

October 30, 2025

VIA ELECTRONIC FILING

Electronically Filed in TPUC Docket
Room on October 30, 2025 at 3:26p.m.

Shilina B. Brown
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Consumer Advocate Division
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RE: *Application of Limestone Water Utility Operating Company, LLC, to Expand its Certificate of Convenience and Necessity to Serve the Campbell Hollow Subdivision, TPUC Docket No. 25-00057*

Dear Ms. Brown:

We are in receipt of your inquiry and requests regarding the minimum filing requirements in the above-referenced docket. Please find the responses from Limestone Water Utility Operating Company, LLC (“Limestone”) below.

Rule 1220-04-13-.17(2)(a) General Information

1. ***Rule 1220-04-13-.17(2)(a)2.*** The rule requires an organizational chart showing each officer and key personnel by name and title. The Company filed Exhibit 5. This is an organizational chart but there are only titles, and no names are listed for each position as required by the rule. File a complete organizational chart replacing Exhibit 5 with a complete chart of employee names with each title in the Docket.

Response: Please see Attachment “DR 1 – Limestone Org Chart” for an updated organizational chart showing each officer and key personnel by name and title. Please see Exhibit 8 to the Application.

2. ***Rule 1220-04-13-.17(2)(a)7.*** The rule requires a complete description of the geographic territory to be served by the applicant, including the name and location of development (subdivision) and the number of acres. Include the name of the subdivision or development and the name of the wastewater system as stated in the

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TDEC permit. In addition, provide a legible map of the area with the proposed service territory clearly and accurately plotted. There are internal inconsistencies regarding the Campbell Hollow development. The Petition (p. 4) states it is “a subdivision containing 10 lots located on approximately 20.47 acres. It is plotted for one home per lot.” The SOP Application (Exhibit 21) states that the development is a subdivision consisting of 10 homes with an average of 14 bedrooms per home. In the Direct Testimony of Todd Thomas (Exhibit 9), his description follows that of the Petition and states consisting of “10 homes with a total of 14 bedrooms per home.” Confirm that the development is that of 10 buildings of an apartment complex. If not apartments, please describe the development. A copy of the draft permit from the TDEC dataviewer is attached as “CA MFR Review Exhibit 1 - draft SOP.”

Response: Limestone has confirmed that the Campbell Hollow development will be 10 homes that consist of 14 bedrooms per home.

- 3. Rule 1220-04-13-.17(2)(a)7(ii-iii).** The rule asks for names of surrounding streets and roads; and the rule asks for a map to show access roads and names of access roads (if available) and the other utilities necessary to provide wastewater service. Exhibit 1 is a map, but it does not include all surrounding road names and properties. File an exhibit to show these requirements in the Docket.

Response: Please see Attachment “DR 2 – Campbell Hollow Map.”

- 4. Rule 1220-04-13-.17(2)(a)7(iv).** The rule asks for a map of all residences and habitable structures served by the wastewater system. Exhibit 1 is a map, but it does not include a map of the residences and habitable structures. File a map that shows the details of this requirement in the docket.

Response: Please see Attachment “DR 2 – Campbell Hollow Map.”

- 5. Rule 1220-04-13-.17(2)(a)8.** The rule asks for description of the type of proposed wastewater system to be constructed including the design capacity and the maximum potential number of customers the utility will service in the proposed service area. Indicate the technology used for the system (e.g., membrane, sand filter, wetland cell and/or lagoon). The type of system and design capacity should match the type and design capacity of the associated TDEC permit and permit application. The Petition states 10 lots with one home per lot, but the SOP application states 10 homes with 14 bedrooms each. Confirm if there will be 10 homes or 10 apartment complexes.

Response: Limestone has confirmed that this development will be 10 homes.

6. **Rule 1220-04-13-.17(2)(a)9.** The rule asks for estimated dates for the commencement and completion of the construction of the system and the estimated date the wastewater system will be placed into service. If the system will be constructed or placed into service in phases, provide the anticipated dates for each phase. The Petition states on pg. 2 of Appendix A “an estimated commencement date soon after Commission approval and an estimated completion date of August 2025.” Confirm that construction will be completed in August 2025.

Response: Limestone has reached out to the developer to confirm when construction will be completed. Once this information has been provided, the Company will supplement that information.

7. **Rule 1220-04-13-.17(2)(a)11.** The rule asks to identify the builder or developer that has requested the utility to provide wastewater service. Include name of company, name of primary contact, title, mailing address, email address, and phone number. The Consumer Advocate has reviewed all filings and there are some inconsistencies with developer and contractor information. This rule asks for certain information, and not all was provided. Please file in the Docket the name of the company that Mr. Howell works for and include his title.

Response: Limestone has confirmed that Mr. Howell works for HB South, and he is the Developer of the Campbell Hollow Subdivision.

Rule 1220-04-13-.17(2)(b) Property Rights - Public Need

1. **Rule 1220-04-13-.17(b)(3).** The rule asks for all contracts or agreements between the builder(s) of the treatment and/or collection system, the utility, and the property and/or subdivision developer that show entitlement or ownership to the land, system specifications, costs for the wastewater system, timeline for the system to be built, and rights to the system once it is completed. Documents presented by the applicant should be signed by all parties and bear marks or stamps, such as those provided by notaries or public officials, as necessary. Exhibit 22 is the signed contract between the developer, Wade Howell, and Limestone. Exhibit 20 is the contractor’s license for DSH. In Mr. Thomas’ testimony at 15:3, he states that the facility is to be constructed by Mr. Howell. It is not clear whether Mr. Howell is the developer or the contractor to build the system. File a copy of the contract between Limestone (or Wade Howell) and DSH in the Docket.

Response: Mr. Howell is the developer of the system. Limestone has reached out to the developer for this information. Once this information has been provided, the Company will supplement that information.

Rule 1220-04-13-.17(2)(c) Managerial Ability

1. **Rule 1220-04-13-.17(2)(c)3.** The rule asks for copies of all contracts related to any pending merger or acquisition of the applicant, corporate parent or affiliate. Has Limestone obtained a waiver from the Commission for the requirements of this rule?

Response: In the Application, Limestone maintained that it has complied with this rule. In the alternative, Limestone requested a waiver.

2. **Rule 1220-04-13-.17(2)(c)4.** The rule asks for proof that the party contracted to install the proposed system has a valid and current contractor's license by the applicable licensing board of the State of Tennessee. Exhibit 20 is the DSH contractor's license. In Thomas' Testimony at 15 line 3 he states: "Through the operation of the wastewater facility to be constructed by Mr. Howell." Confirm who the developer is and who the contractor is. If Mr. Howell is the contractor, file his license in the Docket.

Response: The contractor of the development is DSH Associates. Their contractor's license has been provided as Exhibit 20 to the Application.

Rule 1220-04-13-.17(2)(d) Technical Capability

1. **Rule 1220-04-13-.17(2)(d)1.** The rule asks for a copy of the application for the State Operating Permit (SOP) filed with TDEC. Include letter from TDEC indicating the receipt of a complete application. Include any engineering and/or design reports submitted to TDEC, such as the Design Development Report and the Detailed Soils Investigation Report. If an operating permit has been issued, provide a copy of the permit. The utility shall file a copy of the TDEC permit in the docket file prior to providing service. After a review of Petition the Consumer Advocate could not locate copy of the engineer reports and/or design reports. A draft permit has been issued and by TDEC is attached as "CA MFR Review Exhibit 1 - Draft SOP." [NOTE: this is in Staff's DR 1]

Response: Please see Attachment "DR 3 – Campbell Hollow Site Plans."

2. **Rule 1220-04-13-.17(2)(d)2. The rule asks for a copy of the State Operator Certificate for the wastewater system operator of record. If the operator is a contract employee of the utility, provide a copy of the employment contract.** A copy of the license for Dana Douglas was attached as Exhibit 19. However, after review of the Petition the Consumer Advocate cannot locate a copy of a contract for Dana Douglas. In review of documents available in the TDEC Dataviewer, the Consumer Advocate found an email from Limestone dated January 15, 2025, which states that Dana Douglas is no longer with the Company. A copy of this email is attached as “CA MFR Review Exhibit 2 - Dana Jackson.” Confirm that Dana Jackson is the certified operator, and who employs him. If Mr. Jackson is an employee of a third party, please share a copy of the contract. [NOTE: this is in Staff’s DR 1]

Response: Limestone has determined that Dana Douglas will not be the certified operator of this system. Please see **Attachment “DR 4 – State Operator Certificate”** for a copy of the certified operator, employed by West Creek.

3. **Rule 1220-04-13-.17(2)(d)4. The rule asks for a list of any complaint(s), notices of violation or administrative action filed with or issued by a regulatory agency. Identify the nature of the complaint notices of violation or administrative action, which agency is involved, and how the issue was or is being resolved.** The Company provided no information in response to this requirement. Therefore, the Consumer Advocate reviewed TDEC’s public dataviewers for information and found the following (A copy of all the documents or screen shots are attached collectively as “CA MFR Review Exhibit 3 - Complaints & Enforcement”):

- Candlewood Lakes Drinking Water System.
 - 2025.02.05 - Settlement Agreement (still active).

- Shiloh Falls Wastewater System
 - 2025.03.27 - Compliance Evaluation Inspection & Notice of Violation - saturation and runoff.
 - 2025.04.15 -Limestone Response to NOV.
 - 2025.04.17 - Limestone Corrective Action Plan (CAP)- deadline of 6/1/2025 for final design plans to be submitted.
 - 2025.04.21 -TDEC Letter confirming receipt of CAP.
 - 2025.08.01 - TDEC NOV (failure to follow CAP - no final design plans submitted).

- Grassland Wastewater System (Cartwright Creek).
 - 2023.02.13 - WPC22-0086-TDEC Consent Order (still active).
 - 2025.07.16 - Notice of Incomplete Permit Application.
 - 2025.07.23 - Limestone email to TDEC about Permit application with attachment (permit).

- 2025.07.25 -Notice of Violation-Release of Sewage.
- 2025.07.29 - Limestone Response to NOV.
- Note: Multiple Citizen Complaints - screen shots of complaints filed with TDEC provided in collective exhibit.
- 2025.07.25 -Email about Grasslands SSO & Photos.
- 2025.07.29- Limestone Response to NOV.
- 2025.08.13 - July 2025 Monthly Operation Report (MOR) - non-compliance with permit limits for CBOD5 (daily \leq 10mg/L) and Ammonia N (daily \leq 4mg/L).
- Hideaway Wastewater System (Cartwright Creek).
 - 2024.11.18 - Notice of BOD Exceedance.
 - 2025.05.20 WPC23-0125 Director's Order Assessment (civil penalties assessed)
- Laurel Creek.
 - 2025.07.02- Final Inspection Letter- Plans not followed. Need corrected as-built plan filed.

Response: Please see Attachment “Limestone NOVs.”

Candlewood Lakes - Limestone has included the Settlement Order in the provided attachment. Limestone is working on setting up a meeting with TDEC to discuss the well drillers not being named.

Shiloh Falls – Limestone had a meeting regarding the CAP on 8/21/2025. Limestone submitted final plans to satisfy the CAP on 9/12/2025.

Grasslands – This system has reached the end of its useful life, and Limestone is working to complete a total replacement of the system.

Hideaway – Please see the currently active agreement extension to address past exceedances in the provided attachment. Limestone's third-party engineering firm is planning to submit their engineering report by 10/31/2025.

Laurel Creek – Corrected as-built plans filed 7/3/2025 and Limestone closed on this system 7/10/2025.

Rule 1220-04-13-.17(2)(e) Financial Capability

1. ***Rule 1220-04-13-.17(2)(e)2.*** The rule asks for proforma income statements for the wastewater utility for the first three (3) years of operations or for an expanded amended CNN, the first three years after the latest year-end financials. In the calculations of utility revenues show the number of consumers and the rates used in the calculations. Show operation and maintenance expenses by account number and

provide the basis and/or assumptions used to arrive at these amounts. The Consumer Advocate reviewed Exhibit 12 and the schedule does not include O&M account numbers or the assumptions. File corrected Exhibit 12 in the Docket.

Response: Please see Attachment “DR 5 – Updated Pro Forma.”

2. **Rule 1220-04-13-.17(2)(e)6.** The rule asks for the total estimated detailed cost of construction of the wastewater system to be constructed for the proposed service area. **If the wastewater system will be constructed in phases, provide detailed construction cost estimates for each phase. Indicate whether the developer or the applicant will pay for the construction of the system.** The Consumer Advocate could not locate in Confidential Exhibit 18 an indication of whether the developer (Wade Howell) or applicant will pay for construction. DSH is mentioned in the exhibit and not Wade Howell. Please, provide the required information and confirmation that per the exhibit there will be 140 rooms in the 10 homes. Also, provide any spreadsheet in the native Excel format.

Response: The developer will pay for construction of the system. Limestone has confirmed that there will be 140 rooms in the 10 homes. Please see Exhibit 18 provided in the original filing for detailed costs of construction of the system.

3. **Rule 1220-04-13-.17(2)(e)9.** The rule asks for estimates of costs and customers added by month for the first five (5) years based upon the construction build-out schedule for developers in the service area of the proposed wastewater system. **For each year, by month, provide an estimated number of customers by customer class anticipated to be served by the wastewater system. Include the utility’s basis and assumptions used for this projection. Provide this information in a spreadsheet in Microsoft Excel format with all assumptions clearly documented.** The Company states that since the development is in one phase, this requirement is not applicable. Confirm the number of customers. Is it 10 or 140?

Response: Limestone has confirmed that the development will consist of 10 customers. Please see Exhibit 12 to the Application.

4. **Rule 1220-04-13-.17(2)(e)11.** This rule requires a performance bond from the developer or builder of the wastewater system made to ensure 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 builder, developer and/or utility.** In the Petition’s Appendix, the Company states that it has funding from CSWR, if it is needed. This response does not appear to comply with the intent of the rule

which is to ensure that the Company and its ratepayers are left with the funding to complete a system. Provide a copy of a performance bond from the developer. **[NOTE: this is in Staff's DR 1]**

Response: Limestone has requested this information from the developer. Once this information has been provided, the Company will supplement this information.

4. **Rule 1220-04-13-.17(2)(e)12. The rule asks for a list of all funding sources available to the applicant for the wastewater system proposed by the applicant.** In the Petition, page 5 of Appendix A, it states the developer will fund all necessary construction and will provide assurance in the form of the bond as soon as available. Provide the missing Exhibit or provide an estimate of the date in which the bond will be provided.

Response: Limestone has requested this information from the developer. Once this information has been provided, the Company will supplement this information.

Rule 1220-04-13-.17(2)(f) Sworn Testimony

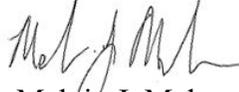
1. **Rule 1220-04-13-.17(2)(f)1. The rule asks for evidence that public need exists for the wastewater services in the proposed service area.** Exhibit 9, in Testimony at 14-15 the statement is not sufficient. It is the opinion of Mr. Thomas and lacks evidence of need.

Response: Limestone's Application satisfies the Commission's rule. The Campbell Hollow Subdivision development is a completely new development from the ground up. The need for wastewater service has not existed prior to the development since there were no habitable areas.

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

Very truly yours,

BUTLER SNOW LLP

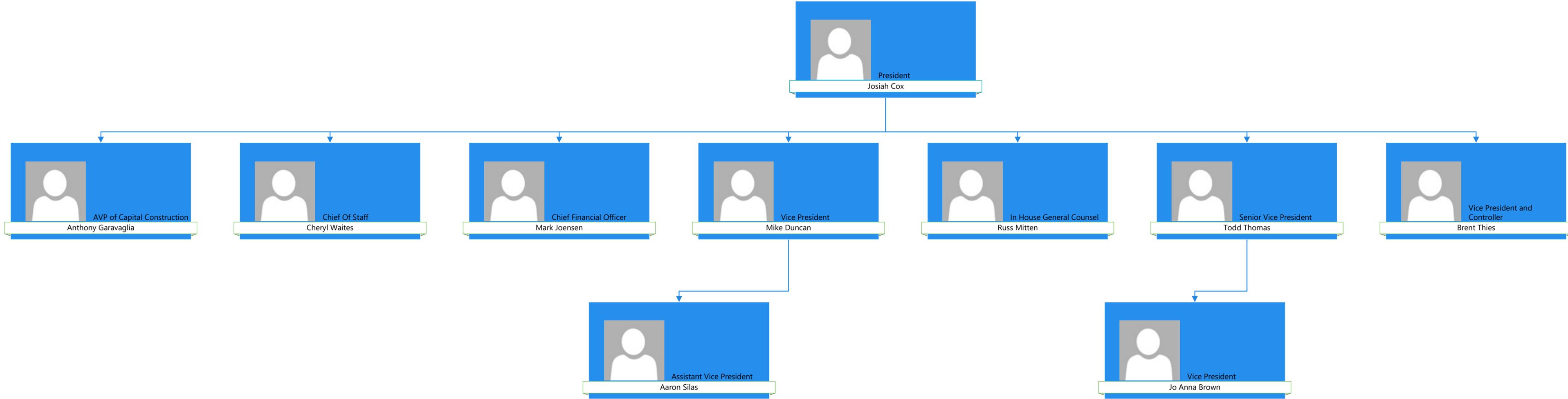


Melvin J. Malone

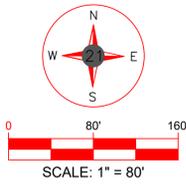
Attachments

cc: TPUC Docket Manager
Timothy Atwood, Central States Water Resources
Vance Broemel, Consumer Advocate Division

