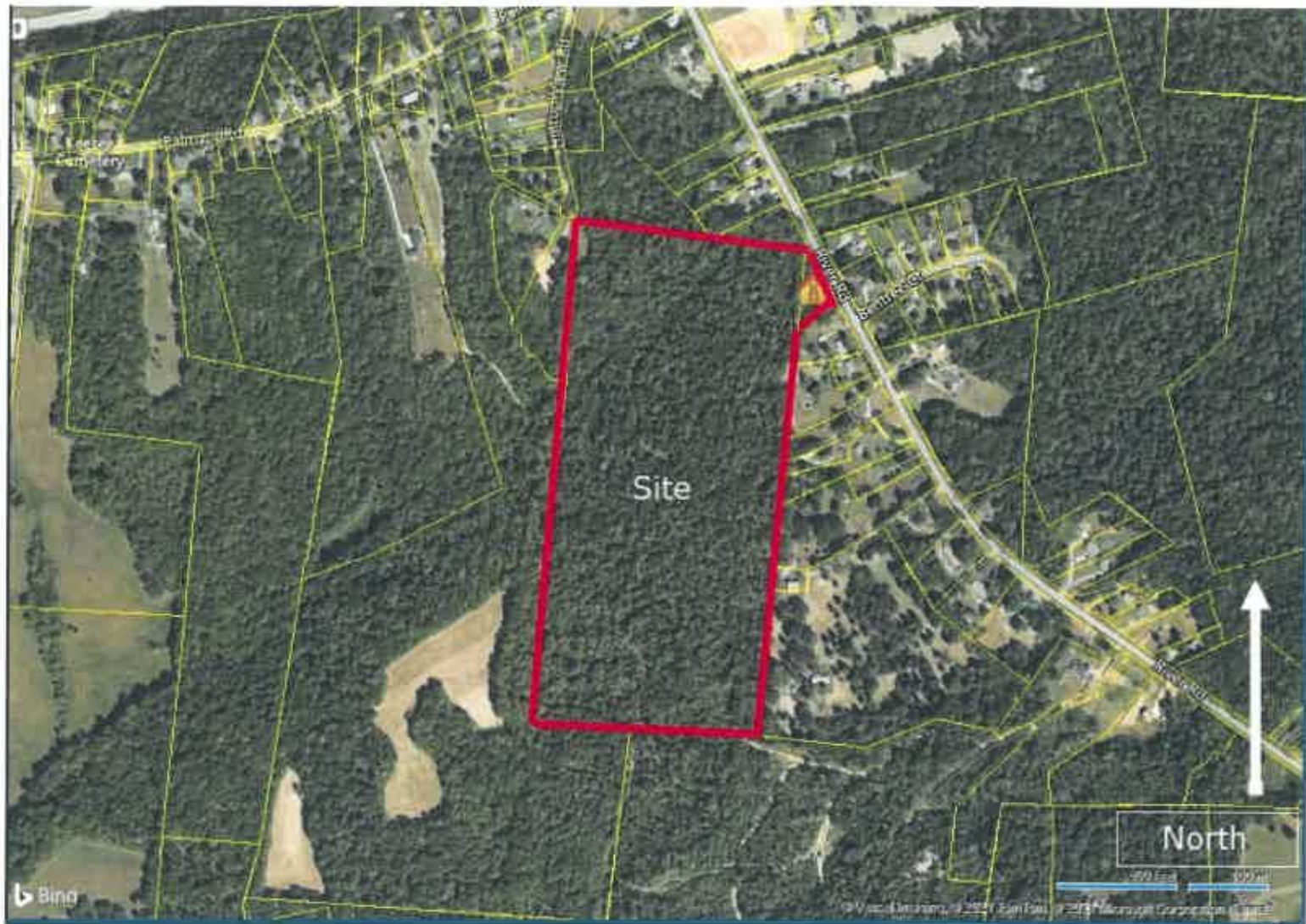
**VERSION NUMBER**  
**2.4.3.0**

**MAP NUMBER**  
**47125C0335E**

**MAP REVISED**  
**JANUARY 15, 2021**

## FEMA MAP 100-Year Floodplain





**Aerial Map**



### **3.0 Groundwater General Description**

The attached USGS maps indicate the Hilltop Ridge Drip Dispersal Expansion area drainage flow path is to the south and west to Antioch Creek and ultimately discharging Cumberland River watershed. See attached maps.

### **4.0 Population General Description**

The majority of the Area of Review is agricultural land used primarily for pasture and large lot residential. Sparse residential subdivisions have been developed but remain spread out due to the lack of wastewater service. See attached aerial map of property.

### **5.0 Nature of Fluid**

Hilltop Ridge TF will be designed to accommodate typical residential sanitary wastewater effluent after primary treatment has been accomplished by the interceptor tank(s) at the source.

Hilltop Ridge TF Drip Dispersal will have a peak design discharge of approximately 20,400 gpd.



## **6.0 General Location of Publicly Supplied Water**

**East Montgomery Utility District supplies public drinking water within the AOR.**

**East Montgomery Utility District  
5195 Highway 41-A South Clarksville, TN 37043  
East Montgomery Utility District Information 931-368-1921**







## 7.0 Description of System

Treated wastewater approximately 20,400 gpd is pumped and distributed to HDPE drip lines with pressure compensating emitters. The drip lines are to be installed on 5-foot centers along the contours with the emitters spaced at 2-foot centers along the drip lines. Drip lines are plowed into the soils that have been approved by a certified soil scientist and placed at an approximate depth of 7-8 inches below the ground surface. Distribution of the treated wastewater is managed through solenoid valves and controlled by a programmable PLC.

### Daily Flow

Number of Buildable Residential Lots	68.0 lots
Daily Flow for 3-BR	300 gpd/lot
Design Daily Flow	20,400 gpd

### Land Application Area

Land Application Area	0.2 gal/sf/day*
Total Area Required	102000 s.f.
or	2.34 acres

\* assumed soil absorption rate

### Number of Required Zones

Length per zone (@ 5' o.c.)	3400 L.F.
Number of Zones	6.0 Zones
Total Length	20400 L.F.

### Land Reserve Area

Area per lot	50% S.F./lot
Total Area Required	51000 acres
or	1.17 acres
Total Area Required	153000 s.f.
Total Area Required	3.51 s.f.

### Sand Filter Size

5 gal/S.F./day	
20,400 gpd	
Area Req'd	4080 S.F.
Use Filter No.	55' x 80'



