

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

IN RE:)	
)	
PETITION OF INTEGRATED RESOURCE MANAGEMENT, INC. FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY))))))	DOCKET NO. <u>23-00055</u>

**IRM UTILITY, INC.'S RESPONSES
TO TENNESSEE PUBLIC UTILITY COMMISSION'S DATA REQUESTS**

IRM Utility, Inc. ("IRM"), by and through counsel, hereby submits its Responses to the Data Requests propounded by the Utilities Division of Tennessee Public Utility Commission.

RESPONSES TO DATA REQUESTS

1. Regarding Commission Rule 1220-04-13-.17(2)(a)(4): Does IRM Utility, Inc. have any other affiliate relationships besides that of IRM – C&C? If so, please identify each such affiliate and describe the type of work done for the Utility.

RESPONSE: *No.*

2. Regarding Commission Rule 1220-04-13-.17(2)(a)(7): Please provide the approximate acreage of the proposed development.

RESPONSE: *Total area of property is 45.6 acres. The area of low-pressure pipe (LPP) construction including tanks is approximately 1.8 acres. Reserve Area A is approximately 117,000 square feet or 2.7 acres. Reserve Area B is approximately 68,000 square feet or 1.56 acres.*

3. Regarding Commission Rule 1220-04-13-.17(2)(b)(1): Provide a letter from the Union County government stating its position regarding intent/non-intent to serve the proposed development.

RESPONSE: *See attached as Exhibit 1.*

4. Regarding Commission Rule 1220-04-13-.17(2)(c)(4): Please provide proof that the party contracted to install the proposed wastewater system has a valid and current contractor's license in the State of Tennessee.

RESPONSE: *See attached as Exhibit 2.*

5. Regarding Commission Rule 1220-04-13-.17(2)(d)(1): Please provide a copy of the application for the State Operating Permit ("SOP") filed with TDEC. Include the letter from TDEC indicating the receipt of the complete application. Include any engineering and/or design reports submitted to TDEC, such as the Design Development Report and the Detailed Soils Investigation Report.

RESPONSE: *See attached as Exhibit 3.*

6. Regarding Commission Rule 1220-04-13-.17(2)(d)(2): Please provide a copy of the State Operator Certificate for the wastewater system operator of record.

RESPONSE: *See attached as Exhibit 4.*

7. Regarding Commission Rule 1220-04-13-.17(2)(e)(2): On August 11, 2023, IRM Utility, Inc. filed its income statement and balance sheet for the year ending December 31, 2022; the Company also requested this information be treated as confidential. In order to move this docket forward, please refile the information contained in the August 11, 2023 filing as non-confidential. Should the Company refuse to lift the confidentiality of this information, Staff requests that the Company provide a legal brief and/or detailed explanation as to why this information should be treated as confidential. Staff also requests that a statement of cash flows be filed for IRM Utility, Inc. for the year ending December 31, 2022 as non-confidential.

RESPONSE: *See attached as Exhibit 5 which is filed herewith absent the "confidential" designation.*

8. Regarding Commission Rule 1220-04-13-.17(2)(e)(3): Please confirm that IRM Utility, Inc. will follow the NARUC Uniform System of Accounts (USOA) for wastewater utilities.

RESPONSE: *Confirmed.*

9. Regarding Commission Rule 1220-04-13-.17(2)(e)(7): Provide a detailed breakdown of the estimated amount of contributed capital that will be recorded on the applicant's financial books, including estimated amounts for items such as land, drip fields, collection lines, etc.

RESPONSE: *See attached as Exhibit 6.*

10. Regarding Commission Rule 1220-04-13-.17(2)(e)(8): Please provide a revised tariff adding the new development (Paradise Pointe) along with the applicable rates, terms, and conditions of service for the proposed development.

RESPONSE: *IRM does not intend to change the rates, terms, and conditions of its tariff applicable to its residential and commercial customers and offers a substitute page to the tariff to include Paradise Pointe as a residential customer. See attached as Exhibit 7.*

11. Regarding Commission Rule 1220-04-13-.17(2)(e)(11): Demonstrate that the applicant has acquired a performance bond from the developer or builder of the wastewater system made payable to the Utility to ensure the construction of the wastewater system. The performance bond should be for an amount equal to or greater than the cost of the system as provided in contracts between the builder, developer and/or utility.

RESPONSE: *The performance bond has been requested but not yet issued and delivered. It will be provided upon receipt.*

12. Regarding Commission Rule 1220-04-13-.17(2)(e)(13): Please provide a financial security instrument, compliant with Commission Rule 1220-04-13-.07.

RESPONSE: *See attached as Exhibit 8.*


CERTIFICATE OF SERVICE

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

Karen H. Stachowski
Deputy Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Phone: (615) 741-2357
Fax: (615) 741-1026
E-mail: karen.stachowski@ag.tn.gov

David Foster
Director, Utilities Division
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, Tennessee 37243-0001
E-mail: david.foster@state.tn.us

On this the 20th day of October, 2023

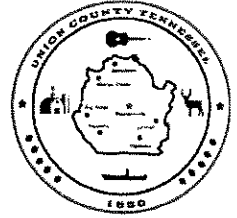


Charles B. Welch, Jr.



Jason Bailey, Ed.D.