DR 1 – LIMESTONE ORG CHART

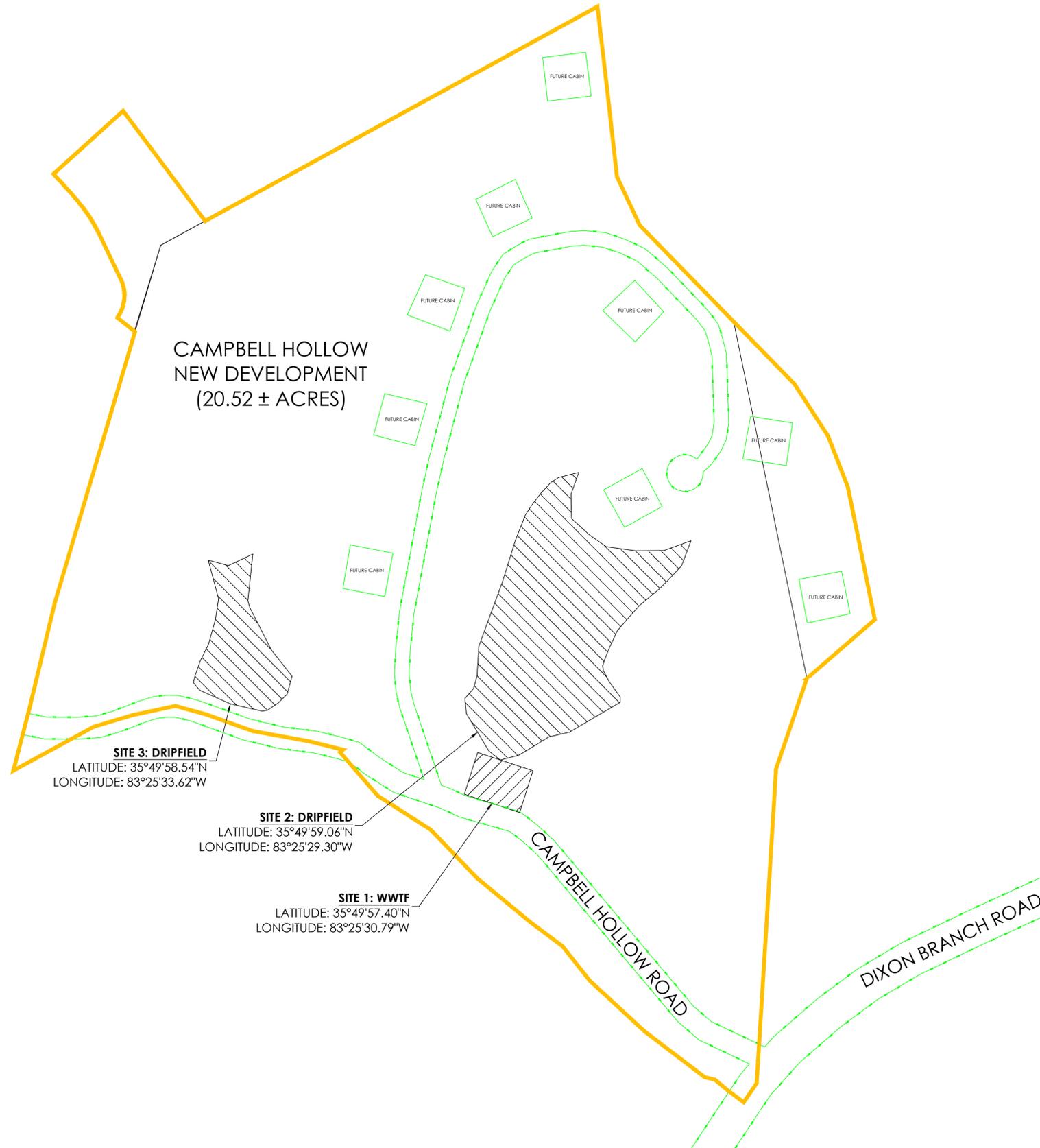


DR 2 – CAMPBELL HOLLOW MAP



PROPOSED SERVICE AREA MAP CAMPBELL HOLLOW (WASTEWATER) SEVIER COUNTY, TN

*ALL PLATS HAVE BEEN ACCOUNTED FOR



MAP LEGEND

BUILDING	
RIGHT OF WAY	
UTILITY SERVITUDE PER RECORD PLAT	
LOT LINE	
SUBDIVISION OUTLINE	
UTILITY AREA SERVICED	

MAP DISCLAIMER:

This document is a graphic representation of the approximate service area for a utility system. It is solely to provide a visual of the area of the system. This drawing does not constitute a property boundary survey and shall not be used to convey property.

Utility Note Disclaimer:

The service area shown hereon are depicted based on the service area map provided by the system manager and the Certificate of Convenience and Necessity (CCN). 21 Design Group, Inc performed no field verification of the layout and are unable to determine the exact location at this time. The location represents approximate location only and should not be construed as being 100% accurate. It is shown to provide general service area of the system to assist with ordering title work and preparation of scope for a License Land Surveyor. This sketch should not be used to interpret encroachments.

SITE 3: DRIPFIELD
LATITUDE: 35°49'58.54"N
LONGITUDE: 83°25'33.62"W

SITE 2: DRIPFIELD
LATITUDE: 35°49'59.06"N
LONGITUDE: 83°25'29.30"W

SITE 1: WWTF
LATITUDE: 35°49'57.40"N
LONGITUDE: 83°25'30.79"W

DATE:	10/29/2025
PROJECT NO:	0512-24
DRAWN BY:	A.M.D.
SCALE:	1"=80'
SHEET NAME:	SERVICE AREA MAP



1351 Jefferson, Suite 301
Washington, MD 63090
mail@21designgroup.net
P: 636-432-5029

DR 3 – CAMPBELL HOLLOW SITE PLANS

CAMPBELL HOLLOW

WASTEWATER TREATMENT SYSTEM DESIGN

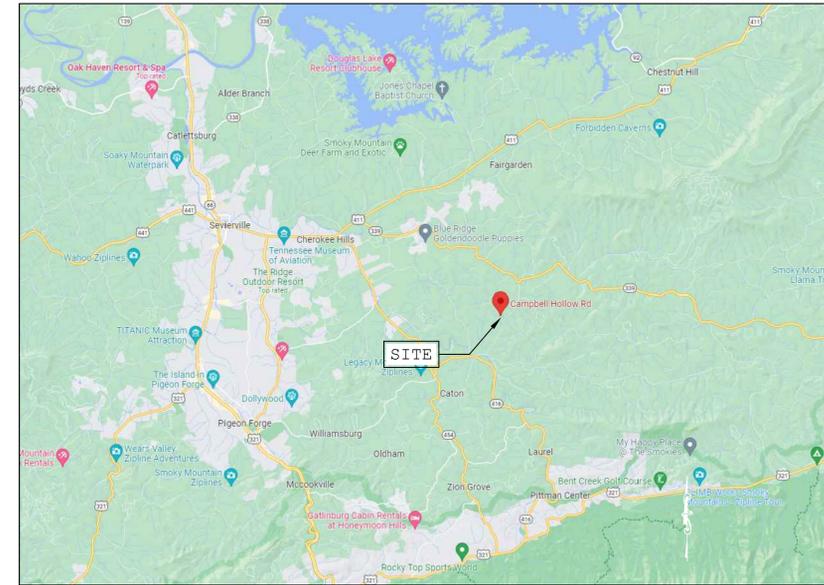
FOR WADE HOWELL

PROJECT LOCATION

CAMPBELL HOLLOW ROAD, SEVIERVERVILLE, TN



PARCEL MAP
NOT TO SCALE



VICINITY MAP
NOT TO SCALE

OWNER/ CONTACT

WADE HOWELL

HB South, 100 Matthews Blvd,
Destin, Fl. 32541

ENGINEER

CODY MCELROY PE

DSH & Associates,
10519 Lexington Dr,
Knoxville, TN 37932

276-393-4421
cmcelroy@dshassociates.com



INDEX OF DRAWINGS

Sheet List Table	
Sheet Number	Sheet Title
CV	COVER SHEET
1.0	EXISTING CONDITIONS
1.1	SOIL SCIENTIST MAP
1.2	SITE PLAN
2.0	WASTEWATER TREATMENT PLANT SCHEMATIC LAYOUT
2.1	AX100 POD DIMS
2.2	AX100 BERM DETAILS
2.3	AX100 AIR INLET DETAILS
2.4	FILTER, UV, FLOW METER LAYOUT
2.5	RECIRCULATION TANK DETAILS
2.6	STORAGE TANK DETAILS
3.0	DRIP FIELD LAYOUT
3.1	DRIP FIELD DETAILS
4.0	PROCESS FLOW DIAGRAM
5.0	ELECTRICAL LAYOUT
6.0	WASTEWATER COLLECTION SYSTEM
6.1	COLLECTION SYSTEM DETAILS
6.2	STEP TANK DETAILS

SHEET SET GROUP:
WWTP

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES,
10519 LEXINGTON
DR, KNOXVILLE,
TN 37932

CLIENT
WADE HOWELL

**HB SOUTH, 100
MATTHEWS BLVD,
DESTIN, FL.
32541**

PROJECT
**CAMPBELL
HOLLOW**

**Campbell Hollow
Road,
Sevierville, TN**

DATE CREATED
7/2/24

DATE PRINTED
7/2/24

DATE REVISION
11-07-23

SCALE

DESIGNED BY
CM

DRAWN BY
CD

CHECKED BY
CM

PROJECT NUMBER
212

SHEET TITLE
COVER SHEET

SHEET NUM.	REV.
CV	0

SHEET SET GROUP: WWTP

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES,
10519 LEXINGTON
DR, KNOXVILLE,
TN 37932

CLIENT
WADE HOWELL

HB SOUTH, 100
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32541

PROJECT
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Campbell Hollow
Road,
Sevierville, TN

DATE CREATED
11/7/23

DATE PRINTED
7/2/24

DATE REVISION
11-07-23

SCALE
1" = 100'

DESIGNED BY
CM

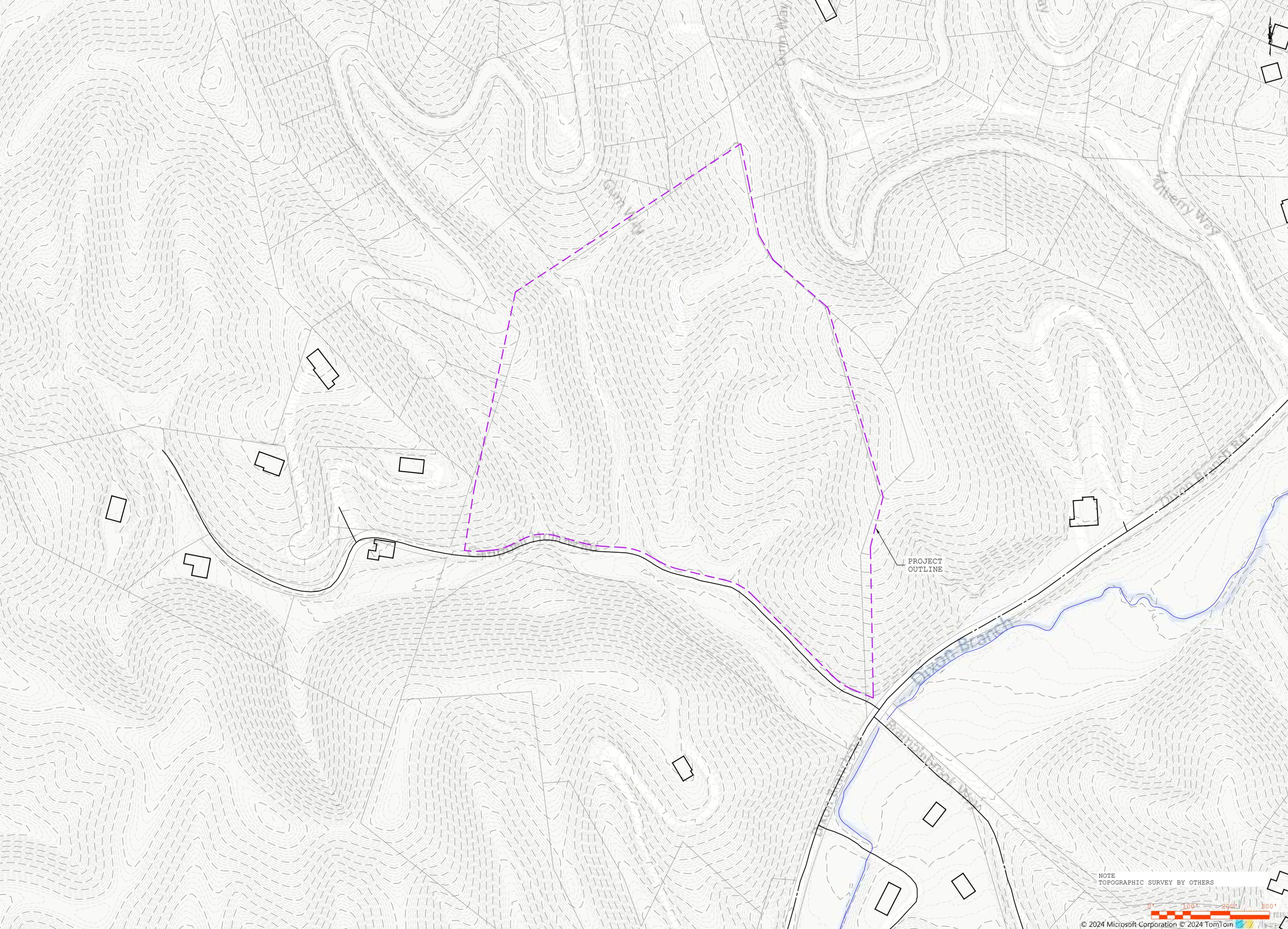
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PROJECT NUMBER
212

SHEET TITLE
EXISTING
CONDITIONS

SHEET NUM. REV.
1.0 0



NOTE
TOPOGRAPHIC SURVEY BY OTHERS





SHEET SET GROUP: **WWTP**

ENGINEER
CODY MCELROY PE

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10519 LEXINGTON
DR, KNOXVILLE,
TN 37932

CLIENT
WADE HOWELL

**HB SOUTH, 100
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CM

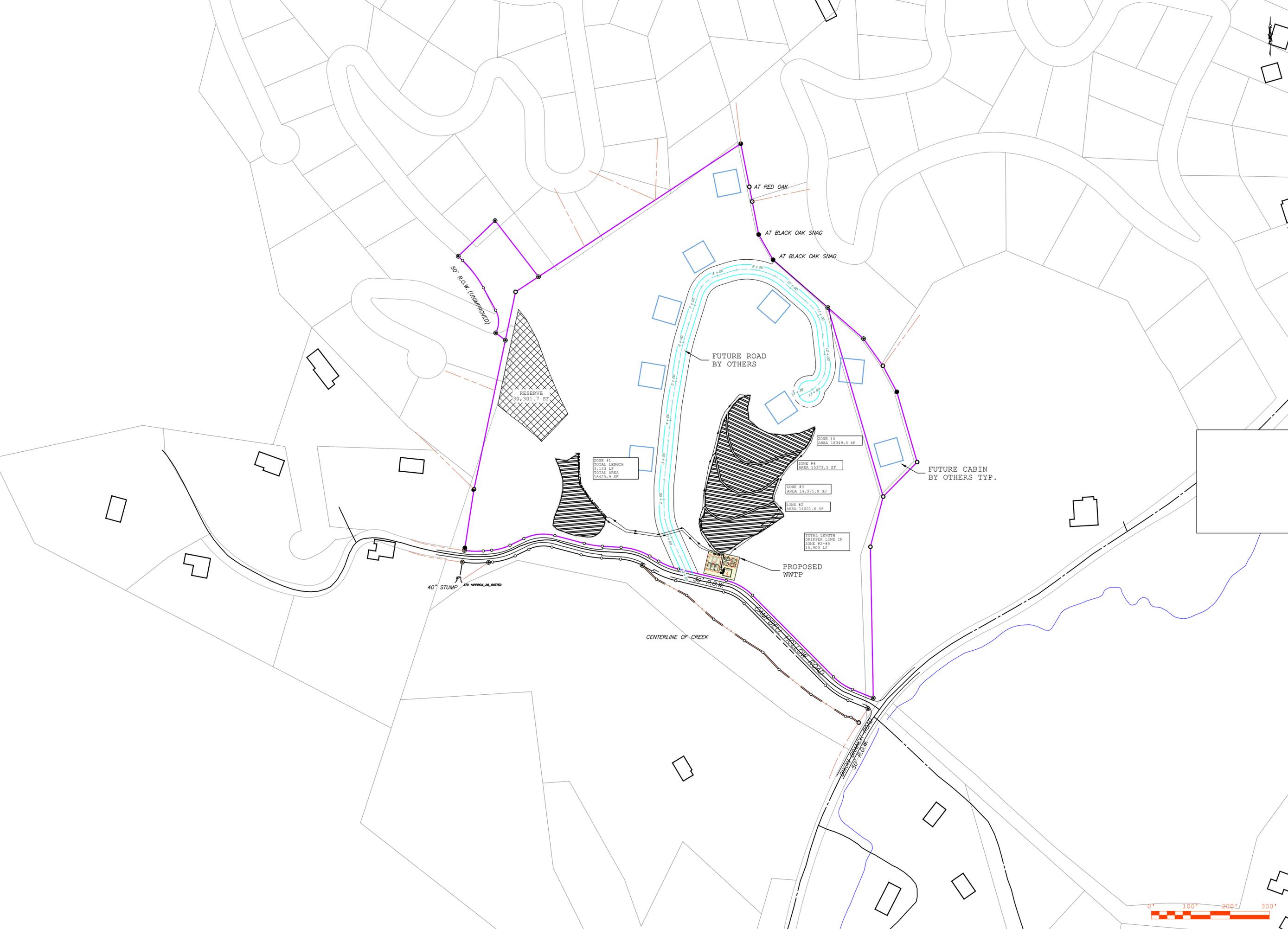
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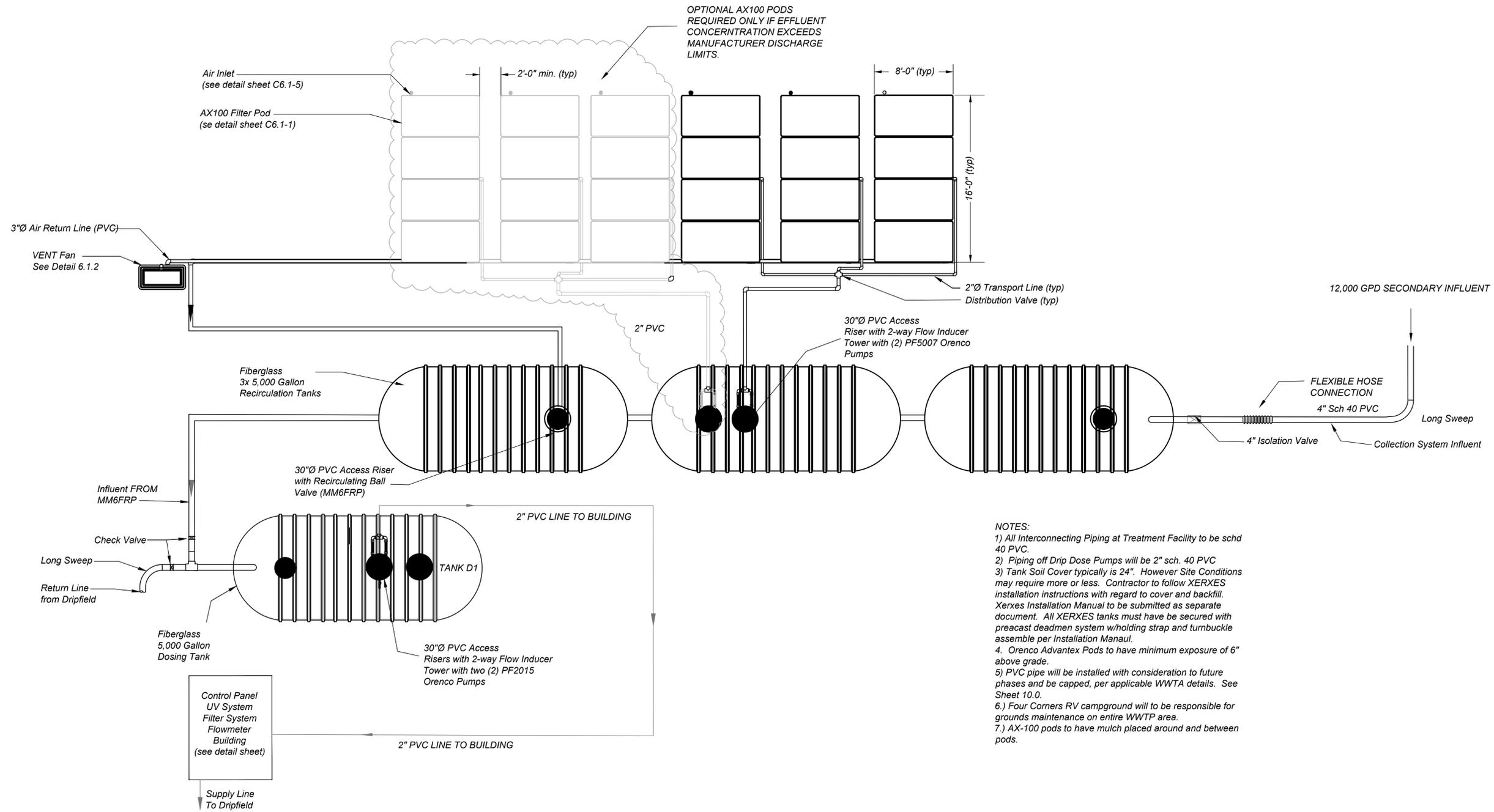
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CM