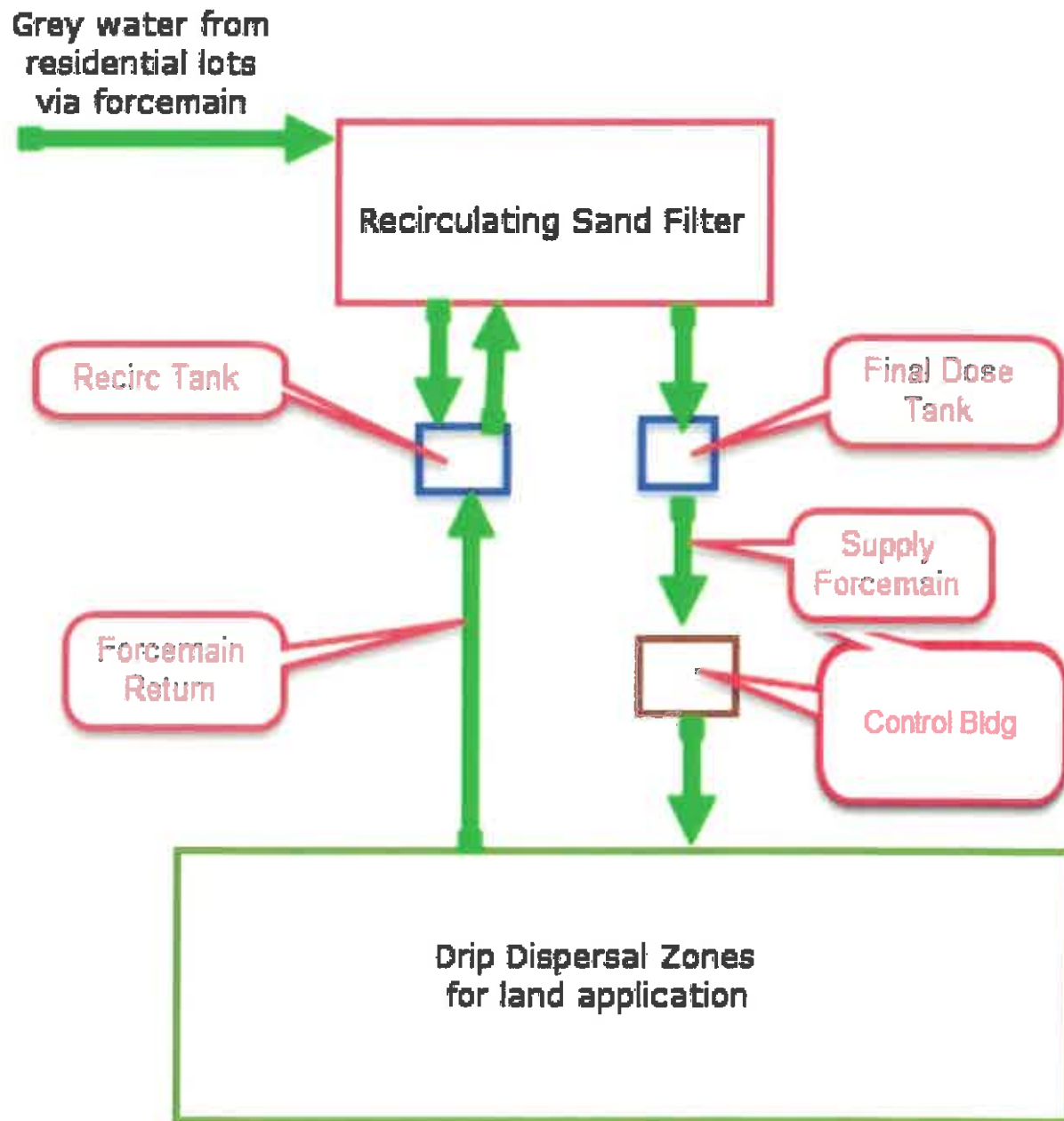
## 8.0 Nature and Type of System

The Hilltop Ridge TF designed for 20,400 GPD wastewater treatment capacity. A Recirculating Media Filter (RMF) (80'x55') will be added as the primary treatment.

***Disposal Capacity:*** This application is proposing to allow for drip disposal soils for land application for approximately 20,400 LF of drip disposal lines (6 zones at 3,400 LF per zone)



## 9.0 Flow Schematic







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

May 2, 2022

Mr. Jeff Ridsen  
Chief Executive Officer  
Tennessee Wastewater Systems, Inc.  
e-copy: jeff.ridsen@adenus.com  
849 Aviation Pkwy  
Smyrna, TN 37167

Subject: **Draft of State Operating Permit No. SOP-22004**  
**Tennessee Wastewater Systems, Inc.**  
**Hilltop Ridge**  
**Clarksville, Montgomery County, Tennessee**

Dear Mr. Ridsen:

Enclosed please find one copy of the draft state operating permit, which the Division of Water Resources (the division) proposes to issue. The issuance of this permit is contingent upon your meeting all of the requirements of the Tennessee Water Quality Control Act and the rules and regulations of the Tennessee Water Quality, Oil and Gas Board.

If you disagree with the provisions and requirements contained in the draft permit, you have thirty (30) days from the date of this correspondence to notify the division of your objections. If your objections cannot be resolved, you may appeal the issuance of this permit. This appeal should be filed in accordance with Section 69-3-110, Tennessee Code Annotated.

If you have questions, please contact the Nashville Environmental Field Office at 1-888-891-TDEC; or, at this office, please contact Mr. Bryan Pope at (931) 224-3098 or by E-mail at [Bryan.Pope@tn.gov](mailto:Bryan.Pope@tn.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Brad Harris".

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

Enclosure

cc: Permit File  
Nashville Environmental Field Office



**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**

**Permit No. SOP-22004**

**PERMIT**

**For the operation of Wastewater Treatment Facilities**

---

In accordance with the provision of Tennessee Code Annotated section 69-3-108 and Regulations promulgated pursuant thereto:

**PERMISSION IS HEREBY GRANTED TO**

Tennessee Wastewater Systems, Inc.  
Hilltop Ridge  
Clarksville, Montgomery County, Tennessee

**FOR THE OPERATION OF**

system located at latitude 36.46163 and longitude -87.39153 in Montgomery County, Tennessee to serve approximately 68 homes by the Hilltop Ridge Treatment Facility. The design capacity of the system is .0204 MGD and will be dispersed on approximately 3.5 acres of suitable soils.

This permit is issued as a result of the application filed on February 1, 2022, in the office of the Tennessee Division of Water Resources. This permit is contingent on the submission and department approval of construction plans, specifications and other data in accordance with rules of the department. Updated plans and specifications must be approved before any further construction activity.

**This permit shall become effective on:**

**This permit shall expire on:**

**Issuance date:**

---

for Jennifer Dodd  
Director



**A. GENERAL REQUIREMENTS**

The treatment system shall be monitored by the permittee as specified below:

<u>Parameter</u>	<u>Sample Type</u>	<u>Daily Maximum</u>	<u>Monthly Average</u>	<u>Measurement Frequency</u>
Flow *	Totalizer			Daily
BOD <sub>5</sub>	Grab	45 mg/l	N/A	Once/Year
Ammonia as N	Grab	Report	N/A	Once /Quarter

No E. Coli monitoring if fields are fenced

\* Report average daily flow for each calendar month.

Sampling requirements in the table above apply to effluent being discharged to the drip irrigation plots.

This permit allows the operation of a wastewater drip irrigation, treatment, and storage system with disposal of treated wastewater through approved drip dispersal areas. There shall be no discharge of wastewater to any surface waters or to any location where it is likely to enter surface waters. There shall be no discharge of wastewater to any open throat sinkhole. In addition, the drip irrigation system shall be operated in a manner preventing the creation of a health hazard or a nuisance.

The land application component shall be operated and maintained to ensure complete hydraulic infiltration within the soil profile, transmission of the effluent away from the point of application, and full utilization of the soil profile as a portion of the treatment system.

Instances of surface saturation, ponding or pooling within the land application area as a result of system operation are prohibited. Instances of surface saturation, ponding or pooling shall be promptly investigated and noted on the Monthly Operations Report. The report shall include details regarding location(s), determined cause(s), the actions taken to eliminate the issue, and the date the corrective actions were made. Any instances of surface saturation, ponding or pooling not associated with a major precipitation event not corrected within three days of discovery shall be reported to the local Environmental Field Office at that time for investigation. Surface saturation, ponding or pooling resulting in the discharge of treated wastewater into Waters of the State or to locations where it is likely to move to Waters of the State shall be immediately reported to the local Environmental Field Office, unless the discharge is separately authorized by a NPDES permit."

All drip fields shall be fenced sufficiently to prevent or impede unauthorized entry as well as to protect the facility from vandalism. Fencing shall be a minimum of four feet in height. Fencing



shall be constructed of durable materials. Gates shall be designed and constructed in a manner to prevent or impede unauthorized entry. All designs are subject to division approval. Fence shall be installed prior to beginning of operation.

All drip lines shall be buried and maintained 6 to 10 inches below the ground surface.

All new facilities must maintain a minimum 30 day storage capacity for surface spray irrigation systems.

The site shall be inspected by the certified operator or his/her designee, at a minimum, once per fourteen days (default) OR in accordance with an operating and maintenance inspection schedule in the permit administrative file record. The default inspection frequency will apply if an operating and maintenance inspection schedule is not submitted to be a part of the permit administrative file record. The operating and maintenance inspection schedule shall at a minimum evaluate the following via onsite visits or telemetry monitoring or a combination of the two:

- the condition of the treatment facility security controls (doors, fencing, gates, etc.),
- the condition of the drip area security controls (doors, fencing, gates, etc.),
- the condition of the site signage,
- the operational status of the mechanical parts of the treatment system (pumps, filters, telemetry equipment, etc.)
- the condition of the UV bulbs (if applicable)
- the condition of the land application area including the location of any ponding
- the name of the inspector
- the description of any corrective actions

Submission of the schedule, or revisions to the schedule, may be submitted to the division electronically. The schedule shall be submitted on or before the effective date of the permit. The permittee is responsible for maintaining evidence that the schedule, or revisions, have been submitted to the division.