Union County Mayor



901 Main Street
Suite 100
Maynardville, TN
37807

(865) 992-3061

October 16, 2023

To: Tennessee Public Utility Commission

Re: Paradise Pointe Development - Sharps Chapel, TN

This letter is to confirm that Union County Government does not offer any utility services to our residents. If you need any additional information, please feel free to contact my office at the number listed.

Respectfully,

A handwritten signature in black ink that reads "Jason Bailey".

Dr. Jason Bailey
Union County Mayor

EXHIBIT

1

Email: jason.bailey@unioncountyttn.gov

Website: www.unioncountyttn.gov

License Search and Verification

We are upgrading verify.tn.gov to Public Search, Please visit us here: <https://search.cloud.commerce.tn.gov/>

For best results, please limit the number of search fields. Only exact matches will be displayed. You may need to try different variations of search terms, e.g., "Smith and Smith Construction" and "Smith & Smith Construction." If any name has an apostrophe in it, please replace the apostrophe with a percent sign, entering "Smith's Auto Shop" as "Smith%s Auto Shop."

After you submit the search form, your results will appear below the form in this window (the form will remain for your reuse)...if you cannot see the results below, please scroll further down the search form.

For self-insured workers' compensation, or other reports, please submit to the [Public Record Request form](#).

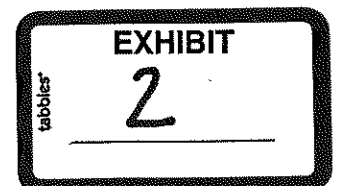
<< Click Here To Go Back To The Search Page

License Details

License Status	Active - Fully Licensed
License #	30135
License ID	30135
Expiration Date	Mar 31 2025
Original Date	Mar 31 1992
Profession Code	1501
Profession Name	Contractor
First Name	\
Middle Name	\
Last Name	CARLYLE CONSTRUCTION, LLC
City	MORRISTOWN
State	TN
Zip Code	37813
Rank	Contractor
License Activity Description	Active - Fully Licensed

Classification and Limit

CLASS	BC-A
CLASS	BC-B
MONETARY LIMIT	\$950,000.00





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

June 26, 2023

Mr. Jeffrey (Billy) Cox
owner
IRM Utilites Inc
e-copy: jeffreywcox7@gmail.com
P.O. Box 71526
Knoxville, TN 37938

Subject: **Draft of State Operating Permit No. SOP-22031**
Integrated Resource Management, Inc. (Formerly TRY WASTEWATER
SPECIALIST)
PARADISE POINTE SUBDIVISION
Sharps Chapel, Union County, Tennessee

Dear Mr. Cox:

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 Knoxville 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.

Sincerely,

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

Enclosure

cc: Permit File
Knoxville Environmental Field Office
Mr. Matt McQueen, Owner / Developer, McQueen Construction, mcqueenconstruction4746@gmail.com
Mr. Thomas Clint Harrison, P.E., Project Engineer, TCH, charrisoneng@gmail.com



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-22031

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

Integrated Resource Management, Inc. (Formerly TRY WASTEWATER SPECIALIST)
PARADISE POINTE SUBDIVISION
Sharps Chapel, Union County, Tennessee

FOR THE OPERATION OF

A publicly-owned sewage disposal system consisting of septic tank effluent pump tanks, a collection system and low pressure pipe (LPP) subsurface sewage disposal system located at latitude 36.339811 and longitude -83.803681 in Union County, Tennessee to serve approximately 35 homes in the Paradise Pointe Subdivision.

This permit is issued as a result of the application filed on June 16, 2023, in the office of the Tennessee Division of Water Resources and in conformity with approved plans, specifications and other data submitted to the Department in support of the above application, all of which are filed with and considered as part of this permit, together with the following named conditions and requirements.

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 ₅	Grab	45 mg/l	N/A	Once/Year

* 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 collection, and storage system with disposal of treated wastewater through approved subsurface sewage disposal 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 subsurface disposal 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.”

The site shall be inspected by the certified operator or his/her designee, at a minimum, once per month. in accordance with an operating and maintenance inspection schedule in the permit. The

inspection shall at a minimum evaluate the following via onsite visits or telemetry monitoring or a combination of the two:

- 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 subsurface disposal area including the location of any ponding
- the description of any corrective actions

B. MONITORING PROCEDURES

1. Representative Sampling

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.

C. DEFINITIONS

“Semi-annually” means samples are to be taken every 6 months after the first full month of operation.

“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 and be 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
Knoxville Environmental Field Office
3711 Middlebrook Pike
Knoxville, TN 37921

Sampling results may be submitted electronically to: DWRWW.Report@tn.gov.

The first operation report is due on the 15th of the month following the quarter containing the permit effective date.

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.

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 or discharge facilities required under this permit.

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. 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.

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 and collection system shall be operated under the supervision of a certified wastewater treatment 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
Knoxville Environmental Field Office
PHONE NUMBER: 1-888-891-8332**

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. 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

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 wastewater dispersal. A perpetual easement (properly recorded) may be accepted in lieu of ownership. Evidence of ownership of the treatment facility land application site(s) and/or a copy of the perpetual easement(s) must be furnished to the division for approval prior to construction of the wastewater collection and dispersal system. Signed agreements stating the intent of the existing landowner to transfer ownership may be provided to support permit issuance. Evidence of such ownership or access rights must be provided to, and approved by, the Commissioner prior to commencement of operation. Final SOP's will not be issued without establishing ownership / access rights.