PROJECT NUMBER
212

SHEET TITLE
SITE PLAN

SHEET NUM. **1.2** REV. **0**





- NOTES:
- 1) All Interconnecting Piping at Treatment Facility to be schd 40 PVC.
 - 2) Piping off Drip Dose Pumps will be 2" sch. 40 PVC
 - 3) Tank Soil Cover typically is 24". However Site Conditions may require more or less. Contractor to follow XERXES installation instructions with regard to cover and backfill. Xerxes Installation Manual to be submitted as separate document. All XERXES tanks must have be secured with precast deadmen system w/holding strap and turnbuckle assemble per Installation Manaul.
 4. Orenco Advantex Pods to have minimum exposure of 6" above grade.
 - 5) PVC pipe will be installed with consideration to future phases and be capped, per applicable WWA details. See Sheet 10.0.
 - 6.) Four Corners RV campground will be responsible for grounds maintenance on entire WWTP area.
 - 7.) AX-100 pods to have mulch placed around and between pods.



SHEET SET GROUP: WWTP

ENGINEER
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10519 LEXINGTON
DR, KNOXVILLE,
TN 37932

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HB SOUTH, 100
MATTHEWS BLVD,
DESTIN, FL.
32541

PROJECT
CAMPBELL
HOLLOW

Campbell Hollow
Road,
Sevierville, TN

DATE CREATED
11/7/23

DATE PRINTED
7/2/24

DATE REVISION
11-07-23

SCALE
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DESIGNED BY
CM

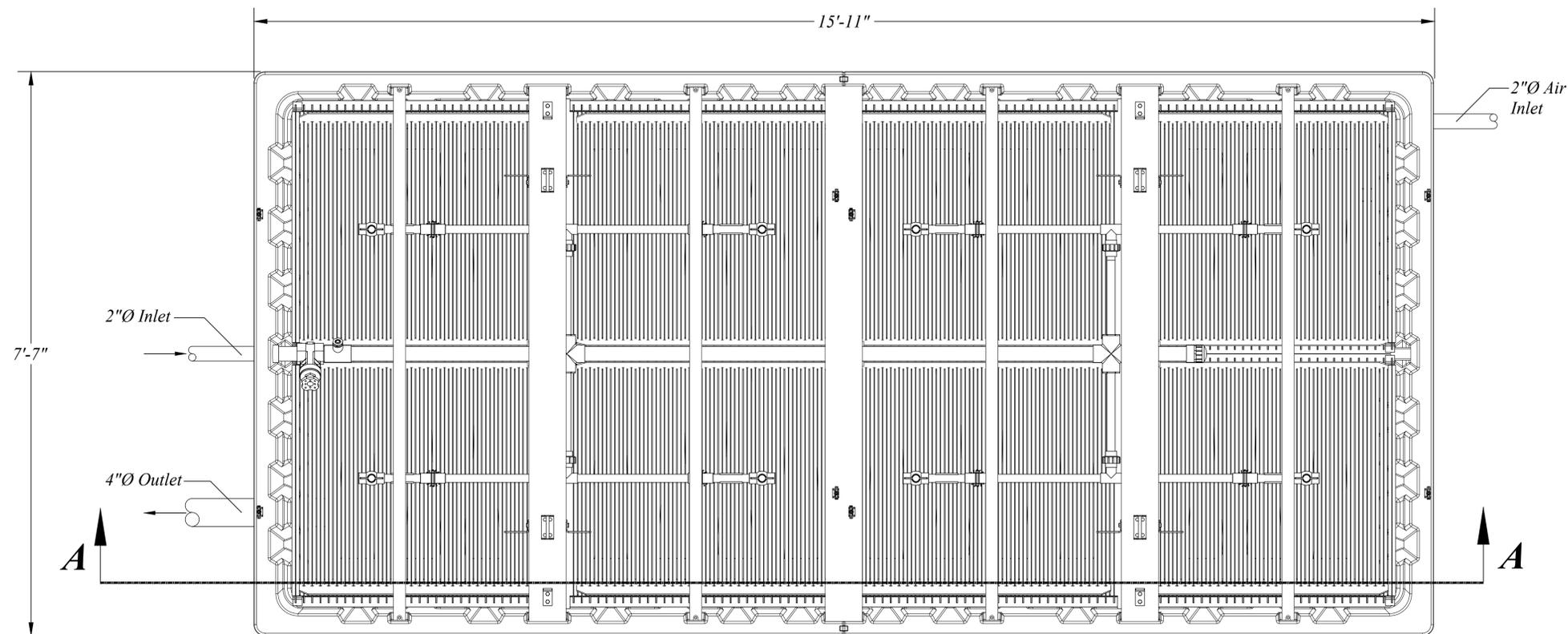
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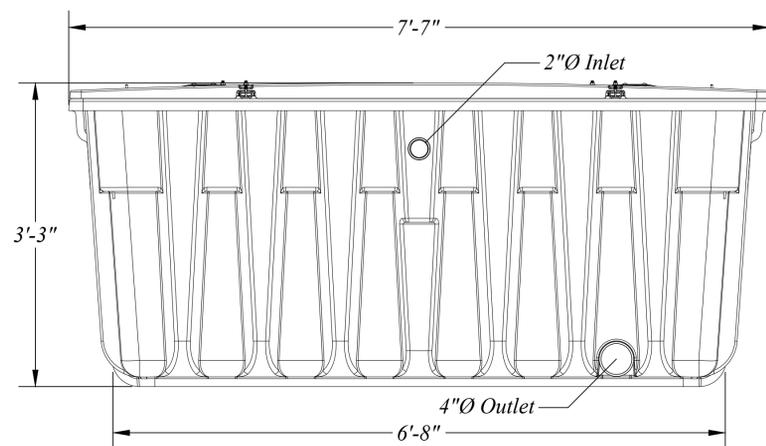
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212

SHEET TITLE
WASTE WATER
TREATMENT PLANT
LAYOUT

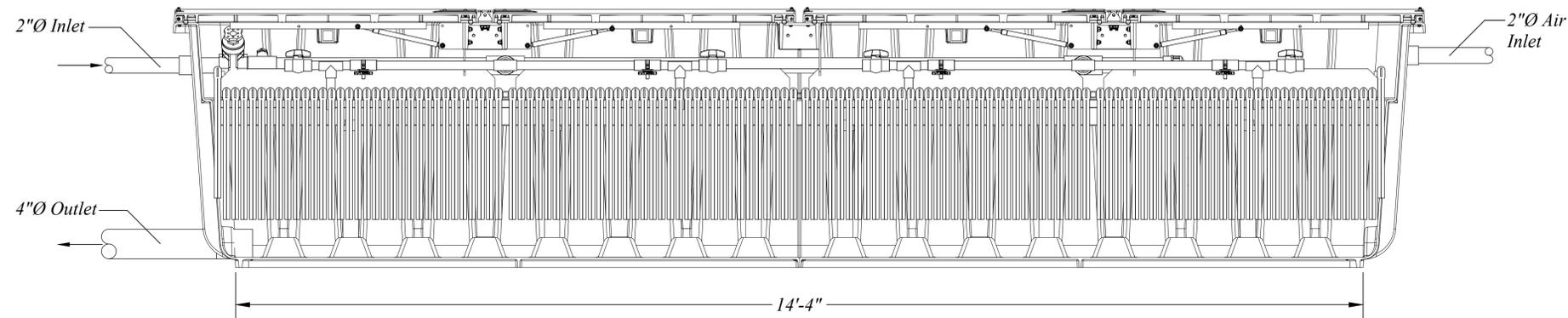
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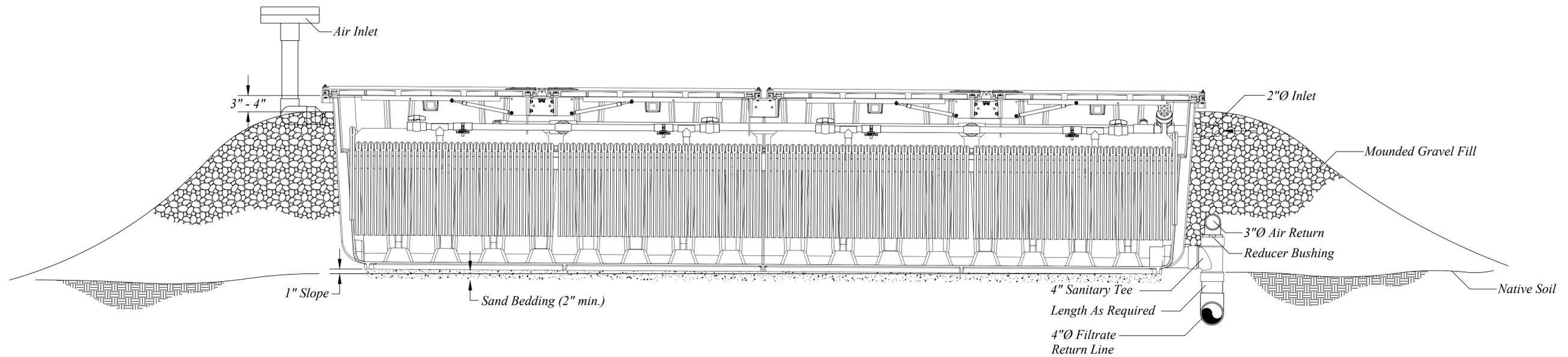
AX100 Plan View
Scale: 1" = 2'-0"



AX100 End View
Scale: 1" = 2'-0"



Section A-A
Scale: 1" = 2'-0"



**Bermed Pod Detail
(Manifold Air Inlet Option)**
Scale: 1" = 2'-0"



© Orenco Systems, Inc.
Portions or all of this Proposed System Configuration Drawing, as appropriate, may be reproduced and integrated into the site-specific layout and configuration of a system by its designer.

Disclaimer: This Proposed System Configuration Drawing is provided solely as a design aid and illustrates one possible configuration of a system that would comply with Orenco's design criteria for the requirements and/or specifications that have been communicated to Orenco (based on third-party standards testing protocols and performance reports, as applicable). Design decisions, including the actual layout and configuration of the system and its viability for the project, are at the sole discretion of the systems's designer.

**AdvanTex® AX100 Treatment
System Berming Detail**

AX100 Berm Detail

Drawn By: **BAS**

Reviewed By: **JL**

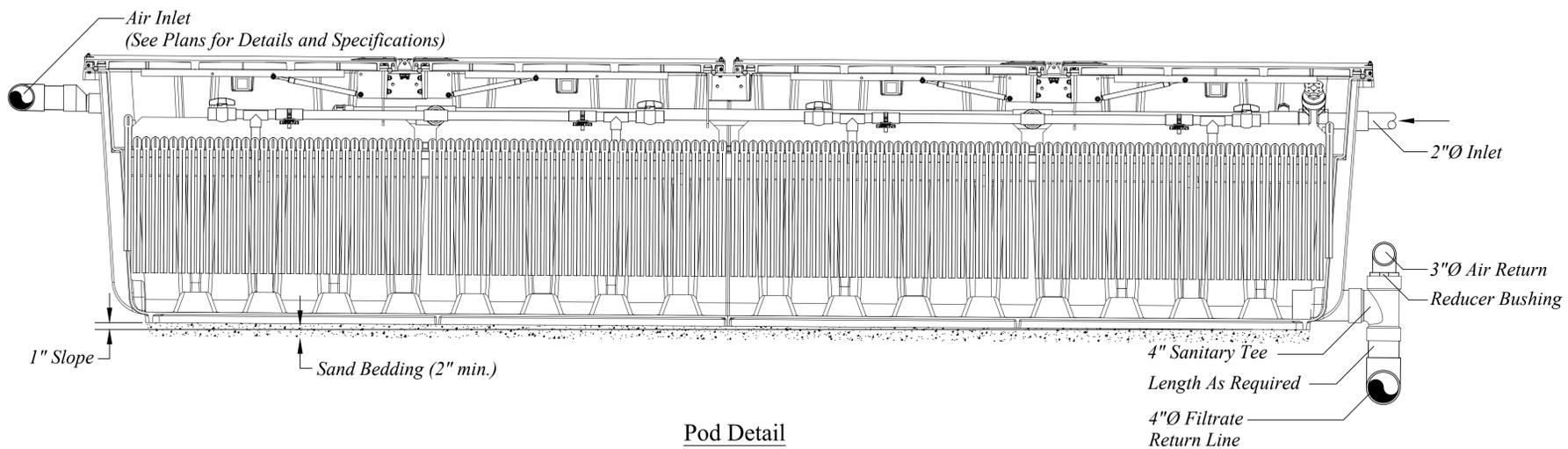
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Scale: **AS SHOWN**

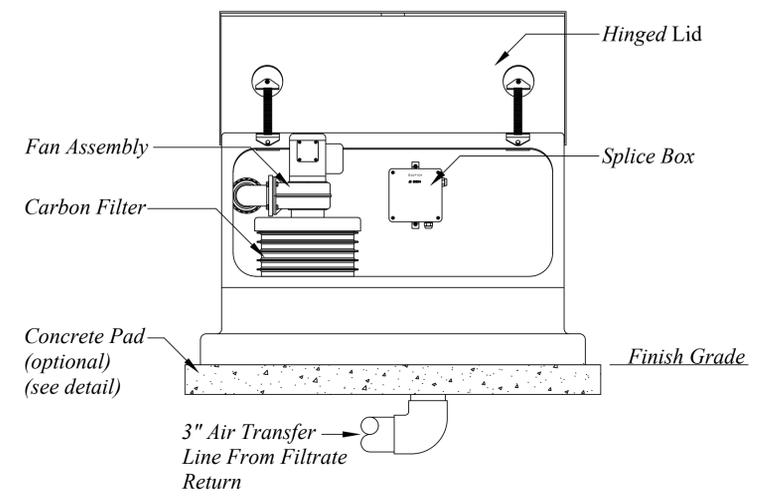
Sheet: **1 OF 1**

Rev: **5.0** Date: **4/25/2022**

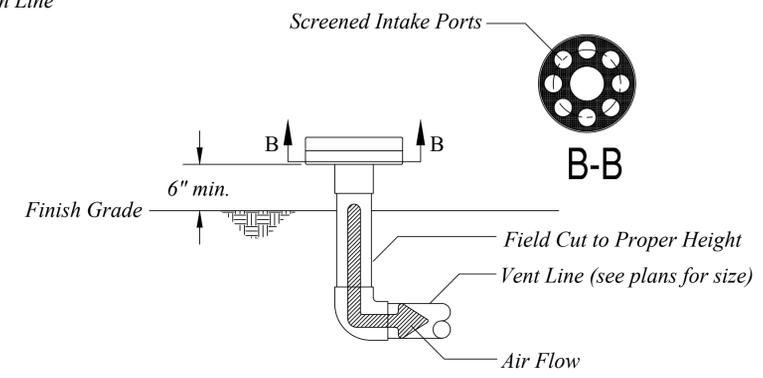
AdvanTex® AX100 System Ventilation Details



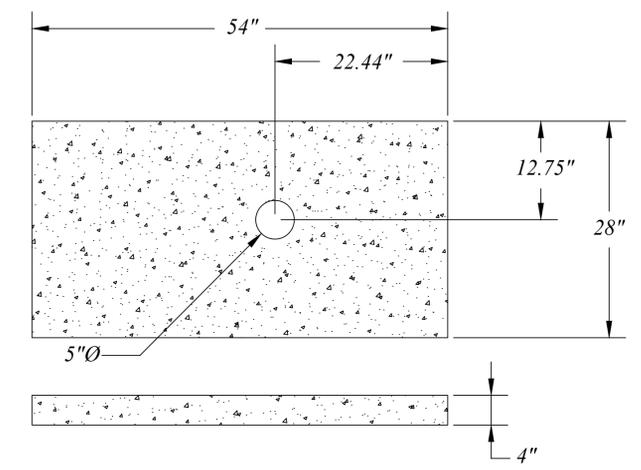
Pod Detail
Scale: 1" = 2'-0"