## **B. MONITORING PROCEDURES**

### **1. Representative Sampling**

Samples and measurements taken in compliance with the monitoring requirements specified above shall be representative of the volume and nature of the monitored discharge, and shall be taken at the following location(s):

Effluent to drip irrigation plots.



## 2. Test Procedures

Unless otherwise noted in the permit, all pollutant parameters shall be determined according to methods prescribed in Title 40, CFR, Part 136.

### C. DEFINITIONS

The "daily maximum concentration" is a limitation on the average concentration, in milligrams per liter, of the discharge during any calendar day.

The "*monthly average concentration*", other than for *E. coli* bacteria, is the arithmetic mean of all the composite or grab samples collected in a one-calendar month period.

A "grab sample" is a single influent or effluent sample collected at a particular time.

For the purpose of this permit, "*continuous monitoring*" means collection of samples using a probe and a recorder with at least one data point per dosing cycle.

A "quarter" is defined as any one of the following three-month periods: January 1 through March 31, April 1 through June 30, July 1 through September 30, and/or October 1 through December 31.

"Wastewater" for the purpose of this permit means "sewage" as defined in TCA 69-3-103

### D. REPORTING

#### 1. Monitoring Results

Monitoring results shall be recorded consistent with the general requirements imposed in Part A above OR in accordance with the operating and maintenance inspection schedule in the permit administrative file record and submitted quarterly.

Submittals shall be postmarked no later than 15 days after the completion of the reporting period. A copy should be retained for the permittee's files. Monitoring results shall be reported in a format approved by the division. Operation reports and any communication regarding compliance with the conditions of this permit must be sent to:

Division of Water Resources  
Nashville Environmental Field Office  
711 R.S. Gass Boulevard  
Nashville, TN 37216

Sampling results may be submitted electronically to: [DWRWW.Report@tn.gov](mailto:DWRWW.Report@tn.gov).



The first operation report is due on the 15<sup>th</sup> of the month following the quarter containing the permit effective date. Until the construction of the treatment system is complete and the treatment system is placed into operation, operational reports shall report "monitoring not required".

## **2. Additional Monitoring by Permittee**

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified in Rule 0400-40-05-.07(2)(h)2, the results of such monitoring shall be included in the calculation and reporting of the values required in the Quarterly Operation Report. Such increased frequency shall also be indicated.

## **3. Falsifying Reports**

Knowingly making any false statement on any report required by this permit may result in the imposition of criminal penalties as provided for in Section 69-3-115 of the Tennessee Water Quality Control Act.

## **4. Signatory Requirement**

All reports or information submitted to the commissioner shall be signed and certified by the persons identified in Rules 0400-40-05-.05(6)(a-c).

# **PART II**

## **A. GENERAL PROVISIONS**

### **1. Duty to Reapply**

The permittee is not authorized to discharge after the expiration date of this permit. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit such information and forms as are required to the Director of Water Resources (the "Director") no later than 180 days prior to the expiration date.

### **2. Right of Entry**

The permittee shall allow the Director, or authorized representatives, upon the notification of permittee and presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or where records are required to be kept under the terms and conditions of this permit, and at reasonable times to copy these records;



b. To inspect at reasonable times any monitoring equipment or method or any collection, treatment, pollution management, or discharge facilities required under this permit; and

c. To sample at reasonable times any discharge of pollutants.

### 3. Availability of Reports

All reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Division of Water Resources.

### 4. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems (and related appurtenances) for collection and treatment which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory and process controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit. Backup continuous pH and flow monitoring equipment are not required.

The monitoring frequency stated in this permit shall not be construed as specifying a minimum level of operator attention to the facility. It is anticipated that visits to the treatment facility by the operator will occur at intervals frequent enough to assure proper operation and maintenance, but in no case less than one visit every fourteen days OR in accordance with an operating and maintenance inspection schedule in the permit administrative file record. If monitoring reports, division's inspection reports, or other information indicates a problem with the facility, the permittee may be subject to enforcement action and/or the permit may be modified to include increased parameter monitoring, increased monitoring frequency or other requirements as deemed necessary by the division to correct the problem. The permittee shall ensure that the certified operator is in charge of the facility and observes the operation of the system frequently enough to ensure its proper operation and maintenance regardless of the monitoring frequency stated in the permit

Dilution water shall not be added to comply with effluent requirements.

### 5. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.



**6. Severability**

The provisions of this permit are severable. If any provision of this permit due to any circumstance, is held invalid, then the application of such provision to other circumstances and to the remainder of this permit shall not be affected thereby.

**7. Other Information**

If the permittee becomes aware that he failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, then he shall promptly submit such facts or information.

**B. CHANGES AFFECTING THE PERMIT**

**1. Planned Changes**

The permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility.

**2. Permit Modification, Revocation, or Termination**

a. This permit may be modified, revoked and reissued, or terminated for cause as described in Section 69-3-108 (h) of the Tennessee Water Quality Control Act as amended.

b. The permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

**3. Change of Ownership**

This permit may be transferred to another person by the permittee if:

a. The permittee notifies the Director of the proposed transfer at least 30 days in advance of the proposed transfer date;

b. The notice includes a written agreement between the existing and new permittees containing a specified date for transfer of permit responsibility, coverage, and liability between them; and

c. The Director, within 30 days, does not notify the current permittee and the new permittee of his intent to modify, revoke or reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

**4. Change of Mailing Address**



The permittee shall promptly provide to the Director written notice of any change of mailing address. In the absence of such notice the original address of the permittee will be assumed to be correct.

## **C. NONCOMPLIANCE**

### **1. Effect of Noncompliance**

Any permit noncompliance constitutes a violation of applicable State laws and is grounds for enforcement action, permit termination, permit modification, or denial of permit reissuance.

### **2. Reporting of Noncompliance**

#### **a. 24-Hour Reporting**

In the case of any noncompliance which could cause a threat to public drinking supplies, or any other discharge which could constitute a threat to human health or the environment, the required notice of non-compliance shall be provided to the appropriate Division environmental field office within 24 hours from the time the permittee becomes aware of the circumstances. (The environmental field office should be contacted for names and phone numbers of emergency response personnel.)

A written submission must be provided within five days of the time the permittee becomes aware of the circumstances unless this requirement is waived by the Director on a case-by-case basis. The permittee shall provide the Director with the following information:

- i. A description of the discharge and cause of noncompliance;
- ii. The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and
- iii. The steps being taken to reduce, eliminate, and prevent recurrence of the non complying discharge.

#### **b. Scheduled Reporting**

For instances of noncompliance which are not reported under subparagraph 2.a. above, the permittee shall report the noncompliance on the Quarterly Operation Report. The report shall contain all information concerning the steps taken, or planned, to reduce, eliminate, and prevent recurrence of the violation and the anticipated time the violation is expected to continue.

### **3. Overflow**



a. **"Overflow"** means the discharge of wastewater from any portion of the collection, transmission, or treatment system other than through permitted outfalls.

b. Overflows are prohibited.

c. The permittee shall operate the collection system so as to avoid overflows.

d. No new or additional flows shall be added upstream of any point in the collection system, which experiences chronic overflows (greater than 5 events per year) or would otherwise overload any portion of the system. Unless there is specific enforcement action to the contrary, the permittee is relieved of this requirement after: 1) an authorized representative of the Commissioner of the Department of Environment and Conservation has approved an engineering report and construction plans and specifications prepared in accordance with accepted engineering practices for correction of the problem; 2) the correction work is underway; and 3) the cumulative, peak-design, flows potentially added from new connections and line extensions upstream of any chronic overflow point are less than or proportional to the amount of inflow and infiltration removal documented upstream of that point. The inflow and infiltration reduction must be measured by the permittee using practices that are customary in the environmental engineering field and reported in an attachment to a Monthly Operating Report submitted to the local TDEC Environmental Field Office on a quarterly basis. The data measurement period shall be sufficient to account for seasonal rainfall patterns and seasonal groundwater table elevations.

e. In the event that more than 5 overflows have occurred from a single point in the collection system for reasons that may not warrant the self-imposed moratorium or completion of the actions identified in this paragraph, the permittee may request a meeting with the Division of Water Resources EFO staff to petition for a waiver based on mitigating evidence.