Attachment 1

RATIONALE

**Integrated Resource Management, Inc. (Formerly TRY WASTEWATER
SPECIALIST)**

STATE OPERATION PERMIT NO. SOP-22031
Sharps Chapel, Union County, Tennessee

Permit Writer: Mr. Bryan Pope

FACILITY CONTACT INFORMATION:

Mr. Jeffrey (Billy) Cox
owner

Phone: (865) 712-4307

jeffreywcox7@gmail.com

SHARPS CHAPEL ROAD- 1200 Ft. SW of DR. DAVIS RD.
Knoxville, TN 37938

Activity Description: Treatment of domestic wastewater via a septic tank effluent pump collection system with Low Pressure Pipe subsurface disposal on a dedicated site. This permit authorizes operation of a publicly owned sewerage system. The utility is assuming responsibility and ownership. This activity encompasses a design to 35 homes in Paradise Pointe SD.

Facility location: Latitude 36.339811 and Longitude -83.803681

Name of the nearest stream: No discharge allowed.

Treatment system: Low Pressure Pipe dispersal with STEP / STEG.

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

Financial Security: Privately-owned public utilities provide financial security to the Public Utility Commission to comply with 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. .

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,
- Issuance of a Certificate of Convenience and Necessity (CCN) by the Public Utility Commission,
- 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.



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

August 17, 2023

Thomas Harrison, P.E.
e-copy: charrisoneng@gmail.com
T. Clint Harrison, P.E.
5123 Bethesda Road
Morristown, TN 37814

Subject: **Project: Paradise Pointe- STEP with LPP**
County: Union
Wastewater Project Number: 23.025

Dear Mr. Harrison:

The Tennessee Department of Environment and Conservation, Division of Water Resources, acknowledges the receipt of your construction documents on May 15, 2023.

The project consists of a new 37 lot single family s/d on about 45 acres in Union Co, TN. New STEP design (4,855 LF of 2"PVC) to transport effluent sewer from each home to a central spot with dosing tanks that feed the effluent into an LPP system.

Approval is granted in accordance with certain requirements of the Water Quality Control (WQC) Act of 1977 and Regulations of the Water Quality Control Board. **On the coversheet(s) of the site's set of plans and specifications, an approval date and its expiration date will be stamped by the division. Any indication of tampering with the bound set of documents will be subject to investigation and prosecution.** One complete set of construction documents, bearing the official stamp, must be kept at the construction site.

Approval expires one year from the stamped approval date (August 17, 2023) unless construction is either underway or complete. Any request for extension must be made prior to this expiration date. Significant deviations from the approved plan documents must be submitted and approved in writing before such changes are made. Minor changes made during construction need not have prior written approval. Modifications, however, may be required by this Department should the changes be deemed inappropriate. It is advisable, therefore, to obtain prior approval in cases where the significance of the change is uncertain.

The Division of Water Resources is authorized to inspect the construction work to verify compliance with the approved plans and specifications, which are on the site. Therefore, the engineer shall notify our staff at the Knoxville Environmental Field Office by calling (865) 594-6035 before the start of construction.

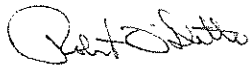
Approval of these construction documents should not be construed as a permit for any activities related to this project. Activities which may require a permit under the WQC Act and Regulations include, but are not limited to, the following: streambank vegetation removal; creek crossing(s) for equipment or utility lines; construction within twenty (20) feet of a stream bank; construction in or near a marshy area or wetland, and/or land disturbance equal to or greater than one acre. Additionally, this approval does not authorize connection and use of sewer that will cause or contribute to collection system overflow or overload of receiving wastewater treatment facility.

The Knoxville Environmental Field Office should also be contacted for determinations regarding whether modification of the existing NPDES or SOP permit, an Aquatic Resource Alteration Permit (ARAP) and/or a National Pollutant Discharge Elimination System (NPDES) construction stormwater permit will need to be obtained prior to the beginning of construction of this project.

The division's most recent TDEC Technical/Engineering Documents, including "*Design Criteria for Review of Sewage Works Construction Plans and Documents*", Chapters 1-17, of November 1, 2017, is available on our website: <https://www.tn.gov/environment/program-areas/wr-water-resources/water-quality/water-quality-reports---publications.html>.

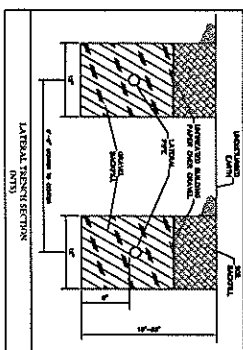
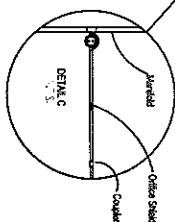
To expedite matters, please reference the assigned wastewater project number **23.0250** on any future correspondence. If you have any questions, please feel free to contact me at (615) 681-3339 or by email at Robert.Odette@tn.gov.