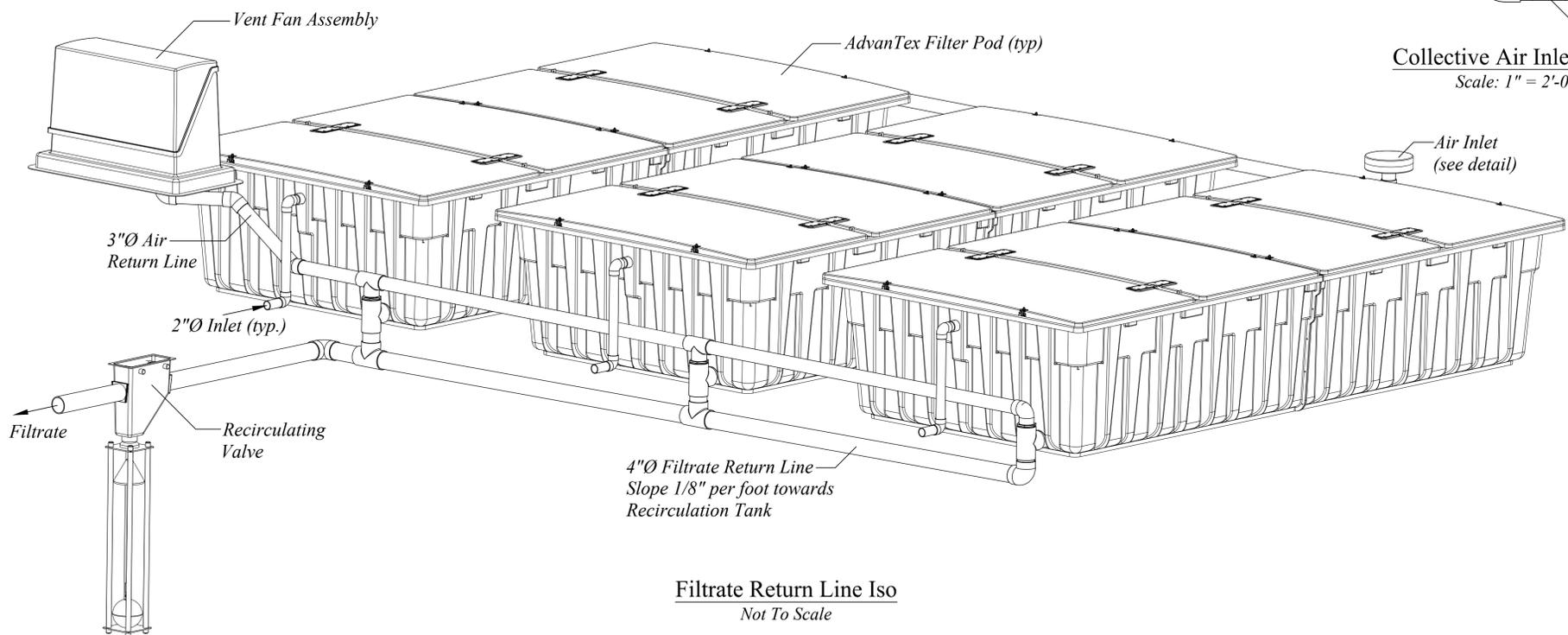
Above Ground Fan Assembly
Scale: 1" = 2'-0"



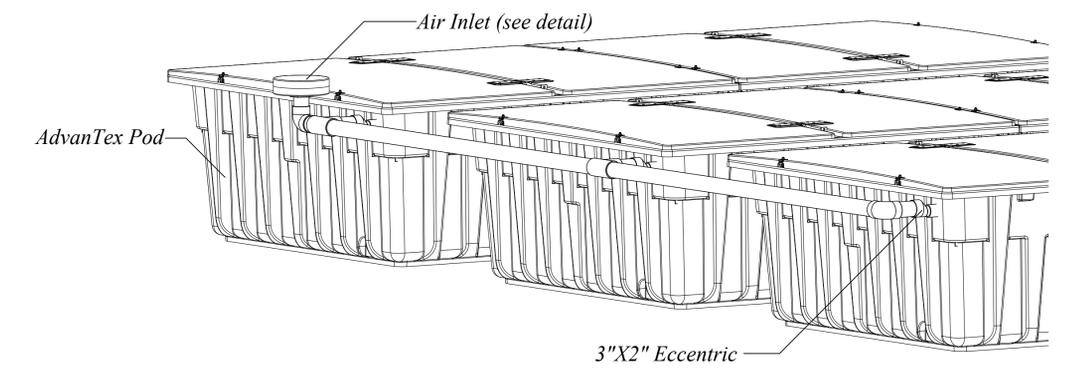
Collective Air Inlet Detail
Scale: 1" = 2'-0"



Optional Fan Assy Pad Detail
Scale: 1" = 2'-0"



Filtrate Return Line Iso
Not To Scale



Collective Air Inlet Option
Not To Scale

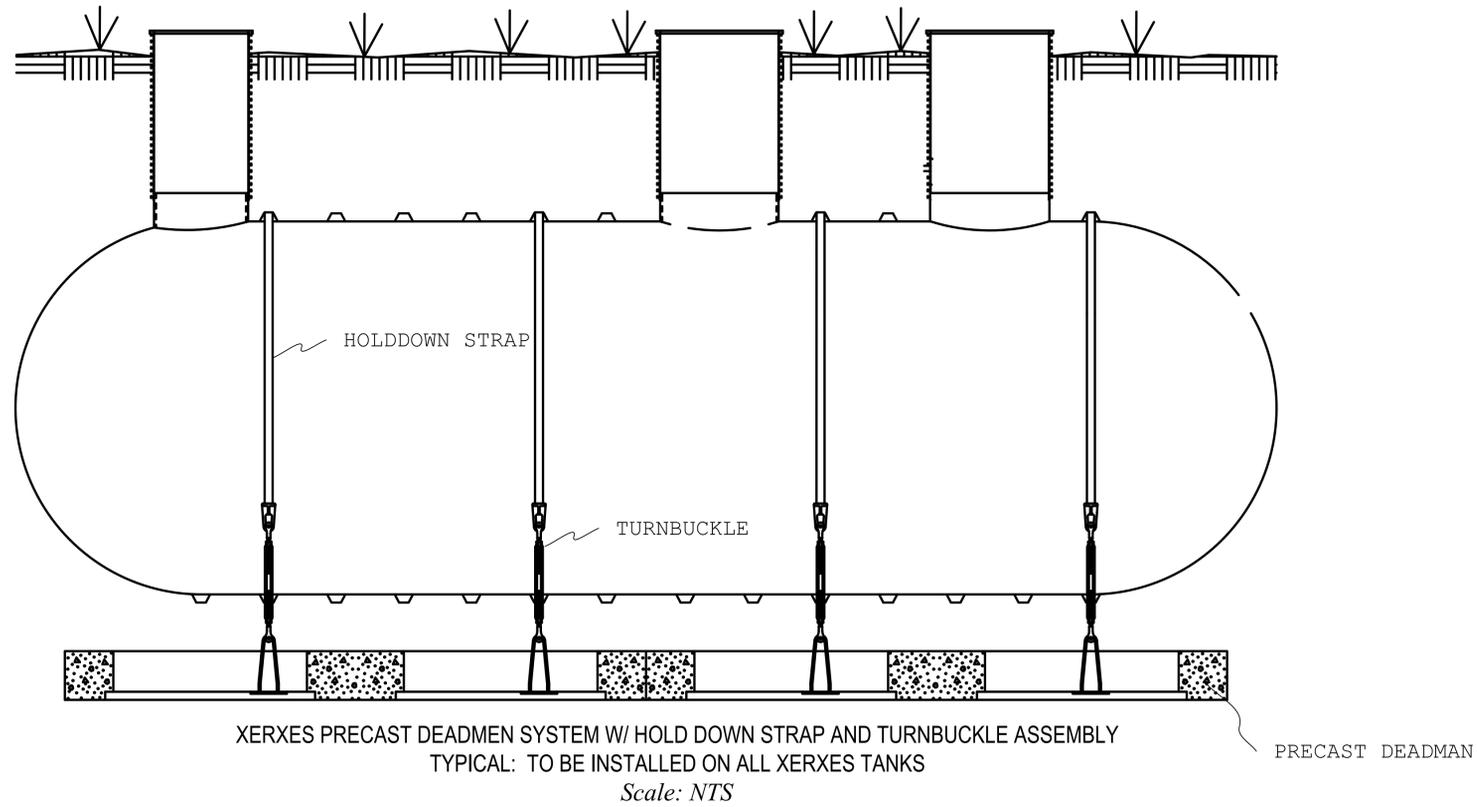


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Portions or all of this Proposed System Configuration Drawing, as appropriate, may be reproduced and integrated into the site-specific layout and configuration of a system by its designer.

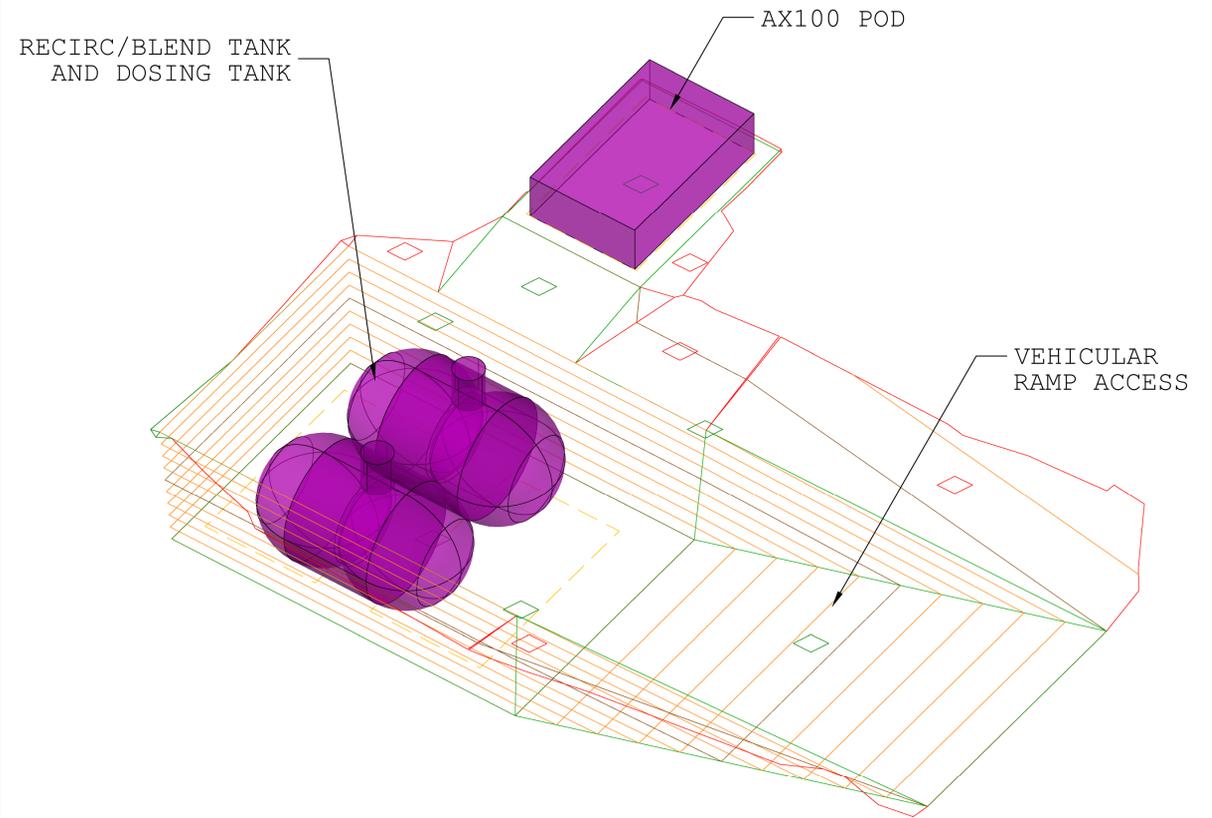
Disclaimer: This Proposed System Configuration Drawing is provided solely as a design aid and illustrates one possible configuration of a system that would comply with Orenco's design criteria for the requirements and/or specifications that have been communicated to Orenco (based on third-party standards testing protocols and performance reports, as applicable). Design decisions, including the actual layout and configuration of the system and its viability for the project, are at the sole discretion of the systems's designer.

AdvanTex® AX100 Treatment System Ventilation
Collective air inlet details

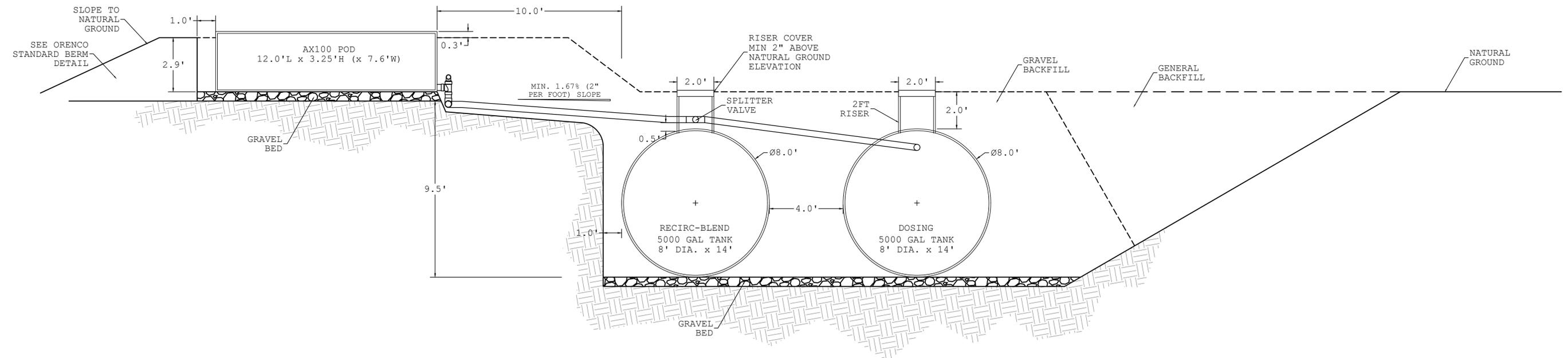
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Reviewed By:	JL	Sheet:	1 OF 1
File:	COLLECTIVE AIR INLET DETAILS.DWG	Rev:	5.0
		Date:	4/25/2022



TANK DEADMAN DETAILS
NTS



TANK EXCAVATION DETAIL
NTS



TANK PLACEMENT DETAILS
NTS



SHEET SET GROUP:
WWTP

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES,
10519 LEXINGTON DR, KNOXVILLE, TN 37932

CLIENT
WADE HOWELL

HB SOUTH, 100 MATTHEWS BLVD, DESTIN, FL. 32541

PROJECT
CAMPBELL HOLLOW

Campbell Hollow Road, Sevierville, TN

DATE CREATED 7/2/24

DATE PRINTED 7/2/24

DATE REVISION 11-07-23

SCALE

DESIGNED BY CM

DRAWN BY CD

CHECKED BY CM

PROJECT NUMBER 212

SHEET TITLE
TANK ELEVATIONS

SHEET NUM.	REV.
2.5	0



SHEET SET GROUP: **WWTP**

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES,
10519 LEXINGTON
DR, KNOXVILLE,
TN 37932