#### 4. Upset

a. **"Upset"** means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

b. An upset shall constitute an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

i. An upset occurred and that the permittee can identify the cause(s) of the upset;

ii. The permitted facility was at the time being operated in a prudent and workman-like manner and in compliance with proper operation and maintenance procedures;



iii. The permittee submitted information required under "Reporting of Noncompliance" within 24-hours of becoming aware of the upset (if this information is provided orally, a written submission must be provided within five days); and

iv. The permittee complied with any remedial measures required under "Adverse Impact."

## 5. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the waters of Tennessee resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

## 6. Bypass

- a. "**Bypass**" is the intentional diversion of wastewater away from any portion of a treatment facility.
- b. Bypasses are prohibited, unless:
  - i. The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
  - ii. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
  - iii. For anticipated bypass, the permittee submits prior notice, if possible at least ten days before the date of the bypass; or
  - iv. For unanticipated bypass, the permittee submits notice of an unanticipated bypass within 24 hours from the time that the permittee becomes aware of the bypass.
- c. A bypass that does not cause effluent limitations to be exceeded may be allowed only if the bypass is necessary for essential maintenance to assure efficient operation.
- d. "Severe property damage" when used to consider the allowance of a bypass means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.



#### **D. LIABILITIES**

##### **1. Civil and Criminal Liability**

Nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance. Notwithstanding this permit, the permittee shall remain liable for any damages sustained by the State of Tennessee, including but not limited to fish kills and losses of aquatic life and/or wildlife, as a result of the discharge of wastewater to any surface or subsurface waters. Additionally, notwithstanding this Permit, it shall be the responsibility of the permittee to conduct its wastewater treatment and/or discharge activities in a manner such that public or private nuisances or health hazards will not be created.

##### **2. Liability Under State Law**

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law.

### **PART III OTHER REQUIREMENTS**

#### **A. CERTIFIED OPERATOR**

The waste treatment facilities shall be operated under the supervision of a Biological Natural System certified wastewater treatment operator in accordance with the Water Environmental Health Act of 1984.

#### **B. PLACEMENT OF SIGNS**

The permittee shall place a sign at the entrance to the land application area if fenced or all reasonable approaches to the land application area. The sign should be clearly visible to the public. The minimum sign size should be two feet by two feet (2' x 2') with one inch (1") letters. The sign should be made of durable material

**RECLAIMED WASTEWATER  
DRIP IRRIGATION  
(PERMITTEE'S NAME)  
(PERMITTEE'S PHONE NUMBER)  
TENNESSEE DIVISION OF WATER  
RESOURCES  
Nashville Environmental Field Office  
PHONE NUMBER: 1-888-891-8332**



No later than sixty (60) days from the effective date of the permit, the permittee shall have the above sign(s) on display in the location specified. New facilities must have the signs installed upon commencing operation.

#### **C. ADDITION OF WASTE LOADS**

The permittee may not add wasteloads to the existing treatment system without the knowledge and approval of the division.

#### **D. SEPTIC (STEP) TANK OPERATION**

The proper operation of this treatment system depends, largely, on the efficient use of the septic tank. The solids that accumulate in the tank shall be removed at a frequency that is sufficient to insure that the treatment plant will comply with the discharge requirements of this permit.

#### **E. SEPTAGE MANAGEMENT PRACTICES**

The permittee must comply with the provisions of Rule 0400-48-01-.22. If the septage is transported to another POTW for disposal, the permittee shall note the amount of septage wasted in gallons and name of the facility the hauler intends to use for disposal of the septage on the monthly operation report. Sludge or any other material removed by any treatment works must be disposed of in a manner which prevents its entrance into or pollution of any surface or subsurface waters. Additionally, the disposal of such sludge or other material must be in compliance with the Tennessee Solid Waste Disposal Act, TCA 68-31-101 et seq. and Tennessee Hazardous Waste Management Act, TCA 68-46-101 et seq.

#### **F. OWNERSHIP OF THE TREATMENT FACILITIES**

a. The permittee shall own the treatment facilities (and the land upon which they are constructed) including the land to be utilized for drip or spray irrigation. Evidence of ownership of the treatment facility and land application site(s) must be furnished to the division for approval prior to initiation of operation the wastewater collection and treatment system for sewer service to any structure.

b. Where the treatment facility serves private homes, condominiums, apartments, retirement homes, nursing homes, trailer parks, or any other place where the individuals being served have property ownership, rental agreements, or other agreements that would prevent their being displaced in the event of abandonment or noncompliance of the sewerage system, ownership of the treatment facilities must be by a municipality, a public utility, a wastewater authority, or a privately owned public utility (having a Certificate of Convenience and Necessity from the Tennessee Public Utility Commission) or another public agency.







**Attachment 1**



**RATIONALE**

**Tennessee Wastewater Systems, Inc.**  
**STATE OPERATION PERMIT NO. SOP-22004**  
**Clarksville, Montgomery County, Tennessee**

**Permit Writer: Mr. Bryan Pope**

**FACILITY CONTACT INFORMATION:**

Mr. Jeff Riden  
Chief Executive Officer  
Phone: (615) 220-7171  
jeff.riden@adenus.com  
2110 River Rd.  
Smyrna, TN 37167

**Activity Description:** Treatment of domestic wastewater via a decentralized waste water system to support construction of

**Facility location:** Latitude 36.46163 and Longitude -87.39153

**Name of the nearest stream:** No discharge allowed.

**Treatment system:**

**Permit period:** This permit will be issued for a five year period effective from the issuance date on the title page.

**Terms & Conditions:** BOD<sub>5</sub> is a standard measure of sewage strength. The 45 mg/L daily maximum limit is the required treatment standard for domestic waste water in Tennessee. Ammonia and BOD<sub>5</sub> reporting serve to demonstrate the treatment system is meeting minimum treatment standards. Land application, versus stream discharge, enables reduced monitoring frequency for these parameters. Narrative conditions for drip disposal and septage management are proposed in support of proper system operation to prevent runoff to streams and avoidance of nuisance conditions. E.coli limits apply when the disposal area is not fenced.

**Financial Security:** Municipalities and Utility Districts are government entities exempt from the financial security requirement in TCA 69-3-122.

**Annual Maintenance Fee:** An annual maintenance fee for the permit will apply after permit issue and upon receipt of an invoice. The fee is currently \$350.00 for non-discharging facilities with influent flow less than 0.075 MGD.



**Items Requisite for  
Operation:**

This draft permit proposes terms and conditions for planning purposes and to seek public comment on the potential water quality impacts of the proposed activity. Actual operation of the sewerage system is contingent on the following items (items may occur in any order):

- Approval of sewerage system construction plans and specifications per TCA 69-3-108(i),
- Final construction inspection and submission of O &M manual per Rule 0400-40-02-.09,
- Utility ownership of sewerage system assets consistent with Rule 0400-40-16-.02(8). Sewerage system assets broadly consist of those units integral to the collection, treatment and disposal of both the solid and liquid component of sewage (i.e. septic tanks and pumps, collection lines, treatment system and drip irrigation area and related appurtenances), and
- Final issue of the permit.



**From:** [bryan.pope@tn.gov](mailto:bryan.pope@tn.gov)  
**To:** [Jeff Risdien](#)  
**Cc:** [bryan.pope@tn.gov](mailto:bryan.pope@tn.gov)  
**Subject:** TDEC-DWR - Notice of Complete Permit Application  
**Date:** Wednesday, April 27, 2022 11:30:05 AM

---

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

State of Tennessee  
Department of Environment and Conservation  
Division of Water Resources

---

Permit Number	SOP-22004
Permittee Name	Tennessee Wastewater Systems, Inc.
Project Name	Hilltop Ridge

---

The Division of Water Resources (the division) acknowledges the receipt of a permit application in our office on 01-FEB-22.