Sincerely,

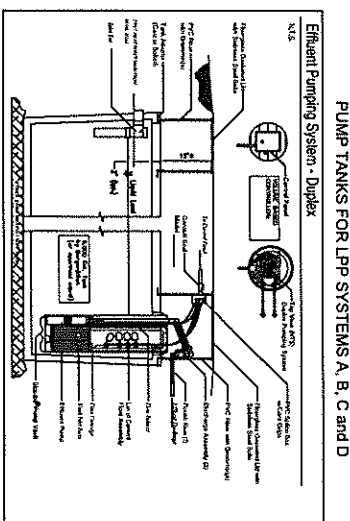
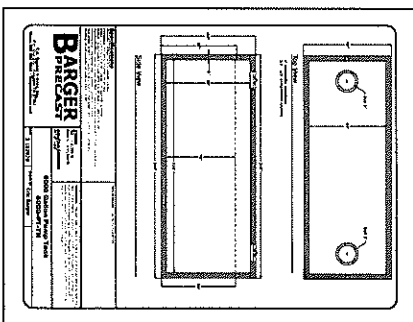
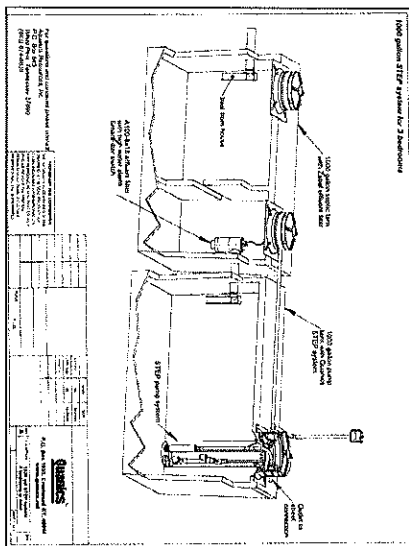


Robert G. O'Dette, M.S., P.E. BCEE
WEF Fellow
Engineering Services Unit

cc: Water-Based Systems File
Tony Younce, tryounce@gmail.com
Mr. Michael J. Atchley, Unit Manager, TDEC Division of Water Resources, Michael.Atchley@tn.gov



PUMP TANK



CALCULATIONS

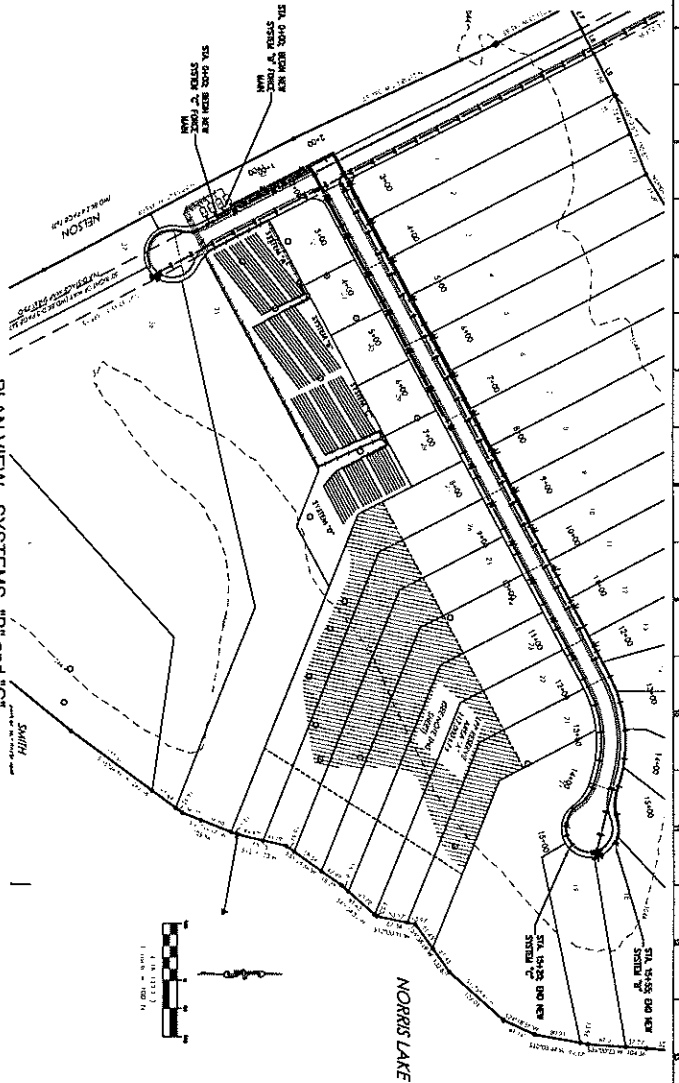
FOR APPROXIMATE MOISTURE CALC. USE THE FOLLOWING FACTORS:

1.000000 MOISTURE FACTOR FOR ALL MOIST SAMPLES
0.980000 MOISTURE FACTOR FOR ALL DRY SAMPLES

$9 \text{ inches} \times \frac{1}{2} = 4.5 \text{ FEET SAMPLE LENGTH (FV)} \times .20$
= .90 FEET SAMPLE LENGTH

MOIST CALC. EXAMPLE: PER. MOIST IN MOIST TUBES = .0075
4.500000 FT. OF TUBE AT 20.000000 MOIST LOSS = .27 FT.
20 TOTAL LOSS = .77 FT.