CLIENT
WADE HOWELL

**HB SOUTH, 100
MATTHEWS BLVD,
DESTIN, FL.
32541**

PROJECT
**CAMPBELL
HOLLOW**

**Campbell Hollow
Road,
Sevierville, TN**

DATE CREATED
11/7/23

DATE PRINTED
7/2/24

DATE REVISION
11-07-23

SCALE

DESIGNED BY
CM

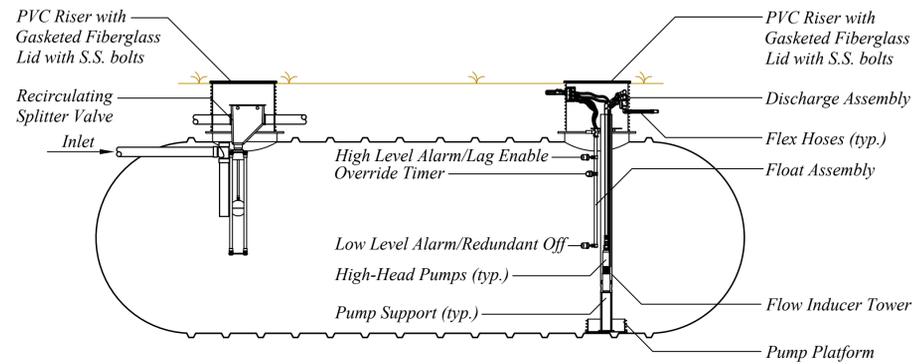
DRAWN BY
CD

CHECKED BY
CM

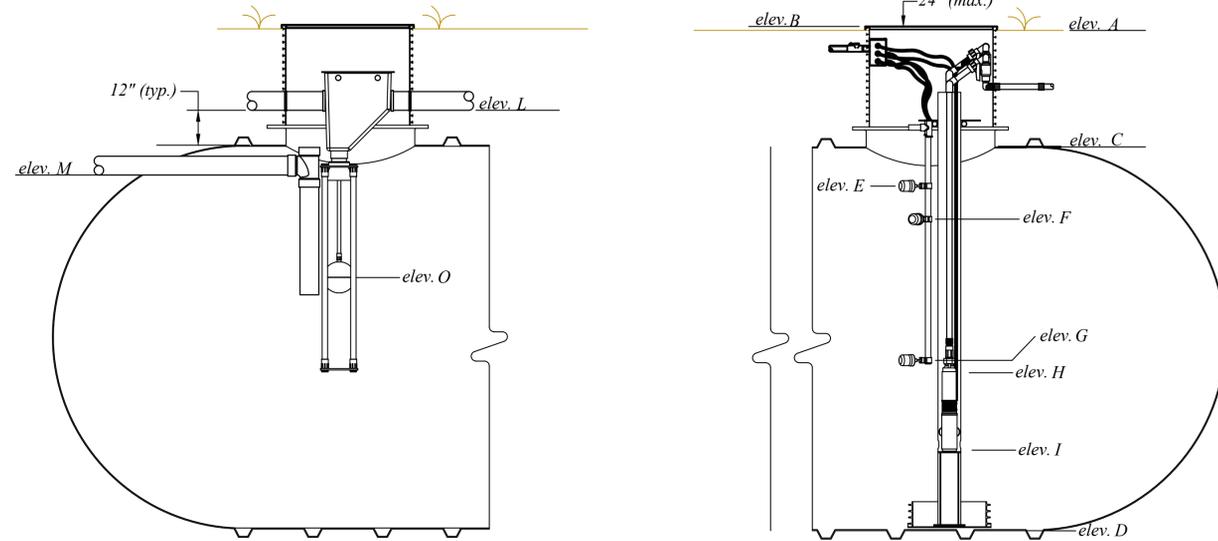
PROJECT NUMBER
212

SHEET TITLE
**TANK AND BASIN
DETAILS**

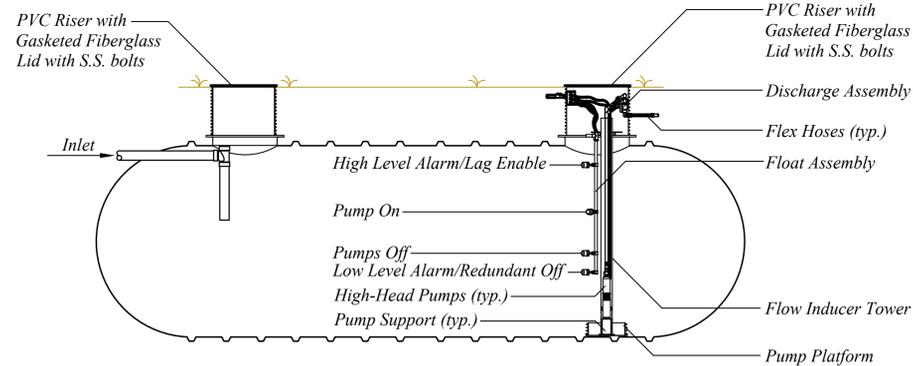
SHEET NUM. **2.6** REV. **0**



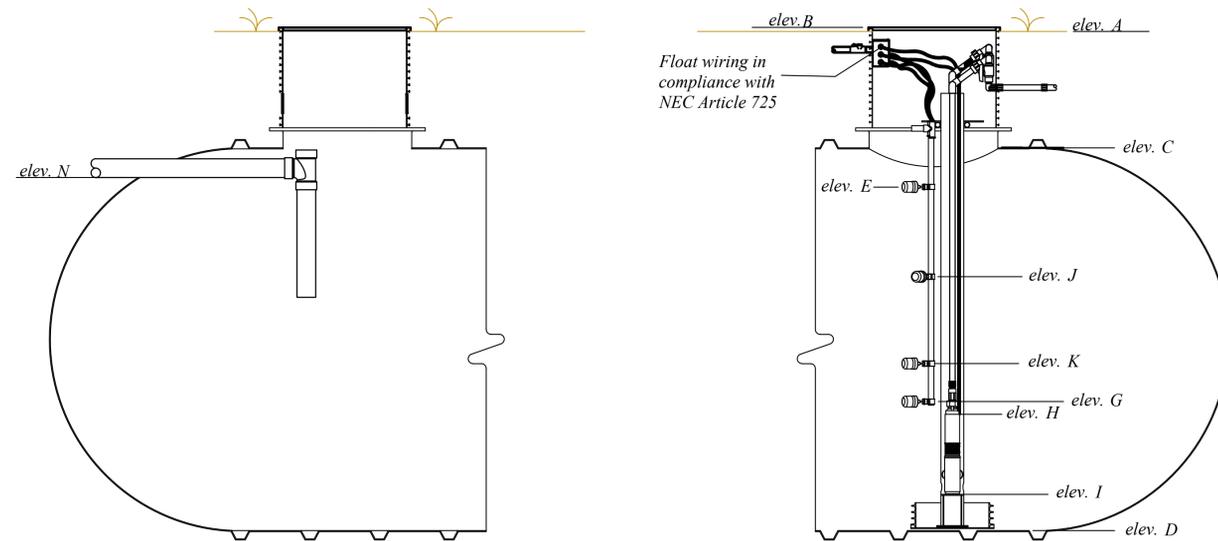
Recirculation Tank
Scale: NTS



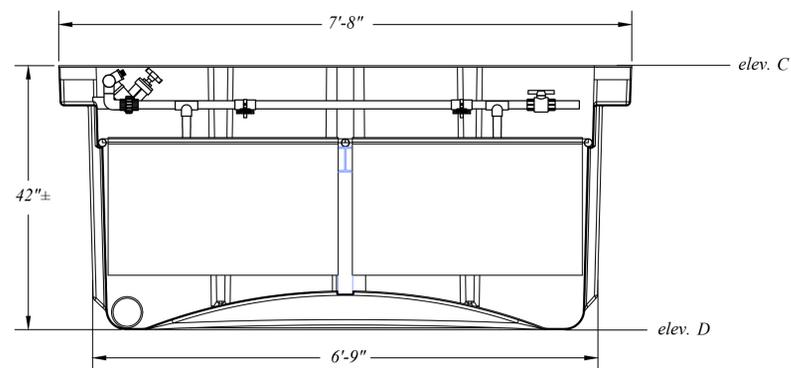
Recirculation Tank Float and RSV Settings
Scale: NTS



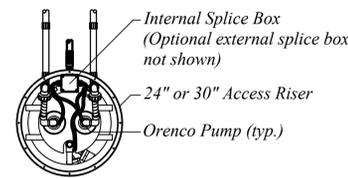
Dose Tank
Scale: NTS



Dose Tank Float Settings
Scale: NTS



AX100 Settings
Scale: NTS



Duplex Flow Inducer
Typical Plumbing Example
Scale: 1" = 3'-0"



SHEET SET GROUP: **WWTP**

ENGINEER: **CODY MCELROY PE**

DSH & ASSOCIATES,
10519 LEXINGTON DR, KNOXVILLE, TN 37932

CLIENT: **WADE HOWELL**

HB SOUTH, 100 MATTHEWS BLVD, DESTIN, FL. 32541

PROJECT: **CAMPBELL HOLLOW**

Campbell Hollow Road, Sevierville, TN

DATE CREATED: **11/17/23**

DATE PRINTED: **7/2/24**

DATE REVISION: **11-07-23**

SCALE: **1" = 50'**

DESIGNED BY: **CM**

DRAWN BY: **CD**

CHECKED BY: **CM**

PROJECT NUMBER: **212**

SHEET TITLE: **DRIP FIELD LAYOUT**

SHEET NUM.: **3.0**

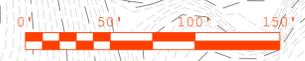
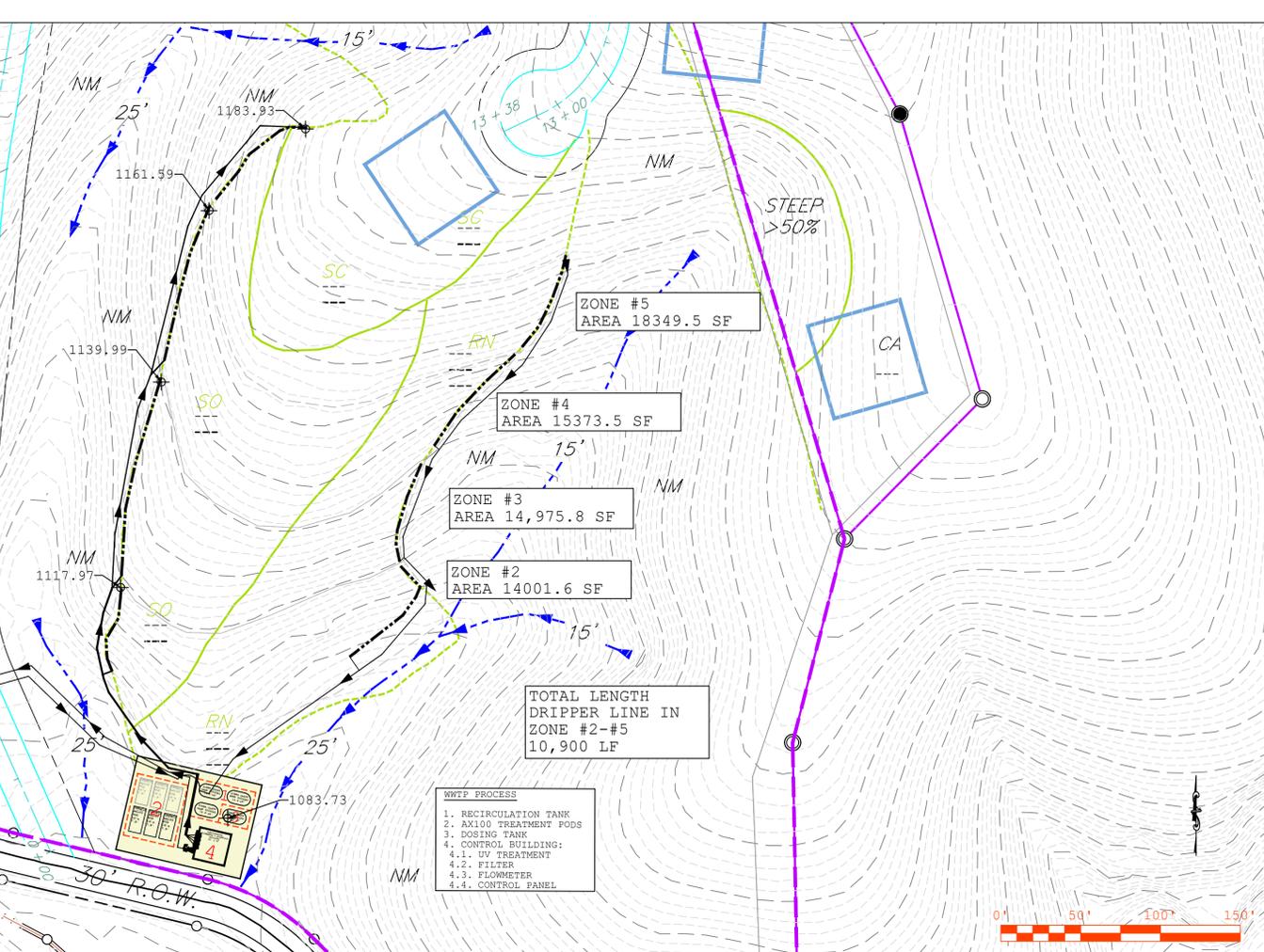
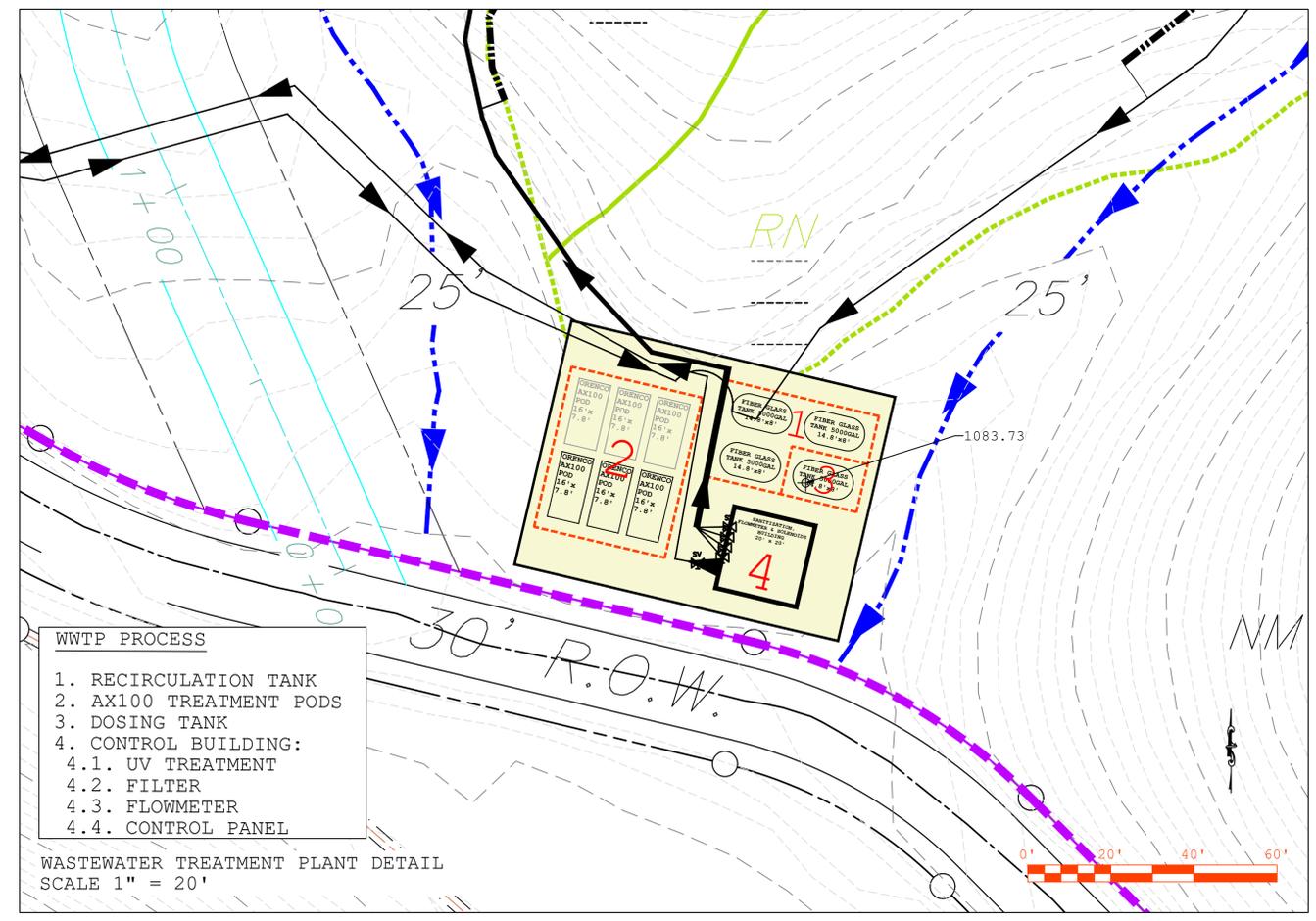
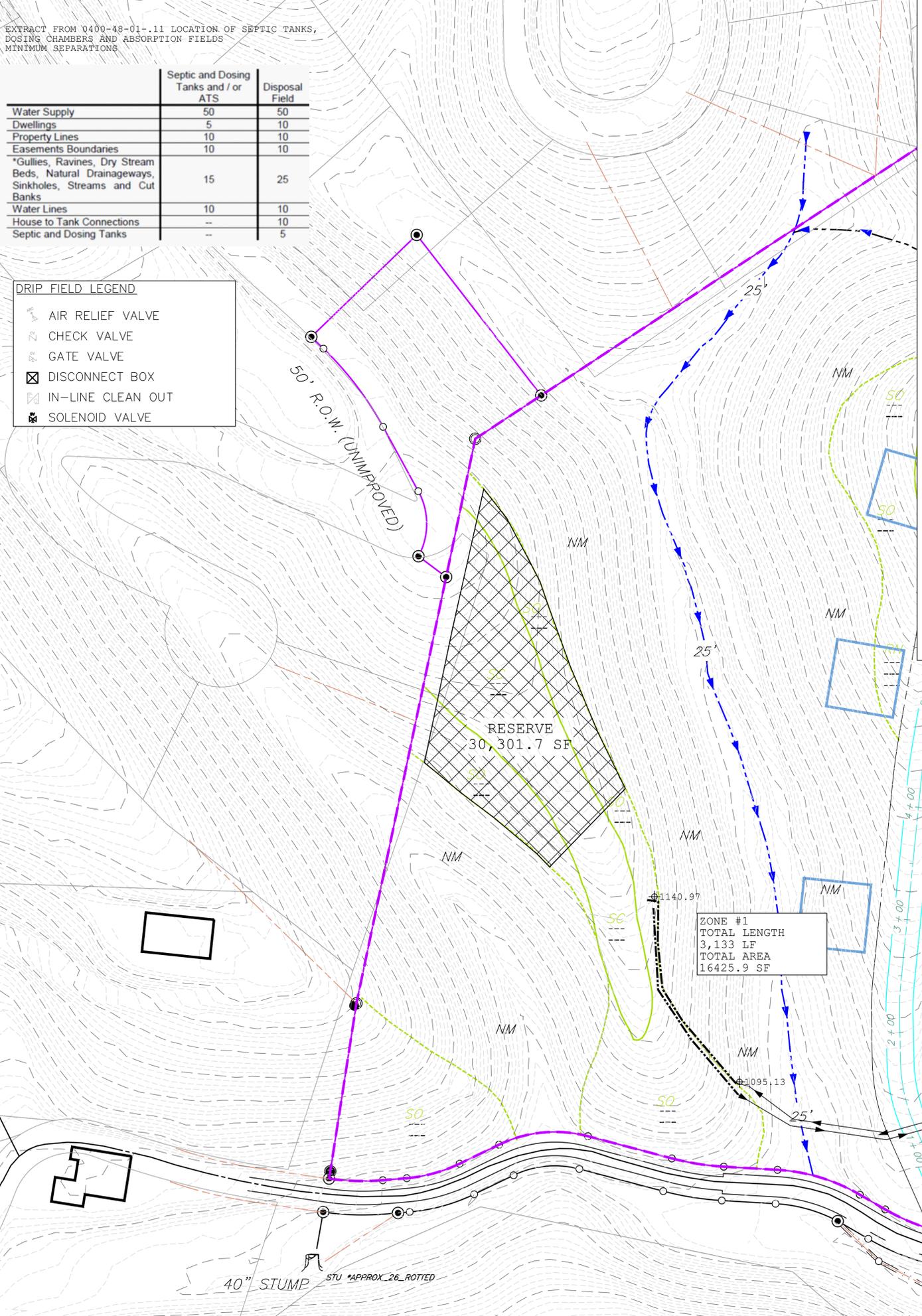
REV.: **0**