Rules of the Tennessee Department of Environment and Conservation, Division of Water Resources, Chapter 0400-40-5-.05 (2): Permit Application, Issuance, state, in part: "The applicant will be provided notice of completeness of the application and re-submitted material within 30 days of a determination that such material constitutes a complete application. This provision does not preclude the commissioner from later requesting additional material that subsequent to the notice of completeness is determined to be necessary for permit processing."

Your application was deemed complete on 27-APR-22.

Details regarding this permit application and associated documents can be viewed at:  
[https://dataviewers.tdec.tn.gov/pls/enf\\_reports/f?p=9034:34051::::34051:P34051\\_PERMIT\\_NUMBER:SOP-22004](https://dataviewers.tdec.tn.gov/pls/enf_reports/f?p=9034:34051::::34051:P34051_PERMIT_NUMBER:SOP-22004)

If you have questions, please contact Bryan Pope at 931-224-3098 or by E-mail at [bryan.pope@tn.gov](mailto:bryan.pope@tn.gov).

Thank you for helping us protect Tennessee waters.

---

We accept and encourage electronic document submittals via [Water.Permits@tn.gov](mailto:Water.Permits@tn.gov)

Please tell us how you think we're doing by completing TDEC Customer Satisfaction Survey at:  
<https://www.surveymonkey.com/r/TDECSurvey>



EX-20

RD

STATE OF TENNESSEE

DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
WATER AND WASTEWATER OPERATOR CERTIFICATION BOARD

I.D. NO.

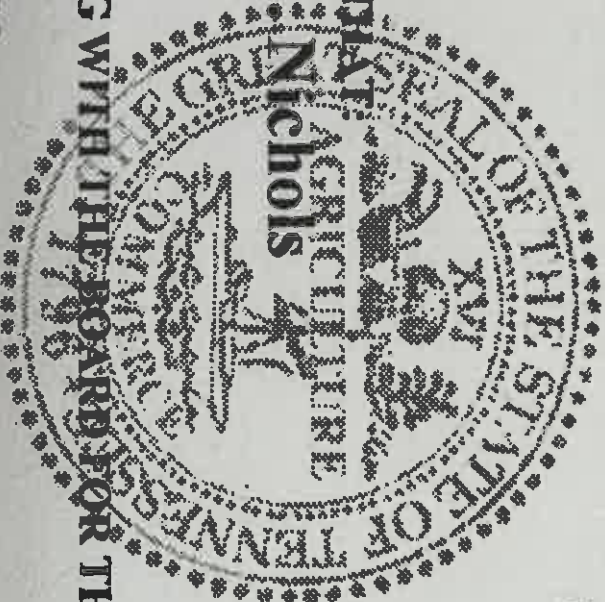
15046

EXPIRATION DATE

12/31/2022

THIS IS TO CERTIFY THAT

Tracy A. Nichols



IS IN GOOD STANDING WITH THE BOARD FOR THE CLASSIFICATIONS  
LISTED:

BNS, CS2

WHEN CORRESPONDING ALWAYS REFER TO YOUR I.D. NUMBER  
AND SEND NOTIFICATION OF ADDRESS CHANGE



**Confidential Exhibit 23A**



**Confidential Exhibit 23B**



**Confidential Exhibit 23C**



**Tennessee Wastewater Systems, Inc.**  
**Account Listing**  
**February 8, 2021**

2:05 PM

02/08/21

Account	Type	Acct. #
1072 • Bill.com Money Out Clearing	Bank	1072
131 • Cash	Bank	131
131 • Cash:131.1 • AmSouth - CD	Bank	131.1
131 • Cash:131.14 • FirstBank - Checking	Bank	131.14
131 • Cash:131.15 • FirstBank - Rider Depository	Bank	131.15
131 • Cash:131.16 • FirstBank - CIAC	Bank	131.16
131 • Cash:131.17 • FirstBank - Escrow	Bank	131.17
Accounts Receivable	Accounts Re...	141
141 • Customer A/R	Accounts Re...	141.1
141 • Customer A/R:141.1 • Sewer Service	Accounts Re...	141.12
141 • Customer A/R:141.1 • Sewer Service:141.12 • East TN	Accounts Re...	143
141 • Customer A/R:143 • Bad Debt Reserve	Accounts Re...	186.3
186.3 • Regulatory Assets	Other Curren...	186.32
186.3 • Regulatory Assets:186.32 • Legal Recovery Receivable	Other Curren...	186.31
186.3 • Regulatory Assets:186.31 • Enviro Rider Settlement	Other Curren...	99.99
99.99 • Customer Count Offset	Other Curren...	99.01
99.99 • Customer Count Offset:99.01 • Customer Count - Rate Class 1	Other Curren...	99.02
99.99 • Customer Count Offset:99.02 • Customer Count - Rate Class 2	Other Curren...	99.03
99.99 • Customer Count Offset:99.03 • Customer Count - Rate Class 5	Other Curren...	99.04
99.99 • Customer Count Offset:99.04 • Customer Count - Rate Class 6	Other Curren...	99.05
99.99 • Customer Count Offset:99.05 • Customer Count - Rate Class 9	Other Curren...	99.06
99.99 • Customer Count Offset:99.06 • Customer Count - Comm Cabin	Other Curren...	99.07
99.99 • Customer Count Offset:99.07 • Customer Count - Comm w/ Food	Other Curren...	99.08
99.99 • Customer Count Offset:99.08 • Customer Count - Comm Norflood	Other Curren...	151.00
151.00 • Plant Material & Supplies	Other Curren...	174
174 • Misc. Current and Accrued Asset	Other Curren...	174.2
174 • Misc. Current and Accrued Asset:174.2 • Construction Pass-Maple Green	Other Curren...	174.5
174 • Misc. Current and Accrued Asset:174.5 • UMS Undeposited Funds	Other Curren...	174.6
174 • Misc. Current and Accrued Asset:174.6 • Prepaid Expenses	Fixed Asset	105.0
105.0 • Construction in Process	Fixed Asset	105.1
105.0 • Construction in Process:105.1 • Smoky Village	Fixed Asset	105.2
105.0 • Construction in Process:105.2 • Maple Green	Fixed Asset	105.3
105.0 • Construction in Process:105.3 • Cedar Hill	Fixed Asset	105.4
105.0 • Construction in Process:105.4 • Hidden Springs TDEC Project	Fixed Asset	105.5
105.0 • Construction in Process:105.5 • TDEC Cross Plains Rehab	Fixed Asset	101
101 • Utility Plant in Service	Fixed Asset	353
101 • Utility Plant in Service:353 • Land	Fixed Asset	353.4
101 • Utility Plant in Service:353.4 • Land - Capital Asset	Fixed Asset	354
101 • Utility Plant in Service:354 • Structures & Improv - Capital	Fixed Asset	355
101 • Utility Plant in Service:355 • Structures & Improvements	Fixed Asset	360.5
101 • Utility Plant in Service:360.5 • Sewer Force Main - Capital	Fixed Asset	360
101 • Utility Plant in Service:360 • Collection Sewers-Force	Fixed Asset	361
101 • Utility Plant in Service:361 • Collection Sewers-Gravity	Fixed Asset	380
101 • Utility Plant in Service:380 • Treatment and Disposal Equip	Fixed Asset	390
101 • Utility Plant in Service:390 • Office Furniture & Misc. Equip	Fixed Asset	391
101 • Utility Plant in Service:391 • Transportation Equipment	Fixed Asset	108
108 • Accum. Deprec.-Utility Plant	Fixed Asset	108.1
108.1 • Accum. Deprec.- Equip	Fixed Asset	108.2
108.2 • Accum. Deprec.Cap. - Buildings	Fixed Asset	