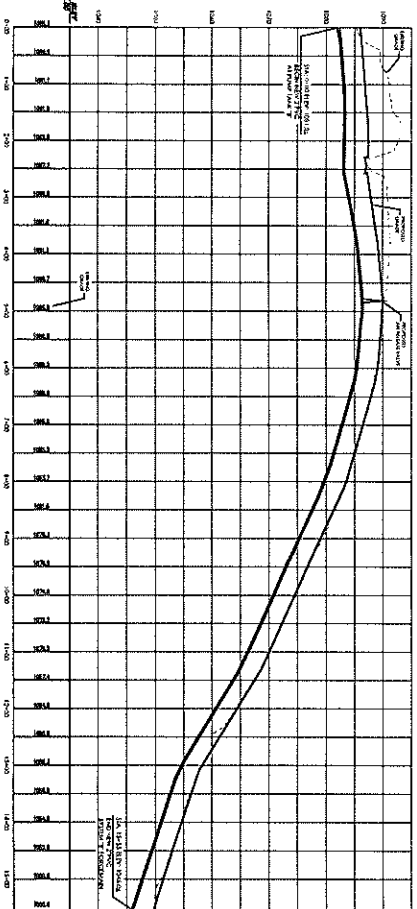
BE QUICK! 1-800-555-5555 TRIMBLE MOIST LOSS. 2000-00-79715
CALL 800-555-5555 OR VISIT US AT WWW.2000-00-79715.COM
OR E-MAIL US AT 2000-00-79715@2000-00-79715.COM
OR VISIT OUR WEBSITE AT WWW.2000-00-79715.COM



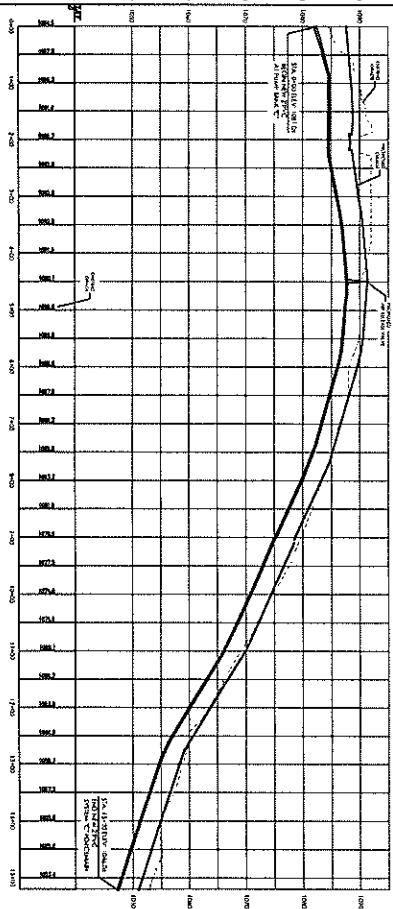
PLAN VIEW - SYSTEMS "B" and "C"

PROFILE
HORIZONTAL SCALE: 1"=100'
VERTICAL SCALE: 1"=10'

PROFILE VIEW - SYSTEM "B"



PROFILE VIEW - SYSTEM "C"



C-7.1

SEWER
PLAN & PROFILE

A NEW SINGLE FAMILY RESIDENTIAL DEVELOPMENT:
PARADISE POINT
SHARPS CHAPEL ROAD
SHARPS CHAPEL, TENNESSEE
DEVELOPER: T. PHILIP CARLYLE - 296 BOYDS SCHOOL ROAD
MORRISTOWN, TENNESSEE 37813

PROJECT NO. 22-000000	DATE 04-10-2022
DESIGNER TCHP	DATE 04-10-2022
REVISION HISTORY	
04-09-2022	REVISION 1
04-13-2022	REVISION 2
04-07-2022	REVISION 3
04-14-2022	REVISION 4
04-14-2022	REVISION 5
04-14-2022	REVISION 6
04-14-2022	REVISION 7
04-14-2022	REVISION 8
04-14-2022	REVISION 9
04-14-2022	REVISION 10
04-14-2022	REVISION 11
04-14-2022	REVISION 12
04-14-2022	REVISION 13
04-14-2022	REVISION 14
04-14-2022	REVISION 15
04-14-2022	REVISION 16
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04-14-2022	REVISION 18
04-14-2022	REVISION 19
04-14-2022	REVISION 20
04-14-2022	REVISION 21
04-14-2022	REVISION 22
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04-14-2022	REVISION 98
04-14-2022	REVISION 99
04-14-2022	REVISION 100



TCHP
T. CLINT HARRISON, P.E.
3112 S. HARRISON ROAD
MORRISTOWN, TN 37813
PH: 423.277.1115
clharrison@tchp.com

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
WATER AND WASTEWATER OPERATOR CERTIFICATION BOARD

I.D. NO.
3505

EXPIRATION DATE
12/31/2023

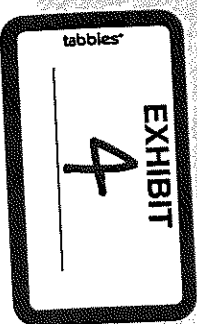
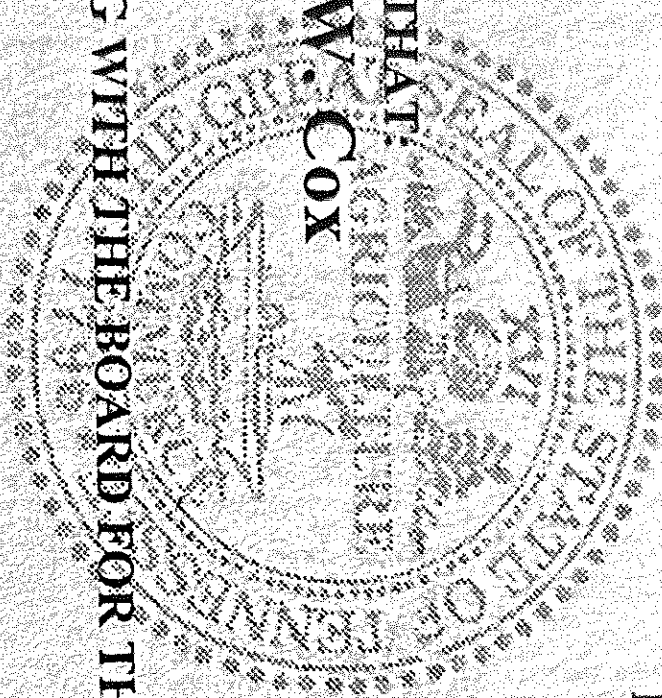
THIS IS TO CERTIFY THAT:

Jeffrey W. Cox

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

CS1

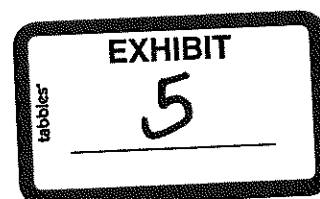
WHEN CORRESPONDING ALWAYS REFER TO YOUR I.D. NUMBER
AND SEND NOTIFICATION OF ADDRESS CHANGE



11:36 AM
06/02/23
Cash Basis

Integrated Resource Management, Inc.
Profit & Loss
January through December 2022

	Jan - Dec 22
Ordinary Income/Expense	
Income	
400 · Operating Revenue	
212 · Commercial Revenues	
521.5 · Commercial with Food	10,912.00
521.6 · Commercial without Food	257,047.78
Total 212 · Commercial Revenues	267,959.78
521.1 · Residential Revenues	
5211.04 · Emory Pointe	16,935.99
5211.05 · Compass Pointe	6,138.57
5211.07 · Wild Briar	1,540.00
5211.09 · Sterling Springs	16,624.66
5211.15 · Flat Hollow	5,238.55
5212.01 · Cove Mountain Realty	3,669.38
5212.02 · Valley Mart Exxon	5,538.00
5212.03 · Lot 23 Rivewr Club	1,584.00
5212.17 · Lost Creek Campground	15,587.70
5212.18 · Mountain Shangrila	4,560.00
5221.20 · Cove Creek	3,379.02
5221.21 · Riverstone Estates	25,376.96
5221.22 · Waterside on Douglas Lake	20,959.28
521.1 · Residential Revenues - Other	5,344.79
Total 521.1 · Residential Revenues	132,476.90
400 · Operating Revenue - Other	3,678.15
Total 400 · Operating Revenue	404,114.83
Total Income	404,114.83
Gross Profit	404,114.83
Expense	
421 · Non Utility Income	
421.07 · Wild Briar	141.00
Total 421 · Non Utility Income	141.00
700 · Operating Expenses	
775.90 · Other Miscellaneous Exp	
775.91 · Miscellaneous Exp	1,010.34
Total 775.90 · Other Miscellaneous Exp	1,010.34
60400 · Bank Service Charges	454.50
63400 · Interest Expense	849.09
66700 · Professional Fees	4,200.00
68400 · Travel Expense	992.00
715 · Purchase Power	
715.04 · Emory Pointe	1,076.01
715.05 · Compass Pointe	554.26
715.07 · Wild Briar	2,367.09
715.09 · Sterling Springs	2,963.99
715.10 · MT SHANGRILA WAY	1,037.41
715.11 · FLAT HOLLOW	761.28
715.12 · RIVERSTONE	
715.12A · MARINA WAY	324.73
715.12B · ADAM LOOP	331.67
715.12C · JENNIFER LANE	439.16
Total 715.12 · RIVERSTONE	1,095.56
715 · Purchase Power - Other	1,057.24
Total 715 · Purchase Power	10,912.84



11:36 AM
06/02/23
Cash Basis

Integrated Resource Mangement, Inc.
Profit & Loss
January through December 2022

	Jan - Dec 22
720 · Material & Supplies	
720.001 · Office Supplies	611.84
Total 720 · Material & Supplies	611.84
731 · Contractual Services - Profess	
731.96 · Engineering Services	1,200.00
731.91 · Professional Services	450.00
731.92 · Legal Services	19,500.00
731.93 · Accounting	23,321.07
731.94 · Consulting	359,444.25
Total 731 · Contractual Services - Profess	403,915.32
736 · Contractual Services - Other	
736.02 · Computer Repairs	6,464.58
736 · Contractual Services - Other - Other	500.00
Total 736 · Contractual Services - Other	6,964.58
750 · Transportation Expense	
750.2 · Auto Maintenance	50.00
Total 750 · Transportation Expense	50.00
775 · Miscellaneous	
775.11 · Travel	472.65
775.13 · Entertainment	11.88
775.15 · Telephone Exp	5,891.56
775.45 · Office Machine Maintenance	1,551.95
775.55 · Licenses & Permits	
775.551 · Annual Report	1,419.13
775.55 · Licenses & Permits - Other	1,744.00
Total 775.55 · Licenses & Permits	3,163.13
775.84 · Advertising/Promotional	266.06
775.87 · F & E Tax	1,800.00
Total 775 · Miscellaneous	13,157.23
776 · Propert Tax	
776.01 · Dectur County	2,258.00
776.02 · Blount County	269.00
776 · Propert Tax - Other	2,388.30
Total 776 · Propert Tax	4,915.30
Total 700 · Operating Expenses	448,033.04
Total Expense	448,174.04
Net Ordinary Income	-44,059.21
Other Income/Expense	
Other Income	
403 · Interest Income	4.72
Total Other Income	4.72
Net Other Income	4.72
Net Income	-44,054.49