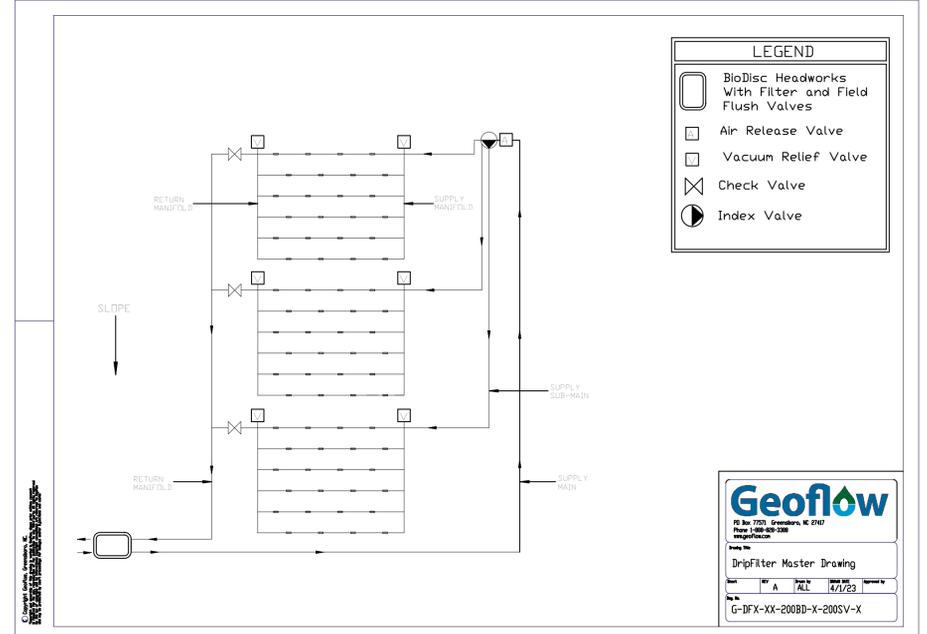
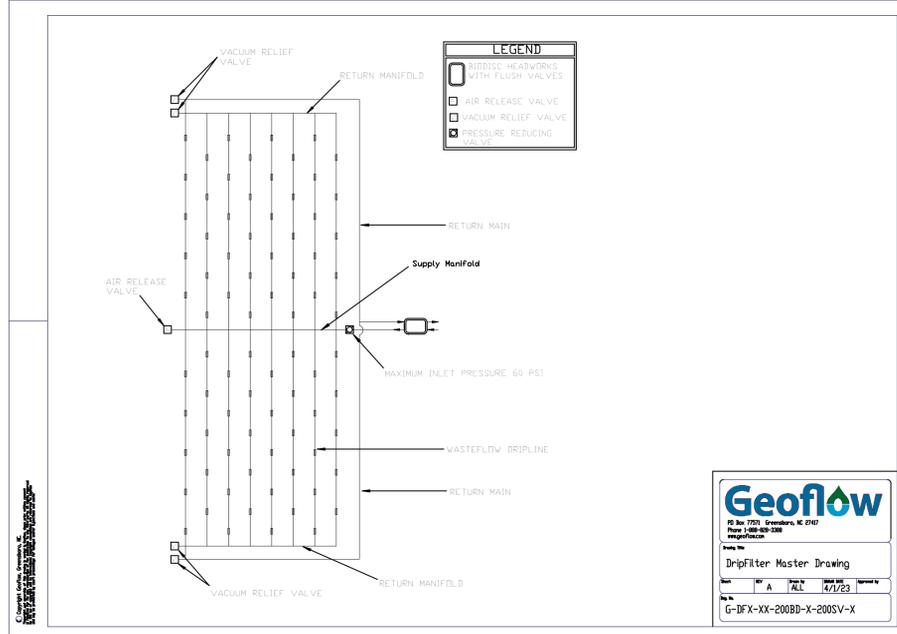
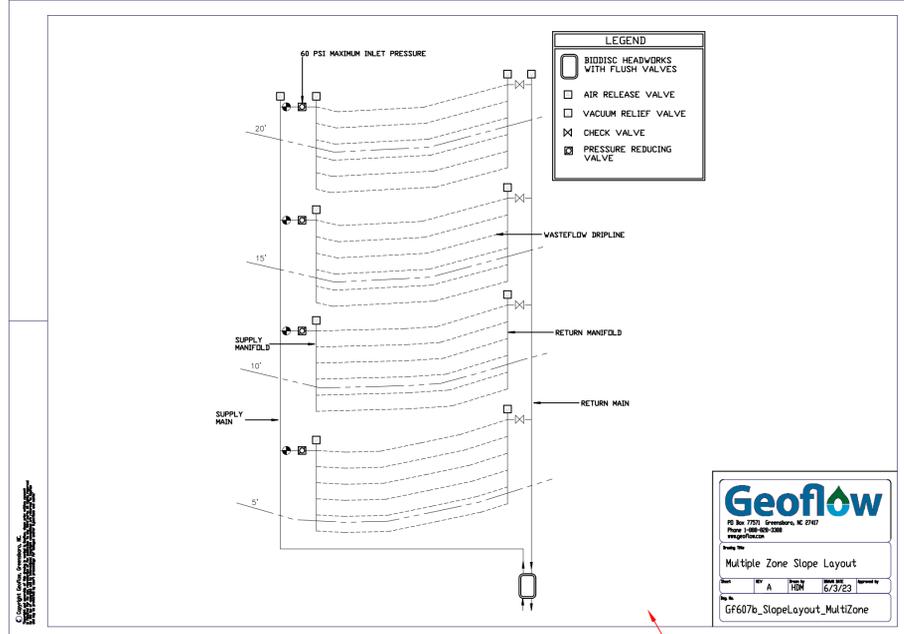
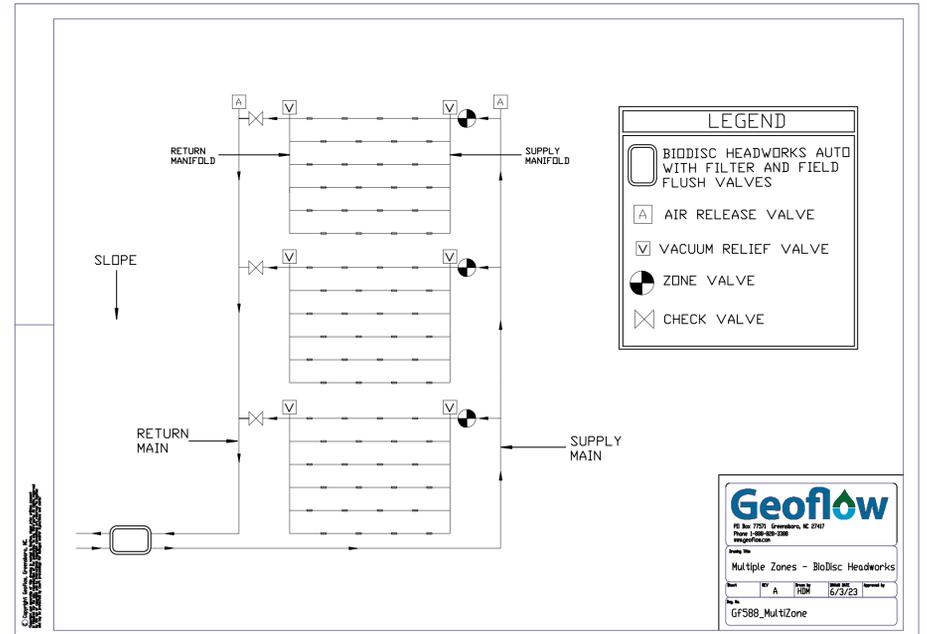
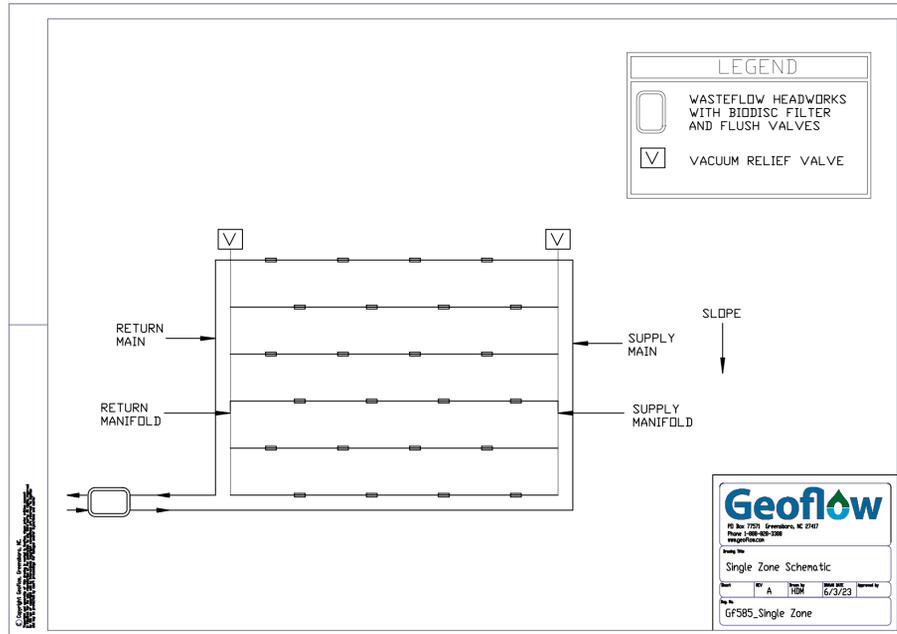
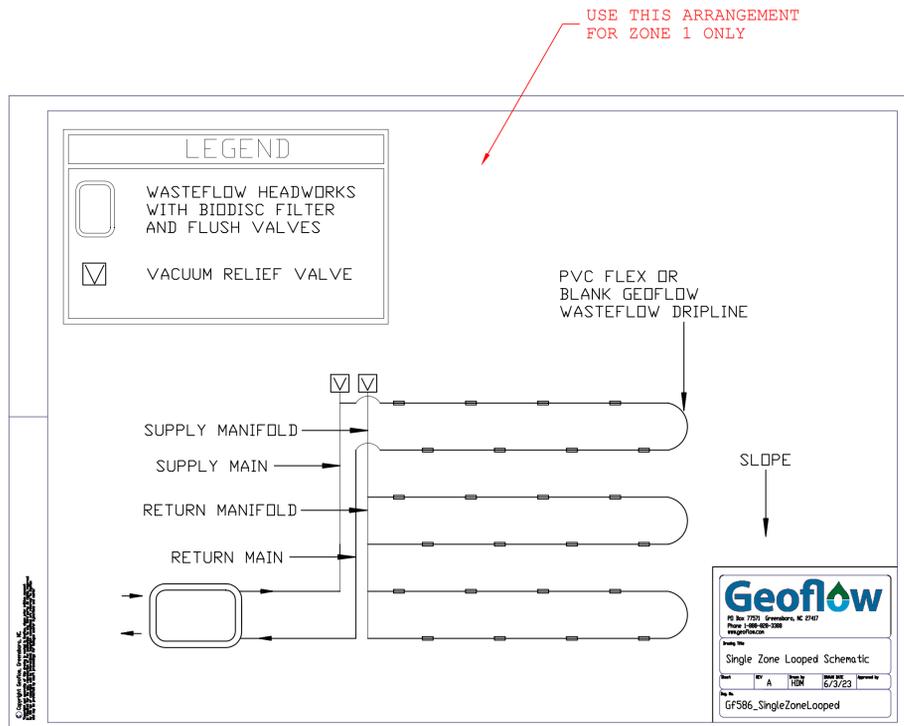
EXTRACT FROM 0400-48-01-11 LOCATION OF SEPTIC TANKS, DOSING CHAMBERS AND ABSORPTION FIELDS MINIMUM SEPARATIONS

	Septic and Dosing Tanks and / or ATS	Disposal Field
Water Supply	50	50
Dwellings	5	10
Property Lines	10	10
Easements Boundaries	10	10
*Gullies, Ravines, Dry Stream Beds, Natural Drainageways, Sinkholes, Streams and Cut Banks	15	25
Water Lines	10	10
House to Tank Connections	--	10
Septic and Dosing Tanks	--	5

DRIP FIELD LEGEND

- AIR RELIEF VALVE
- CHECK VALVE
- GATE VALVE
- DISCONNECT BOX
- IN-LINE CLEAN OUT
- SOLENOID VALVE





SHEET SET GROUP:

WWTP

ENGINEER

CODY MCELROY PE

DSH & ASSOCIATES
10519 LEXINGTON DR,
KNOXVILLE, TN 37932

CLIENT

WADE HOWELL

HB SOUTH, 100
MATTHEWS BLVD,
DESTIN, FL. 32541

PROJECT

CAMPBELL
HOLLOW

CAMPBELL HOLLOW
ROAD, SEVIERVILLE,
TN

DATE CREATED

2024-01-17

DATE PRINTED

2024-07-02

DATE REVISION

SCALE

NTS

DESIGNED BY

CM

DRAWN BY

CD

CHECKED BY

CM

PROJECT NUMBER

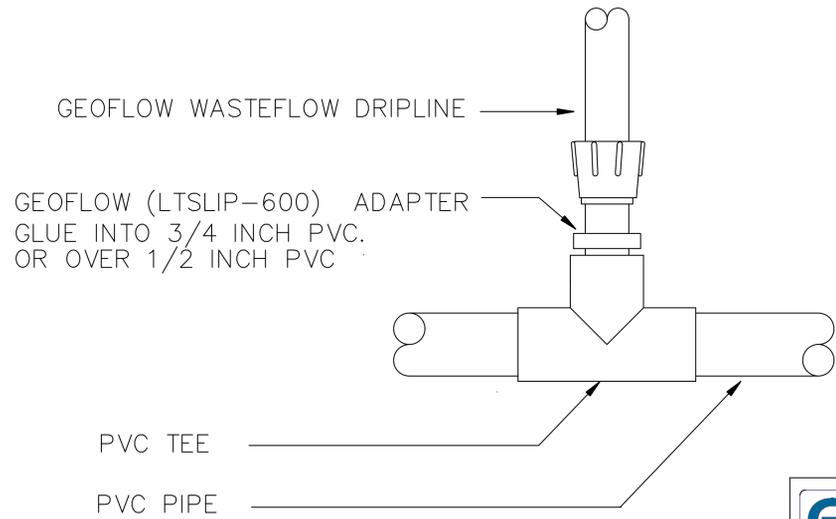
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SHEET TITLE
DRIP FIELD
SCHEMATIC
LAYOUT

SHEET NUM.

REV.

3.1

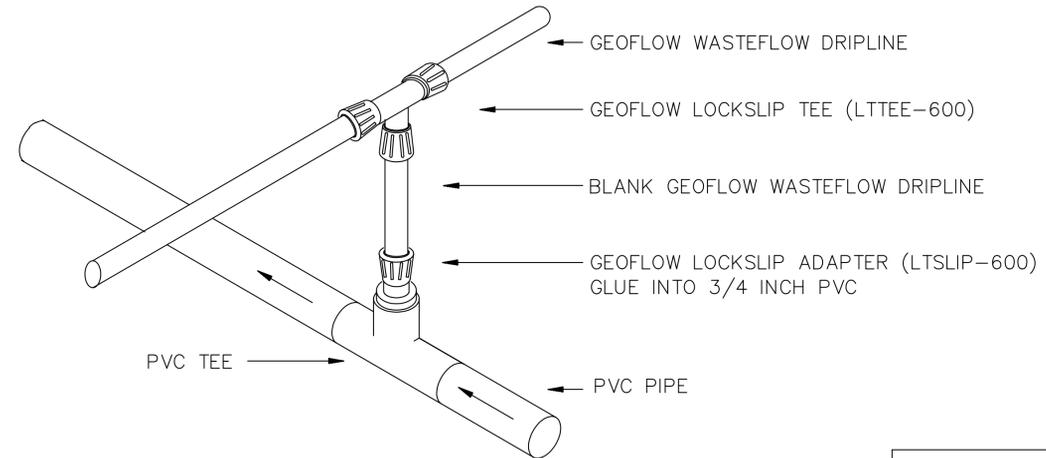


Geoflow
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 Phone 1-888-828-3388
 www.geoflow.com

Drawing Title
 Manifold Connection

Sheet	REV	Drawn by	Blank Date	Approved by
	A	HSDM	6/3/23	

Fig No.
 GF504LS_ManifoldConnection

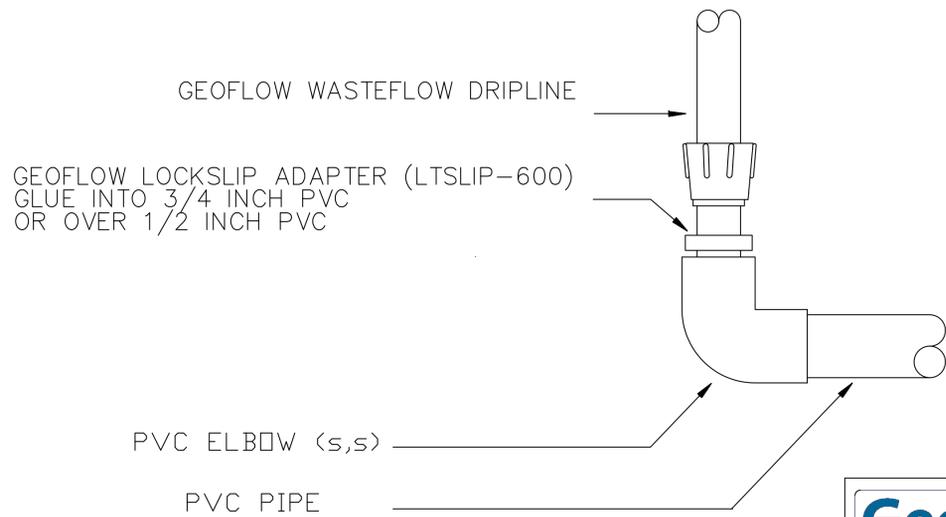


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Drawing Title
 Manifold Connection Center Feed