**Tennessee Wastewater Systems, Inc.**  
**Account Listing**  
February 8, 2021

2:05 PM  
02/08/21

Account	Type	Acct. #
108.3 · Accum. Deprec.Cap. - Force Main	Fixed Asset	108.3
108.4 · Accum. Deprec.Cap. - Treatment	Fixed Asset	108.4
175 · Security Deposits Paid	Other Asset	175
Deferred Tax Benefits	Other Asset	
231 · Accounts Payable	Accounts Pa...	231
253 · Other Deferred Liabilities	Other Curren...	253
253 · Other Deferred Liabilities:253.1 · Defer Rev - Settlement Tariff	Other Curren...	253.1
253 · Other Deferred Liabilities:253.2 · Deferred CIAC Revenue	Other Curren...	253.2
236.12 · Tax from CIAC	Other Curren...	236.12
2110 · Direct Deposit Liabilities	Other Curren...	2110
241 · Misc. Current & Accrued Liab.	Other Curren...	241
241 · Misc. Current & Accrued Liab.:241.1 · Payroll Liabilities	Other Curren...	241.1
241 · Misc. Current & Accrued Liab.:241.1 · Payroll Liabilities:241.1.6 · Affac Payable	Other Curren...	241.1.6
241 · Misc. Current & Accrued Liab.:241.1 · Payroll Liabilities:241.1.5 · Workers Comp Payable	Other Curren...	241.1.5
241 · Misc. Current & Accrued Liab.:241.1 · Payroll Liabilities:241.1.4 · Simple IRA Payable	Other Curren...	241.1.4
242 · Intercompany Liabilities	Other Curren...	242
242 · Intercompany Liabilities:242.1 · Intercompany-Adenus Group	Other Curren...	242.1
242 · Intercompany Liabilities:242.10 · Intercompany-ALWW	Other Curren...	242.10
242 · Intercompany Liabilities:242.5 · Intercompany-Adenus Operations	Other Curren...	242.5
242 · Intercompany Liabilities:242.6 · Adenus Technologies	Other Curren...	242.6
242 · Intercompany Liabilities:242.7 · Intercompany-Commonwealth	Other Curren...	242.7
242 · Intercompany Liabilities:242.9 · Intercompany Cash	Other Curren...	242.9
232 · Notes Payable	Long Term L...	232
232 · Notes Payable:232.9 · Wilson B&T - (2) Skid Steers	Long Term L...	232.9
232 · Notes Payable:232.10 · Wilson B&T - ETN Truck	Long Term L...	232.10
232 · Notes Payable:232.11 WB&T - Truck	Long Term L...	
232 · Notes Payable:232.12 · FB Environmental Loan - RR	Long Term L...	232.12
232 · Notes Payable:232.13 · Wilson B&T - Bobcat ETN Loan	Long Term L...	232.13
265 · Misc. Operating Reserves	Long Term L...	265
265 · Misc. Operating Reserves:265.1 · Inspection Costs	Long Term L...	265.1
265 · Misc. Operating Reserves:265.2 · Sewer Sys/Comp Repl - Post 2006	Long Term L...	265.2
265 · Misc. Operating Reserves:265.4 · Eudaily Reserve	Long Term L...	265.4
215 · Retained Earnings	Equity	215
271 · Cont. In Aid of Construction	Equity	271
271 · Cont. In Aid of Construction:271.1 · CIAC - Williamson County	Equity	271.1
271 · Cont. In Aid of Construction:271.5 · CIAC -ETN Capital	Equity	271.5
272 · Accum. Amort. on CIAC	Equity	272
400 · Operating Revenues	Income	400
400 · Operating Revenues:521 · Flat Rate Revenues	Income	521
400 · Operating Revenues:521 · Flat Rate Revenues:521.1 · Residential-Flat Sewer	Income	521.1
400 · Operating Revenues:521 · Flat Rate Revenues:521.1 · Residential-Flat Sewer:521.1.1 · Resid...	Income	521.1.1
400 · Operating Revenues:521 · Flat Rate Revenues:521.1 · Residential-Flat Sewer:521.1.2 · Resid...	Income	521.1.2
400 · Operating Revenues:521 · Flat Rate Revenues:521.1 · Residential-Flat Sewer:521.1.3 · Resid...	Income	521.1.3
400 · Operating Revenues:521 · Flat Rate Revenues:521.1 · Residential-Flat Sewer:521.1.4 · Resid...	Income	521.1.4
400 · Operating Revenues:521 · Flat Rate Revenues:521.1 · Residential-Flat Sewer:521.1.5 · Resid...	Income	521.1.5
400 · Operating Revenues:521 · Flat Rate Revenues:521.2 · Commercial Sewer	Income	521.2
400 · Operating Revenues:521 · Flat Rate Revenues:521.2 · Commercial Sewer:521.2.1 · Commercial ...	Income	521.2.1
400 · Operating Revenues:521 · Flat Rate Revenues:521.2 · Commercial Sewer:521.2.2 · Commercial ...	Income	521.2.2
400 · Operating Revenues:521 · Flat Rate Revenues:521.2 · Commercial Sewer:521.2.3 · Commercial ...	Income	521.2.3



# Tennessee Wastewater Systems, Inc.

## Account Listing

February 8, 2021

Account	Type	Acct. #
400 · Operating Revenues:522 · Measured Revenues	Income	522
400 · Operating Revenues:522 · Measured Revenues:522.1 · Residential	Income	522.1
400 · Operating Revenues:536 · Other Wastewater Revenues	Income	536
400 · Operating Revenues:536 · Other Wastewater Revenues:536.1 · Sewer Access Fees	Income	536.1
400 · Operating Revenues:536 · Other Wastewater Revenues:536.3 · Operations & Maintenance	Income	536.3
400 · Operating Revenues:536 · Other Wastewater Revenues:536.4 · Billing & Collections	Income	536.4
400 · Operating Revenues:536 · Other Wastewater Revenues:536.5 · Bonding	Income	536.5
400 · Operating Revenues:536 · Other Wastewater Revenues:536.5 · Bonding:536.5.1 · Bonding - Sta...	Income	536.5.1
400 · Operating Revenues:536 · Other Wastewater Revenues:536.5 · Bonding:536.5.2 · Bonding - Goo...	Income	536.5.2
400 · Operating Revenues:536 · Other Wastewater Revenues:536.5 · Bonding:536.5.3 · Bonding - Mil...	Income	536.5.3
400 · Operating Revenues:536 · Other Wastewater Revenues:536.6 · Franchise Income	Income	536.6
400 · Operating Revenues:536 · Other Wastewater Revenues:536.7 · Blotilde	Income	536.7
400 · Operating Revenues:536 · Other Wastewater Revenues:536.9 · Penalty Fees	Income	536.9
400 · Operating Revenues:536 · Other Wastewater Revenues:536.10 · Disconnected/Reconnect Charges	Income	536.10
530 · Guaranteed Revenues	Income	530
419 · Interest Earned	Income	419
421 · Nonutility Income	Income	421
421 · Nonutility Income:421.2 · Gain/Loss on Sale of Assets	Income	421.2
421 · Nonutility Income:421.3 · Utility Fee	Income	421.3
421 · Nonutility Income:421.4 · Professional Services	Income	421.4
421 · Nonutility Income:421.5 · Developer Income	Income	421.5
421 · Nonutility Income:421.7 · Construction Income	Income	421.7
401 · Operating Expenses	Expense	401
401 · Operating Expenses:701.6 · Salary & Wages - Construction	Expense	701.6
401 · Operating Expenses:701 · Salaries and Wages - Employees	Expense	701
401 · Operating Expenses:703 · Salaries and Wages - Officers	Expense	703
401 · Operating Expenses:704 · Employee Benefits	Expense	704
401 · Operating Expenses:704 · Employee Benefits:704.2 · Life Insurance	Expense	704.2
401 · Operating Expenses:704 · Employee Benefits:704.1 · Workers Compensation	Expense	704.1
401 · Operating Expenses:705 · Simple IRA	Expense	705
401 · Operating Expenses:710 · Purchased Wastewater Treatment	Expense	710
401 · Operating Expenses:715 · Purchased Power	Expense	715
401 · Operating Expenses:716 · Telemetry Monitoring	Expense	716
401 · Operating Expenses:718 · Biotide	Expense	718
401 · Operating Expenses:720 · Materials and Supplies	Expense	720
401 · Operating Expenses:731 · Contractual Svc - Professional	Expense	731
401 · Operating Expenses:735 · Contractual Svc - Testing	Expense	735
401 · Operating Expenses:736 · Contractual Services	Expense	736
401 · Operating Expenses:736 · Contractual Services:736.01 · Sign-up Costs	Expense	736.01
401 · Operating Expenses:736 · Contractual Services:736.02 · Contract Maintenance	Expense	736.02
401 · Operating Expenses:736 · Contractual Services:736.03 · Contractual Svc	Expense	736.03
401 · Operating Expenses:736 · Contractual Services:736.04 · Subcontract Work	Expense	736.04
401 · Operating Expenses:736 · Contractual Services:736.05 · Access Fees	Expense	736.05
401 · Operating Expenses:736 · Contractual Services:736.08 · Lawn Mowing	Expense	736.08
401 · Operating Expenses:736 · Contractual Services:736.10 · One-Call Expenses	Expense	736.10
401 · Operating Expenses:736 · Contractual Services:736.11 · Contractual Profit Sharing	Expense	736.11
401 · Operating Expenses:736 · Contractual Services:736.12 · AUG - MGMT Fees	Expense	736.12
401 · Operating Expenses:736 · Contractual Services:736.13 · IT Expenses	Expense	736.13
401 · Operating Expenses:736 · Contractual Services:736.9 · Aderus Group - MGMT Fees	Expense	736.9