11:37 AM
06/02/23
Cash Basis

Integrated Resource Management, Inc.
Balance Sheet
As of December 31, 2022

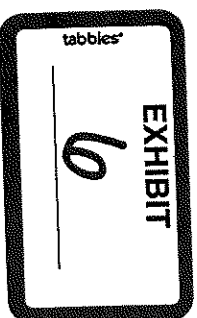
	Dec 31, 22
ASSETS	
Current Assets	
Checking/Savings	
131 · Operating Accounts	
131.03 · NFB - Douglas Land Reserve Acct	254,117.95
131.04 · 1st Horizon Primary Check (7405)	783.01
131.05 · 1st Horizon 2nd Acct (5221)	13,655.59
Total 131 · Operating Accounts	268,556.55
132 · Special Deposit	
132.06 · 1st Horizon Escrow 4321	4,443.09
132.07 · 1st Horizon Sec Deposit 4251	1,654.69
Total 132 · Special Deposit	6,097.78
Total Checking/Savings	274,654.33
Total Current Assets	274,654.33
Fixed Assets	
101T · Utility Plant in Service	
351T · Organization	
351.00T · Organization Enterprise	66,553.00
351.07T · Organization Wild Briar	575.00
351.10T · Organization Mtn Shangrilla	400.00
351.11T · Organization - Mtn Reflections	390.00
351.12T · Organization - Lost Creek	550.00
351.13T · Organization - Bird's Breck	6,000.00
351.14T · Organization - Ahley Meadows	2,875.00
Total 351T · Organization	77,343.00
353T · Land & Land Rights	
353.00T · Land Enterprise	30,763.00
353.04T · Land - Emory Point	55,600.00
353.05T · Land - Compass Point	940.00
353.07T · Land - Wild Briar	2,100.00
Total 353T · Land & Land Rights	89,403.00
363T · Customer Service	
363.04T · Customer Service - Emory Point	45,000.00
Total 363T · Customer Service	45,000.00
364T · Flow Measuring Devices	
364.00T · Flow Measure - Enterprise	444.91
364.04T · Flow Measure - Emory Point	1,402.14
364.05T · Flow Measure - Compass Point	398.87
364.07T · Flow Measure - Wild Briar	219.67
364.09T · Flow Measure - Sterling Springs	1,200.00
Total 364T · Flow Measuring Devices	3,665.59
380T · Treatment & Disposal Equip	
380.04T · Emory Point	210,000.00
380.05T · Compass Point	130,000.00
380.09T · Sterling Springs	380,000.00
380T · Treatment & Disposal Equip - Other	170,000.00
Total 380T · Treatment & Disposal Equip	890,000.00
389T · Plant & Misc	
389.00T · Enterprise	1,126.48
389.01T · Hardware & Software	8,802.00
Total 389T · Plant & Misc	9,928.48

11:37 AM
06/02/23
Cash Basis

Integrated Resource Mangement, Inc.
Balance Sheet
As of December 31, 2022

	Dec 31, 22
108T · Accumulated Depreciation	-524,106.14
Total 101T · Utility Plant in Service	591,233.93
Total Fixed Assets	591,233.93
TOTAL ASSETS	865,888.26
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Credit Cards	
131.09 · IRM Visa Payable	5,795.21
Total Credit Cards	5,795.21
Other Current Liabilities	
235 · Customer Deposits	1,593.67
235.03 · Customer Deposits - Dougl's Land	254,117.95
Total Other Current Liabilities	255,711.62
Total Current Liabilities	261,506.83
Long Term Liabilities	
271 · Contribution in Aid of Const.	1,115,340.00
272 · Accum Amort. of Contributions	-524,106.07
Total Long Term Liabilities	591,233.93
Total Liabilities	852,740.76
Equity	
201 · Common Stock	1,000.00
215 · Retained Earnings	56,201.99
Net Income	-44,054.49
Total Equity	13,147.50
TOTAL LIABILITIES & EQUITY	865,888.26

June 27th 2023 - Paradise Pointe Cost Breakdown				
	Collection	Dosing	LPP	Total
Materials	\$ 29,750.00	\$ 118,950.00	\$ 43,450.00	\$ 192,150.00
Labor/Machines/Fuel	\$ 29,100.00	\$ 46,750.00	\$ 86,500.00	\$ 162,350.00
20% Contingency	\$ 11,770.00	\$ 33,140.00	\$ 25,990.00	\$ 70,900.00
Total	\$ 70,620.00	\$ 198,840.00	\$ 155,940.00	\$ 425,400.00
Total Less Contingency	\$ 58,850.00	\$ 165,700.00	\$ 129,950.00	\$ 354,500.00