Sheet	REV	Drawn by	Blank Date	Approved by
	A	HDM	6/3/23	

Fig No.
 GF510_ManifoldConnection_CenterFeedRiser

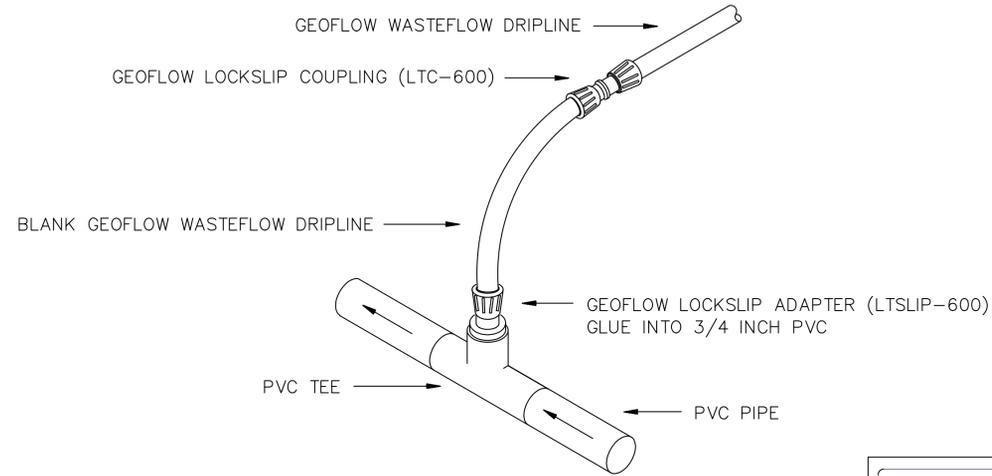


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Drawing Title
 Manifold Connection PVC Elbow

Sheet	REV	Drawn by	Blank Date	Approved by
	A	HDM	6/3/23	

Fig No.
 GF506LSManifoldConnection



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Drawing Title
 Manifold Connection - End Feed

Sheet	REV	Drawn by	Blank Date	Approved by
	A	HDM	6/3/23	

Fig No.
 GF511_ManifoldConnection_WFPlainRiserElbow

SHEET SET GROUP:
WWTP

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES
 10519 LEXINGTON DR,
 KNOXVILLE, TN 37932

CLIENT
WADE HOWELL

**HB SOUTH, 100
 MATTHEWS BLVD,
 DESTIN, FL. 32541**

PROJECT
**CAMPBELL
 HOLLOW**

**CAMPBELL HOLLOW
 ROAD, SEVIERVILLE,
 TN**

DATE CREATED
2024-01-17

DATE PRINTED
2024-07-02

DATE REVISION

SCALE
NTS

DESIGNED BY
CM

DRAWN BY
CD

CHECKED BY
CM

PROJECT NUMBER
212

SHEET TITLE
**MANIFOLD
 DETAILS**

SHEET NUM. REV.
3.3 ---



SHEET SET GROUP: **WWTP**

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES,
10519 LEXINGTON
DR, KNOXVILLE,
TN 37932

CLIENT
WADE HOWELL

**HB SOUTH, 100
MATTHEWS BLVD,
DESTIN, FL.
32541**

PROJECT
**CAMPBELL
HOLLOW**

**Campbell Hollow
Road,
Sevierville, TN**

DATE CREATED
11/7/23

DATE PRINTED
7/2/24

DATE REVISION
11-07-23

SCALE
NO SCALE

DESIGNED BY
CM

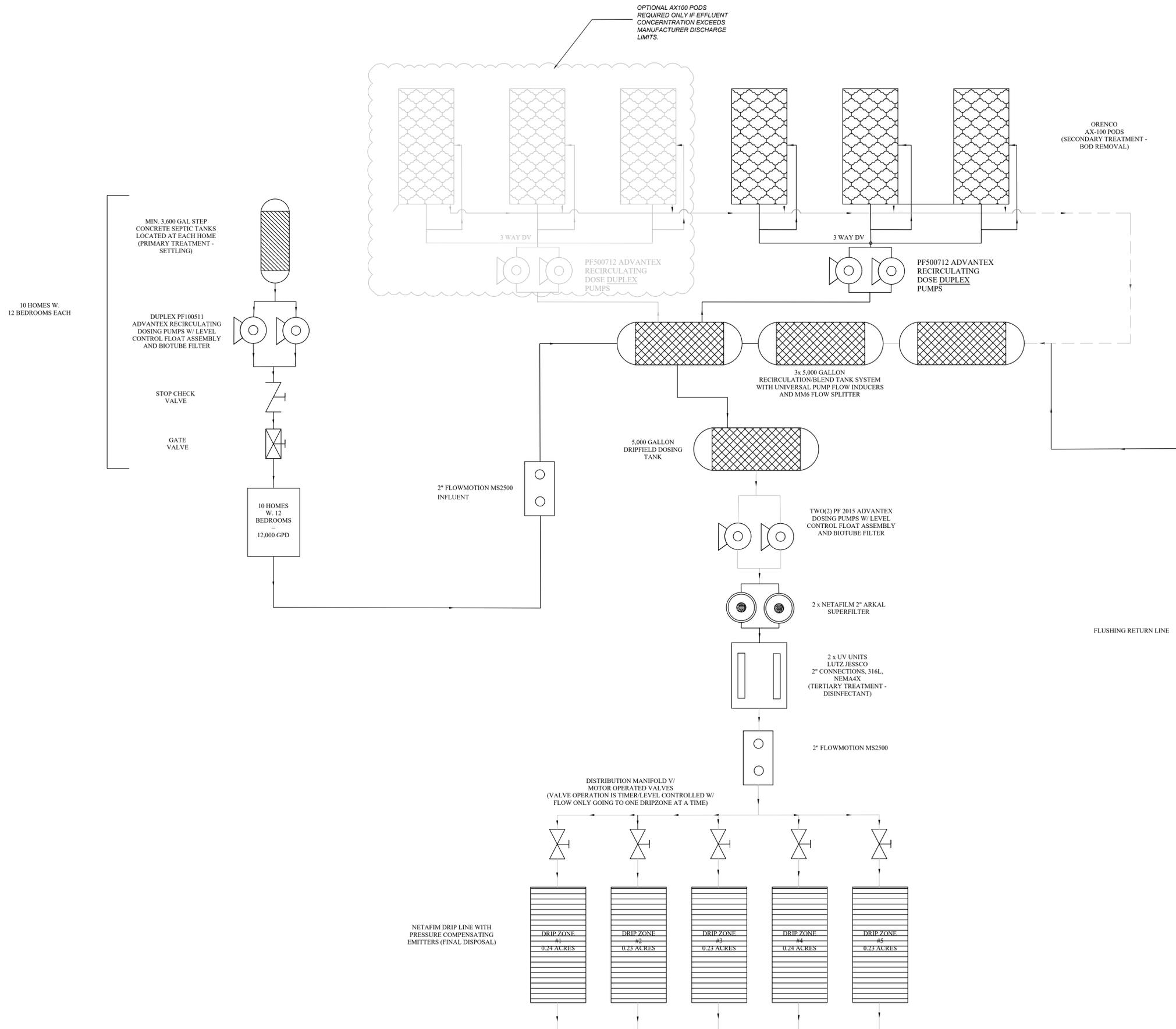
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PROJECT NUMBER
212

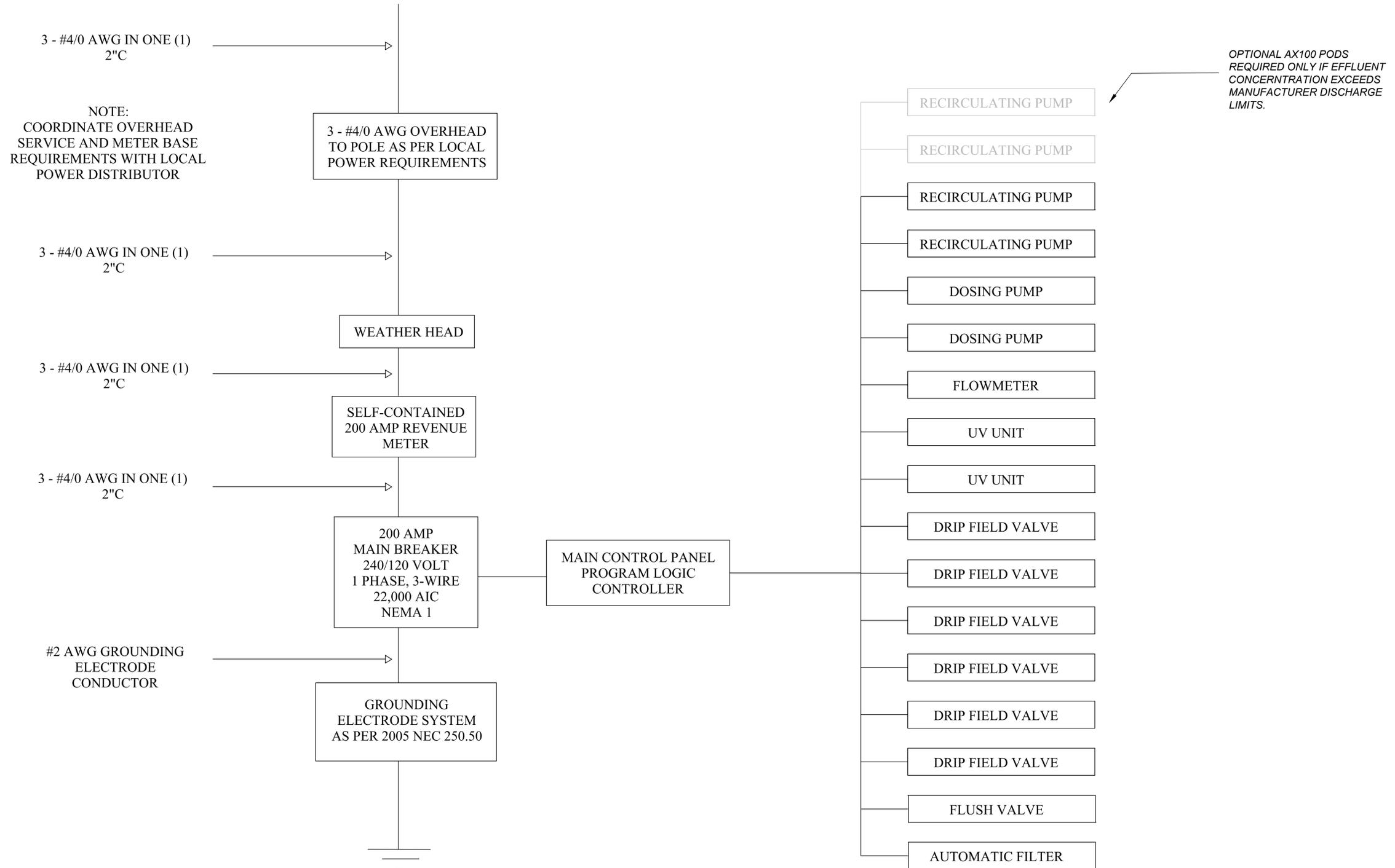
SHEET TITLE
**WWTP PROCESS
FLOW DIAGRAM**

SHEET NUM. **4.0** REV. **0**



PRIMARY POWER

SECONDARY POWER



SHEET SET GROUP: **WWTP**

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES,
10519 LEXINGTON DR, KNOXVILLE, TN 37932

CLIENT
WADE HOWELL

HB SOUTH, 100 MATTHEWS BLVD, DESTIN, FL. 32541

PROJECT
CAMPBELL HOLLOW

Campbell Hollow Road, Sevierville, TN

DATE CREATED **11/7/23**

DATE PRINTED **7/2/24**

DATE REVISION **11-07-23**

SCALE **NO SCALE**

DESIGNED BY **CM**

DRAWN BY **CD**

CHECKED BY **CM**

PROJECT NUMBER **212**

SHEET TITLE
ELECTRICAL ONE LINE DIAGRAM

SHEET NUM.	REV.
5.0	0

COLLECTION SYSTEM LEGEND

	AIR RELIEF VALVE
	CHECK VALVE
	GATE VALVE
	DISCONNECT BOX
	IN-LINE CLEAN OUT
	END LINE CLEAN OUT
	FORCE MAIN 2"
	FORCE MAIN 4"
	1.5" GRAVITY COLLECTION



SHEET SET GROUP: **WWTP**

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES,
10519 LEXINGTON
DR, KNOXVILLE,
TN 37932

CLIENT
WADE HOWELL

**HB SOUTH, 100
MATTHEWS BLVD,
DESTIN, FL.
32541**

PROJECT
**CAMPBELL
HOLLOW**

**Campbell Hollow
Road,
Sevierville, TN**

DATE CREATED
11/7/23

DATE PRINTED
7/2/24

DATE REVISION
11-07-23

SCALE
1" = 50'

DESIGNED BY
CM

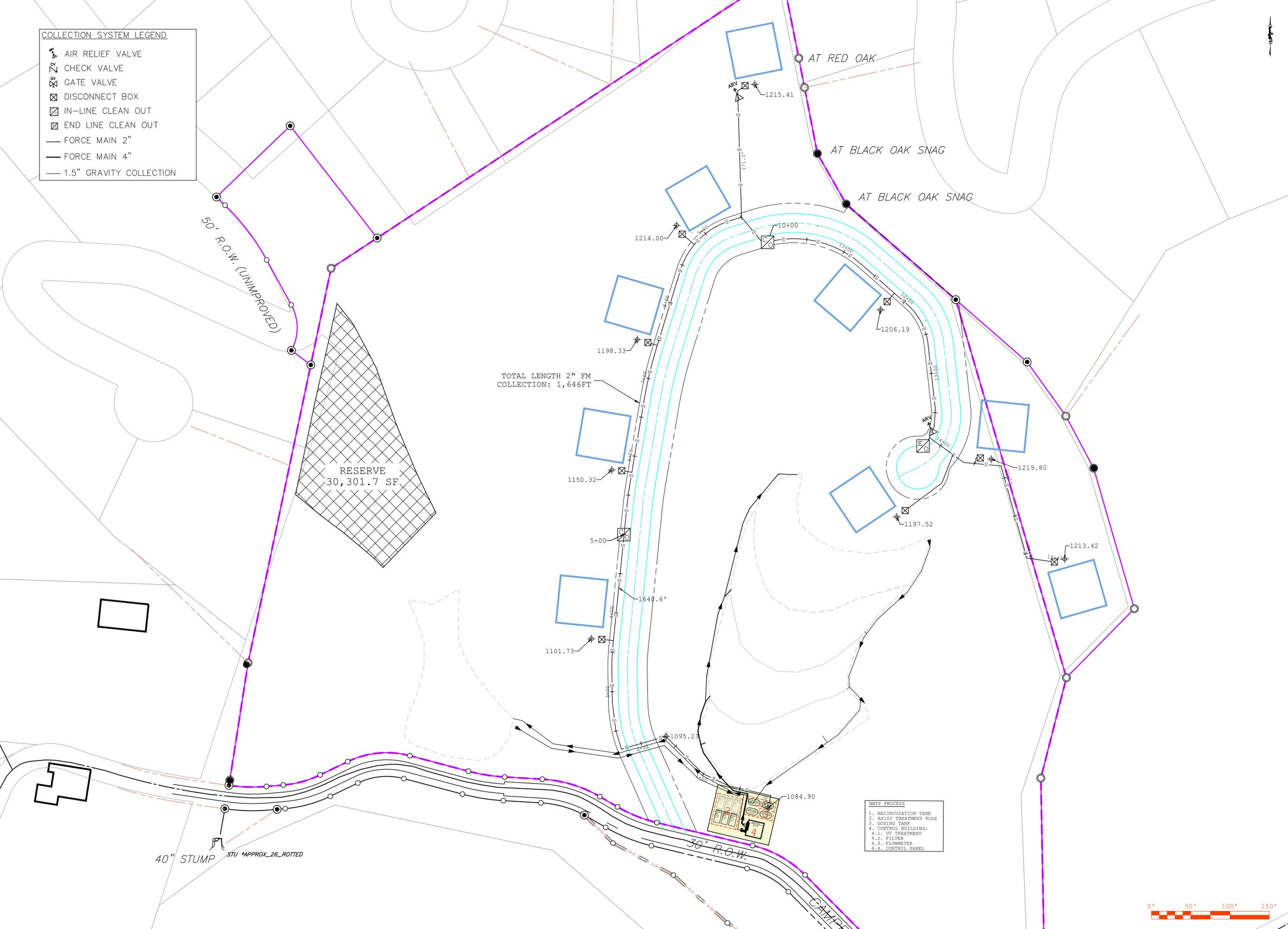
DRAWN BY
CD

CHECKED BY
CM

PROJECT NUMBER
212

SHEET TITLE
**WASTEWATER
COLLECTION
SYSTEM**

SHEET NUM.	REV.
6.0	0



WWTP PROCESS

1. RECIRCULATION TANK
2. AX100 TREATMENT PODS
3. DOSING TANK
4. CONTROL BUILDING:
 - 4.1. UV TREATMENT
 - 4.2. FILTER
 - 4.3. FLOWMETER
 - 4.4. CONTROL PANEL