**Tennessee Wastewater Systems, Inc.**  
**Account Listing**  
**February 8, 2021**

2:05 PM  
02/08/21

Account	Type	Acct. #
401 · Operating Expenses:740 · Rent	Expense	740
401 · Operating Expenses:750 · Transportation Expense	Expense	750
401 · Operating Expenses:750 · Transportation Expense:750.3 · Registration Renewal	Expense	750.3
401 · Operating Expenses:750 · Transportation Expense:750.1 · Fuel	Expense	750.1
401 · Operating Expenses:750 · Transportation Expense:750.2 · Vehicle Maintenance	Expense	750.2
401 · Operating Expenses:755 · Insurance	Expense	755
401 · Operating Expenses:755 · Insurance:755.10 · Dental Insurance	Expense	755.10
401 · Operating Expenses:755 · Insurance:755.8 · Auto Insurance	Expense	755.8
401 · Operating Expenses:755 · Insurance:755.9 · Health Insurance	Expense	755.9
401 · Operating Expenses:765 · Regulatory Commission Exp.	Expense	765
401 · Operating Expenses:765 · Regulatory Commission Exp.:765.1 · Rate Case Work	Expense	765.1
401 · Operating Expenses:765 · Regulatory Commission Exp.:765.2 · Filing Fee	Expense	765.2
401 · Operating Expenses:765 · Regulatory Commission Exp.:765.3 · Inspection Fee	Expense	765.3
401 · Operating Expenses:770 · Bad Debt	Expense	770
401 · Operating Expenses:775 · Miscellaneous Expenses	Expense	775
401 · Operating Expenses:775 · Miscellaneous Expenses:DVF Misc Account	Expense	775.21
401 · Operating Expenses:775 · Miscellaneous Expenses:775.21 · Website and Internet Hosting	Expense	775.21
401 · Operating Expenses:775 · Miscellaneous Expenses:775.27 · Equipment Maintenance	Expense	775.27
401 · Operating Expenses:775 · Miscellaneous Expenses:775.28 · Equipment Rental	Expense	775.28
401 · Operating Expenses:775 · Miscellaneous Expenses:775.25 · Small Equipment Purchase	Expense	775.25
401 · Operating Expenses:775 · Miscellaneous Expenses:775.1 · Telephone	Expense	775.1
401 · Operating Expenses:775 · Miscellaneous Expenses:775.10 · Office Supplies	Expense	775.10
401 · Operating Expenses:775 · Miscellaneous Expenses:775.11 · Letter of Credit - Fees	Expense	775.11
401 · Operating Expenses:775 · Miscellaneous Expenses:775.11 · Letter of Credit - Fees:775.111 · ...	Expense	775.111
401 · Operating Expenses:775 · Miscellaneous Expenses:775.11 · Letter of Credit - Fees:775.112 · ...	Expense	775.112
401 · Operating Expenses:775 · Miscellaneous Expenses:775.11 · Letter of Credit - Fees:775.113 · ...	Expense	775.113
401 · Operating Expenses:775 · Miscellaneous Expenses:775.12 · Depreciation Expense	Expense	775.12
401 · Operating Expenses:775 · Miscellaneous Expenses:775.13 · Easement Fees	Expense	775.13
401 · Operating Expenses:775 · Miscellaneous Expenses:775.2 · Postage	Expense	775.2
401 · Operating Expenses:775 · Miscellaneous Expenses:775.20 · Software Licenses	Expense	775.20
401 · Operating Expenses:775 · Miscellaneous Expenses:775.23 · Maintenance Agreements	Expense	775.23
401 · Operating Expenses:775 · Miscellaneous Expenses:775.3 · Licenses & Permits	Expense	775.3
401 · Operating Expenses:775 · Miscellaneous Expenses:775.4 · Membership Dues	Expense	775.4
401 · Operating Expenses:775 · Miscellaneous Expenses:775.5 · Deed Registration	Expense	775.5
401 · Operating Expenses:775 · Miscellaneous Expenses:775.6 · Franchise Fees	Expense	775.6
401 · Operating Expenses:775 · Miscellaneous Expenses:775.7 · Public Notice Costs	Expense	775.7
401 · Operating Expenses:775 · Miscellaneous Expenses:775.8 · Interest on Customer Deposits	Expense	775.8
401 · Operating Expenses:775 · Miscellaneous Expenses:775.9 · Billing Costs	Expense	775.9
408 · Taxes Other than Income	Expense	408
408 · Taxes Other than Income:408.1 · Property Taxes	Expense	408.1
408 · Taxes Other than Income:408.3 · Franchise & Excise	Expense	408.3
408 · Taxes Other than Income:408.4 · Labor & Workforce Dev.	Expense	408.4
408 · Taxes Other than Income:408.5 · Personal Privilege Tax	Expense	408.5
408 · Taxes Other than Income:408.6 · Public Utility	Expense	408.6
408 · Taxes Other than Income:408.7 · Tax Penalties	Expense	408.7
408 · Taxes Other than Income:408.12 · Payroll Taxes	Expense	408.12
408 · Income Tax	Expense	408
426 · Misc. Nonutility Expenses	Expense	426
426 · Misc. Nonutility Expenses:426.8 · Penalties/Fines	Expense	426.8



**Tennessee Wastewater Systems, Inc.**  
**Account Listing**  
**February 8, 2021**

Account	Type	Acct. #
426 · Misc. Nonutility Expenses: 246.91 · Lodging	Expense	246.91
426 · Misc. Nonutility Expenses: 426.9 · Meals and Entertainment	Expense	426.9
426 · Misc. Nonutility Expenses: 426.1 · Dues and Subscriptions	Expense	426.1
426 · Misc. Nonutility Expenses: 426.2 · Bank & NSF Fees	Expense	426.2
426 · Misc. Nonutility Expenses: 426.3 · Miscellaneous	Expense	426.3
426 · Misc. Nonutility Expenses: 426.4 · Parking	Expense	426.4
426 · Misc. Nonutility Expenses: 426.5 · Developer Income Reimbursement	Expense	426.5
426 · Misc. Nonutility Expenses: 426.7 · Construction Expense	Expense	426.7
427 · Interest Expense	Expense	427
427 · Interest Expense: 427.1 · Interest on Debt to Associated	Expense	427.1
427 · Interest Expense: 427.2 · Loan Interest	Expense	427.2
427 · Interest Expense: 427.5 · Sewer Deposit Interest	Expense	427.5
66900 · Reconciliation Discrepancies	Expense	66900
421.6 · Misc. Income	Other Income	421.6
90100 · Purchase Orders	Non-Posting	90100
90200 · Sales Orders	Non-Posting	90200



**Confidential Exhibit 26**



**Confidential Exhibit 28**



Tennessee Wastewater Systems, Inc.