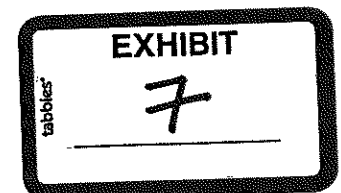
Wastewater Utility Service

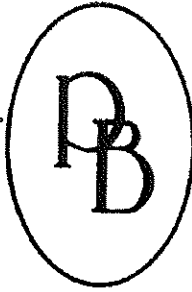
RESIDENTIAL SEWER SERVICE TERRITORIES

<u>Service Territory</u>	<u>County</u>	<u>TRA Docket No.</u>	<u>Rate Class</u>
Emory Pointe	Roane	04-00101	Rate Class 1
Wild Pear Shores	Jefferson	04-00153	Rate Class 1
Compass Pointe	Blount	04-00266	Rate Class 1
Wild Briar Ridge★	Sevier	05-00056	Rate Class 1
Sterling Springs★	Sevier	05-00055	Rate Class 1
Mountain Shangrila★	Sevier	06-00156	Rate Class 1
Flat Hollow★	Campbell	07-00009	Rate Class 1
Ashley Meadows	Blount	07-00008	Rate Class 1
			T
Riverstone Estates★	Decatur	09-00099	Rate Class 1
			T
Paradise Pointe	Union	23-00055	Rate Class 1
★ Combined residential and commercial territories.			T

Issued: February 8, 2016

Effective: February 8, 2016





PEOPLES BANK

129 MAIN STREET • P.O. BOX B, CLIFTON, TENNESSEE 38425
(931) 676-3311 • FAX (931) 676-5110

LETTER OF CREDIT

Tennessee Public Utilities Commission
502 Deadrick Street
Nashville, Tennessee 37243

REFERENCE: Integrated Resources Management, Inc.
Dba IRM Utility, Inc.
Company ID#:128825
Irrevocable Letter of Credit#:1416726
Effective Date: June 28, 2023

Sir/Madam:

You have requested of Peoples Bank, (hereinafter called the "Lender") that we establish an irrevocable letter of credit which will remain available on behalf of Integrated Resources Management, Inc. dba IRM Utility, Inc., (hereafter the "Company") who has applied to the Tennessee Public Utilities Commission (the "Commission") for authority to provide public wastewater services in the State of Tennessee. The purpose of this letter of credit is to secure payment for any monetary obligation imposed against the Company, its representatives, successors or assigns, in any contested case proceeding brought under Tenn. Comp. R. & Regs. Chapter 1220-4-13 by or on behalf of the Commission.

We hereby establish and issue, in favor of the Commission, an irrevocable letter of credit in the amount of two hundred and fifty thousand dollars (\$250,000.00) lawful money of the United States of America. Upon entry of an order that finds a monetary obligation pursuant to Chapter 1220-4-13, the Commission may draw upon this letter of credit, at any time and from time to time, by delivering a Letter of Credit Notice, substantially in the form set forth below ("Notice"), which Notice shall specify the amount (the "Draw Amount") to be drawn and the account (the "Bank Account") to which the Draw Amount should be delivered, and shall be signed by an official designated and duly authorized by the Commission, to Lender at the address listed below, or to such other address as the Lender shall notify the Commission in writing by certified mail. Promptly after the delivery of each Notice, the Lender hereby covenants and agrees to deliver, by wire transfer of immediately available funds, the Draw Amount to the Bank Account.

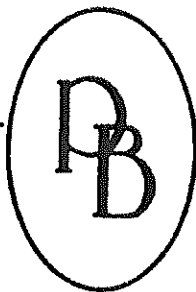


ESTABLISHED 1890

EXHIBIT

8

tabbies



PEOPLES BANK

129 MAIN STREET • P.O. BOX B, CLIFTON, TENNESSEE 38425
(931) 676-3311 • FAX (931) 676-5110

This letter of credit shall be deemed automatically renewed without amendment for successive one-year periods and may be canceled by the Lender by giving thirty (30) days advance written notice by certified mail of such cancellation to the Commission and the Company, it being understood that the Lender shall not be relieved of liability that may have accrued under this letter of credit prior to the date of cancellation.

Failure to renew this letter of credit shall allow the Commission to draw upon it without the necessity of the Commission being required to hold a hearing concerning the Principal's operation or Certificate of Public Convenience and Necessity. In such an event and upon a directive from the Commission, the Lender hereby covenants and agrees to deliver by wire transfer of immediately available funds the maximum sum of this letter of credit to the Bank Account to enable the continued operation of the public wastewater utility.

The Lender hereby represents and warrants that it is qualified and authorized to issue this letter of credit and is a bank designated by the Treasurer of the State of Tennessee as an authorized depository bank for the deposit of state funds.

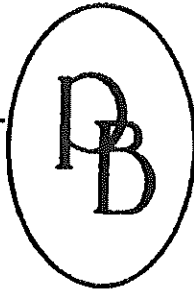
Except as otherwise expressly stated, this letter of credit is subject to the Uniform Customs and Practice for Documentary Credit (1993 Revision) International Chamber of Commerce Publication No. 500, or any revisions thereto.

Very Truly Yours,

PEOPLES BANK
Kelvin Runions
Chief Lending Officer
P O Box B
Clifton, TN 38425



ESTABLISHED 1890



PEOPLES BANK

129 MAIN STREET • P.O. BOX B, CLIFTON, TENNESSEE 38425
(931) 676-3311 • FAX (931) 676-5110

APPROVAL AND ENDORSEMENT

This is to certify that I have examined the foregoing letter of credit and found the same to be sufficient and in conformity to law and that the same has been filed with the Tennessee Public Utilities Commission, State of Tennessee, this 28th day of June, 2023. This will increase the letter of credit from \$150,000 to \$250,000.

Kelvin Runions
Chief Lending Officer



ESTABLISHED 1890