TPUC No. 2

Section 3

First Revised Page 6

**WASTEWATER UTILITY SERVICE**


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<u>Service Territory</u>	<u>County</u>	<u>TPUC Docket #</u>	<u>Rate Class</u>
Smokey Mountain Reflections RV Park	Sevier	07-00235	RATE CLASS 1
Milky Way Farms	Giles	08-00029	RATE CLASS 1
Preserve Condominiums	DeKalb	08-00113	RATE CLASS 1
Tarpley Shop Utility District	Giles	08-00161	RATE CLASS 5
Lakeside Meadows	Monroe	08-00162	RATE CLASS 1
Fairway Vistas	Blount	08-00163	RATE CLASS 1
Saddle Ridge	Monroe	08-00209	RATE CLASS 1
Scenic River	Monroe	09-00006	RATE CLASS 1
Preserve at Eagle Rock	Hamblen	09-00007	RATE CLASS 1
Bluff at Bradbury Farms	Montgomery	11-00155	RATE CLASS 1
Scales Project	Williamson	14-00006	RATE CLASS 1
Clovercroft Farms/Clovercroft Wells TF			
Clovercroft Preserve	Williamson	14-00062	RATE CLASS 1
Clovercroft Acres/Clovercroft Tulloss TF			
Enclave at Dove Lake	Williamson	15-00025	RATE CLASS 1
Lighthouse Pointe	Grainger	17-00146	RATE CLASS 1
Warrioto Hills	Montgomery	18-00107	RATE CLASS 1
Chelsea's Way	Robertson	19-00030	RATE CLASS 1
Oak Plains	Montgomery	21-00075	RATE CLASS 1
The Pointe	Clay	21-00026	RATE CLASS 1
Derby Meadows	Robertson	22-00074	RATE CLASS 1
Lake Haven	Jefferson	XX-XXXXXX	RATE CLASS 1 (T)
Hilltop Ridge	Montgomery	XX-XXXXXX	RATE CLASS 1 (T)

---

**Issued:****Effective:****Issued By: Matthew Nicks, President**



**WASTEWATER UTILITY SERVICE****SECTION 4 – RESIDENTIAL RATES SHEET**

	<b>Base</b>	<b>Escrow</b>	<b>Bonding</b>	<b>Environmental Rider</b>	<b>Legal Rider (D)</b>	<b>Total</b>
<b>Rate Class 1</b>	\$ 40.48	\$ 7.27	\$0.12 (R)	\$3.76	0	\$ 51.63(R)
<b>Rate Class 2</b>	\$ 40.48	\$ 7.27	\$0.12 (R)	\$3.76	0	\$ 51.63(R)
<b>Rate Class 5</b>	\$ 36.66	\$ 5.69	\$0.12 (R)	\$3.76	0	\$ 46.23(R)
<b>Rate Class 6</b>	\$ 36.66	\$ 5.69	\$0.12 (R)	\$3.76	0	\$ 46.23(R)
<b>Rate Class 9</b>	\$ 20.55	\$ 3.39	\$0.12 (R)	\$3.76	0	\$ 27.82*(R)

\* Southridge customers will have a pass-through treatment cost assessed to their monthly bill. The pass-through treatment cost is calculated using the water meter readings as provided to TWSI by the East Montgomery Water Co. and the multiplier charged to TWSI by Clarksville Gas and Water to provide wastewater treatment. This cost will be filed annually with TPUC in June and effective upon approval. The current pass through treatment cost is 0.0089100097 (R) per gallon.

\*\* Each condominium unit will be billed as a residential customer and be individually billed.

\*\*\* Customers in the City of Coopertown will be billed a 3% franchise fee (applied to the base rate only).

\*\*\*\* The bonding fee will be updated with an annual filing with TPUC in August and effective upon approval.

**Fees:**

Non-Payment – 5% of total bill amount

Disconnection – \$40

Reconnection – \$50

Returned Check (NSF Fee) – \$25

Returned ACH - \$25

Capacity Reservation Fee – \$10 per month (See Rules and Regulations for Explanation)

Credit Card Convenience Fee: 2.45% with a \$1.25 minimum fee (R)(N)

City of Coopertown Franchise Fees: 3%

**Issued: June 29, 2022**

**Effective: August 1, 2022**

**Issued by: Matthew Nicks, President**



Hilltop Ridge Subdivision

15-Nov-22

Projected Income Statement

Line No.	Item	Year 1	Year 2	Year 3	Year 4	Year 5
	Number of Sewer Customers	15	40	60	71	71
	<u>Access Fees</u>					
	Number of lots with sewer access but no customer	56	31	11	0	0
	Access fee revenue (\$120 x lots)	\$ 6,720.00	\$ 3,720.00	\$ 1,320.00	\$ -	\$ -
	<u>Operating Revenue</u>					
1	Service Revenue	\$ 9,392.40	\$ 25,046.40	\$ 37,569.60	\$ 44,457.36	\$ 44,457.36
2	Re-connect Fees	\$ -	\$ -	\$ -	\$ -	\$ -
3	Returned Check Charge	\$ -	\$ -	\$ -	\$ -	\$ -
4	Late Payment Charge	\$ -	\$ -	\$ -	\$ -	\$ -
5	Total Operating Revenue (sum of Line 1 through 4)	\$ 9,392.40	\$ 25,046.40	\$ 37,569.60	\$ 44,457.36	\$ 44,457.36
	<u>Operating Expenses<sup>1</sup></u>					
6	Total salaries and wages and payroll taxes (employees only)	\$ 4,500.00	\$ 6,000.00	\$ 7,500.00	\$ 6,000.00	\$ 7,100.00
7	Outside labor expenses (non-employee)	\$ -	\$ -	\$ -	\$ -	\$ -
8	Administrative and office expenses	\$ 600.00	\$ 1,184.00	\$ 1,776.00	\$ 1,974.00	\$ 2,250.00
9	Maintenance and repair expense <sup>2</sup>	\$ 1,000.00	\$ 1,200.00	\$ 1,400.00	\$ 1,600.00	\$ 2,000.00
10	Purchased water	\$ -	\$ -	\$ -	\$ -	\$ -
11	Purchased sewerage treatment	\$ -	\$ -	\$ -	\$ -	\$ -
12	Electric power expense <sup>3</sup>	\$ 1,104.00	\$ 1,500.00	\$ 1,600.00	\$ 1,700.00	\$ 1,800.00
13	Chemical expense	\$ -	\$ -	\$ -	\$ -	\$ -
14	Testing fees	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00	\$ 200.00
15	Transportation expense	\$ -	\$ -	\$ -	\$ -	\$ -
16	Other operating expense	\$ -	\$ -	\$ -	\$ -	\$ -
17	Telemetry	\$ 1,900.00	\$ 1,900.00	\$ 1,900.00	\$ 1,900.00	\$ 1,900.00
18	Total operation and maintenance expenses (sum of Line 6 through Line 17)	\$ 9,304.00	\$ 11,984.00	\$ 14,376.00	\$ 13,374.00	\$ 15,250.00
19	Annual depreciation expense	\$ 9,855.00	\$ 9,855.00	\$ 9,855.00	\$ 9,855.00	\$ 9,855.00
20	Property taxes paid on utility property	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00
21	Franchise (gross receipts tax)	\$ 640.58	\$ 640.58	\$ 640.58	\$ 640.58	\$ 640.58
22	Annual NCUC regulatory fee	\$ 399.18	\$ 1,064.47	\$ 1,596.71	\$ 1,889.44	\$ 1,889.44
23	Total operating expenses (sum of Line 18 through Line 22)	\$ 20,448.75	\$ 23,794.05	\$ 26,718.28	\$ 26,009.01	\$ 27,885.01
	<u>Income taxes</u>					
24	Income taxes	\$ -	\$ -	\$ -	\$ -	\$ -
25	State income taxes	\$ -	\$ -	\$ -	\$ -	\$ -
26	Federal income taxes	\$ -	\$ -	\$ -	\$ -	\$ -
27	Total income taxes	\$ -	\$ -	\$ -	\$ -	\$ -
28	Net operating income	\$ (4,336.35)	\$ 4,972.35	\$ 12,171.32	\$ 18,448.35	\$ 16,572.35



29 Interest expense

30 Net Income

\$ (4,336.35) \$ 4,972.35 \$ 12,171.32 \$ 18,448.35 \$ 16,572.35

- 1. Expenses were estimated using comparisons to known expenses from similar sewer systems.
- 2. It is assumed that maintenance expense will increase due to more homes sending wastewater flow into the sewer system.
- 3. It is assumed that electric power expense will increase due to the sewer system treating more wastewater flow.