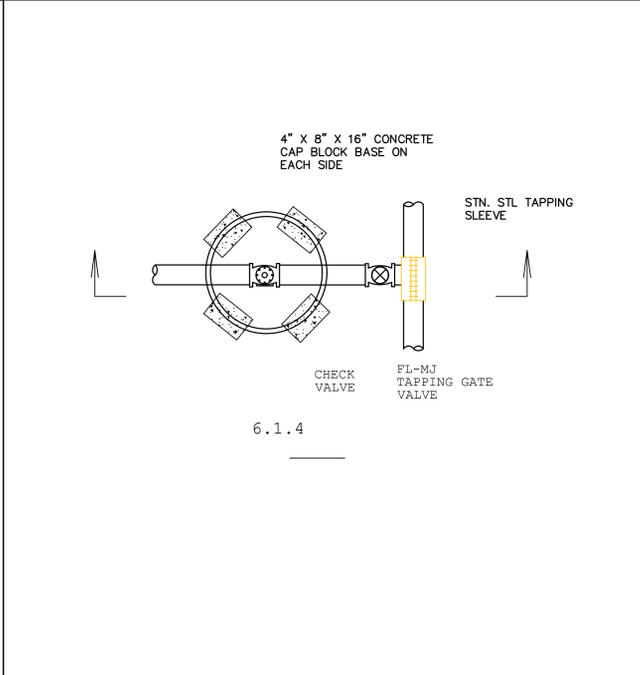
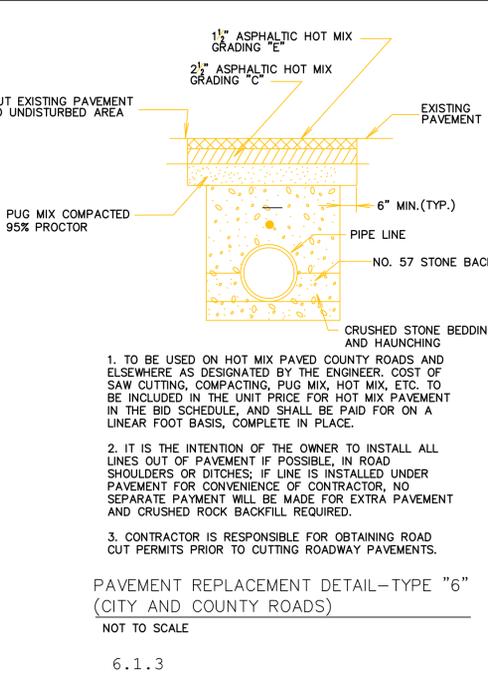
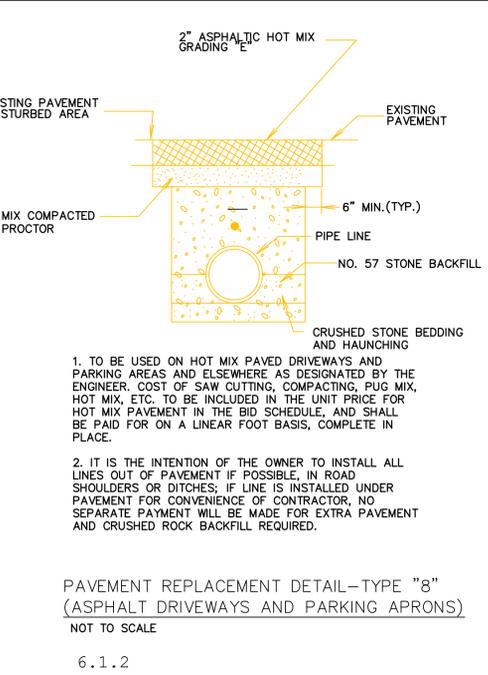
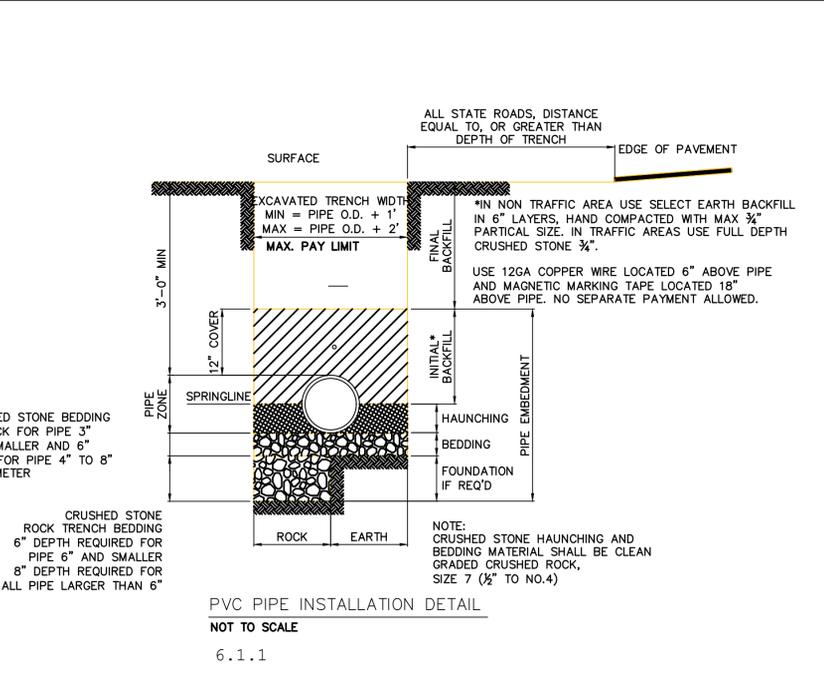
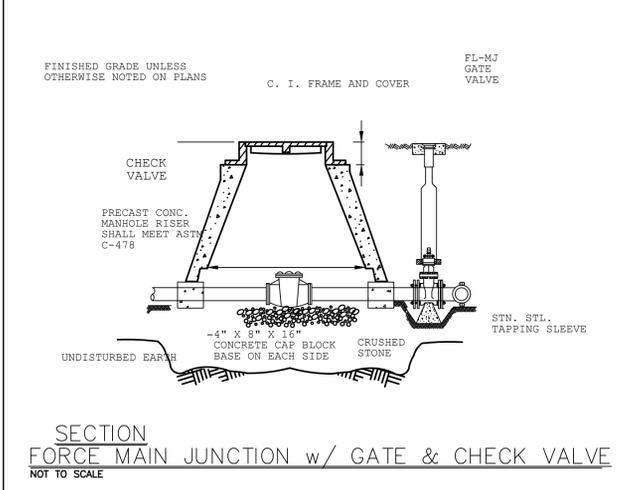
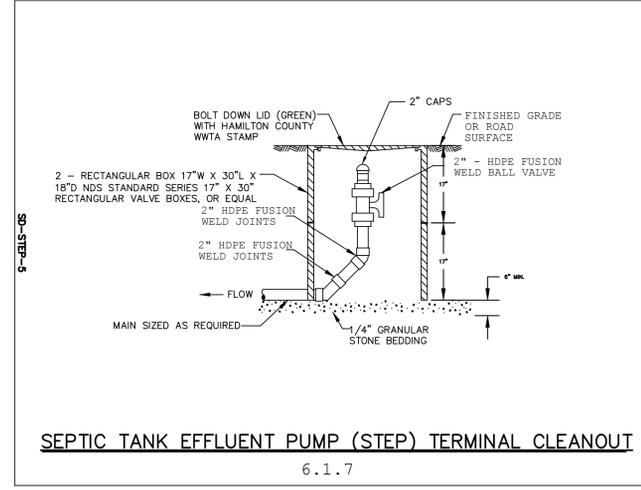
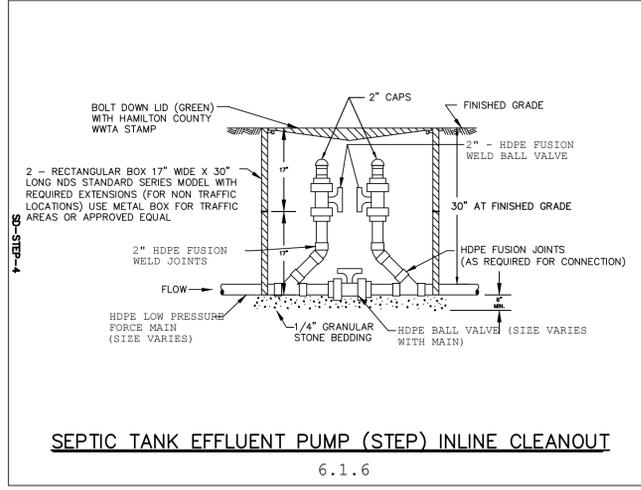
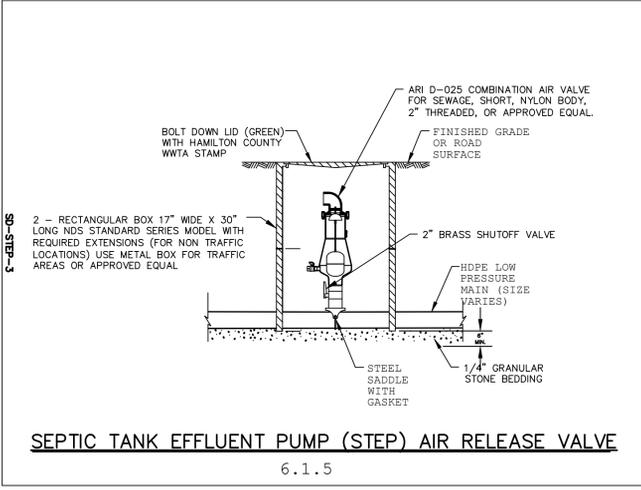
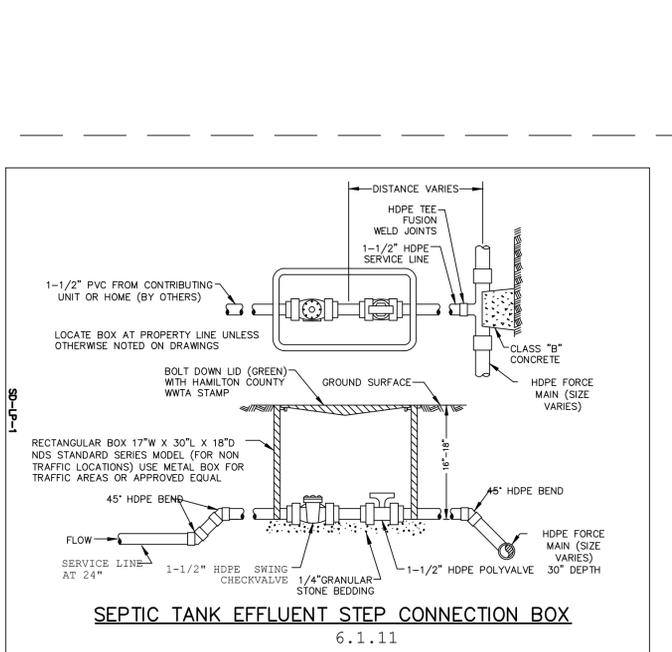
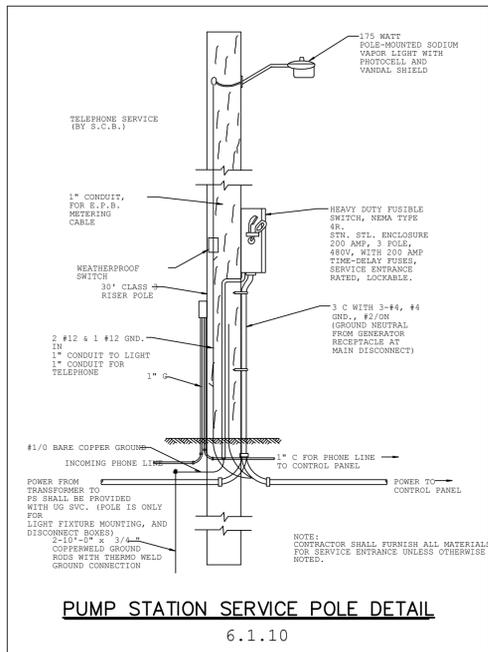
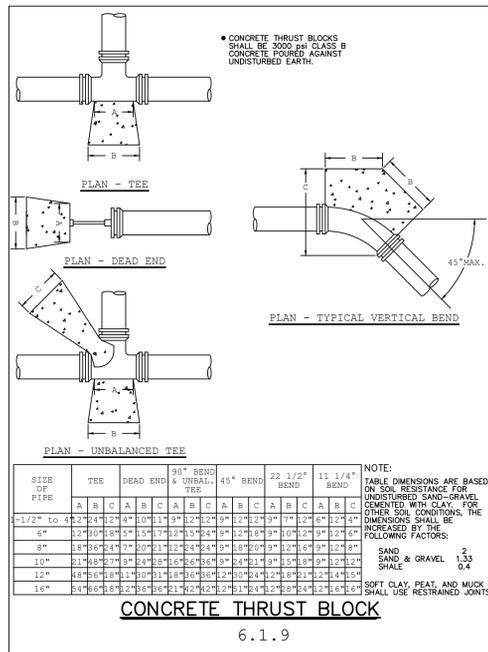
TOTAL LENGTH 2" FM
COLLECTION: 1,646FT

RESERVE
30,301.7 SF

40" STUMP STU *APPROX_26_ROTATED

30' R.O.W.

CAMPBELL HOLLOW



SHEET SET GROUP: WWTP

ENGINEER: CODY MCELROY PE

DSH & ASSOCIATES, 10519 LEXINGTON DR, KNOXVILLE, TN 37932

CLIENT: WADE HOWELL

HB SOUTH, 100 MATTHEWS BLVD, DESTIN, FL. 32541

PROJECT: CAMPBELL HOLLOW

Campbell Hollow Road, Sevierville, TN

DATE CREATED: 11/7/23

DATE PRINTED: 7/2/24

DATE REVISION: 11-07-23

SCALE: #####

DESIGNED BY: CM

DRAWN BY: CD

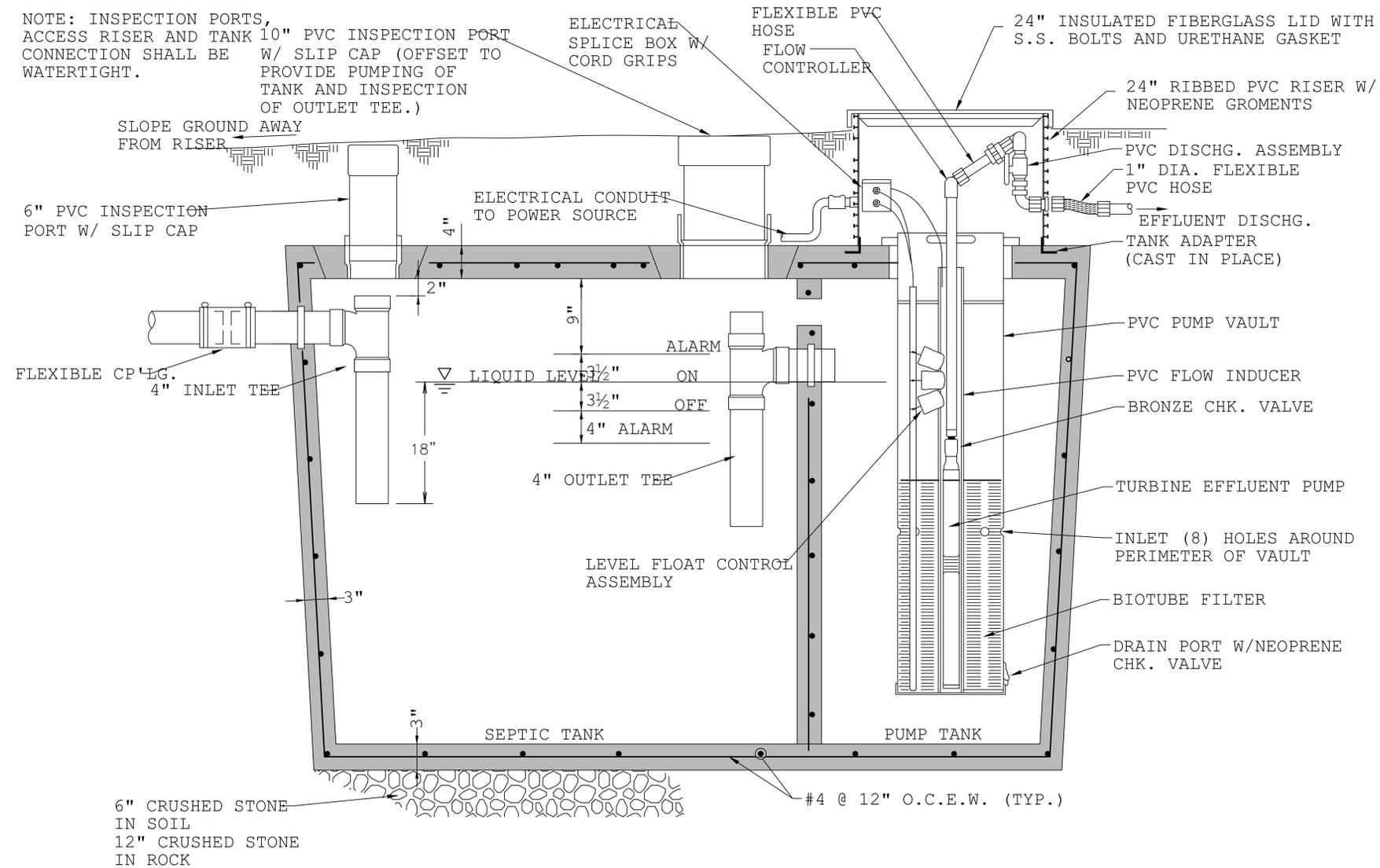
CHECKED BY: CM

PROJECT NUMBER: 212

SHEET TITLE: COLLECTION SYSTEM DETAILS

SHEET NUM.: 6.1

REV.: 0



STEP tank pump	Orengo PF1005
Dosing pump spec	Orengo PF2015
Recirc pump spec	Orengo PF5007

TABLE 1
PUMP SPECIFICATION

SHEET SET GROUP: WWTP

ENGINEER
CODY MCELROY PE

DSH & ASSOCIATES,
10519 LEXINGTON DR, KNOXVILLE, TN 37932

CLIENT
WADE HOWELL

HB SOUTH, 100 MATTHEWS BLVD, DESTIN, FL. 32541

PROJECT
CAMPBELL HOLLOW

Campbell Hollow Road, Sevierville, TN

DATE CREATED 11/7/23

DATE PRINTED 7/2/24

DATE REVISION 11-07-23

SCALE #####

DESIGNED BY CM

DRAWN BY CD

CHECKED BY CM

PROJECT NUMBER 212

SHEET TITLE
COLLECTION TANK DETAILS

SHEET NUM. 6.2 REV. 0

SEPTIC TANK EFFLUENT PUMP (STEP) INSTALLATION DETAIL

Septic tank sizing per home				
Flow/bedroom	100 GPD			
Min volume	3 x daily flow			
Beds per home	Daily flow	Min. tank volume	Selected tank	
Num	GPD	GAL	GAL	
2	200	600	1,000	
3	300	900	1,000	
4	400	1,200	1,500	
5	500	1,500	1,500	
6	600	1,800	2,000	
7	700	2,100	2,100	
8	800	2,400	2,500	
9	900	2,700	3,000	
10	1,000	3,000	3,000	

* add 300 GAL for each additional bedroom

DR 4 – STATE OPERATOR CERTIFICATE

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

I.D. NO.

2289

EXPIRATION DATE

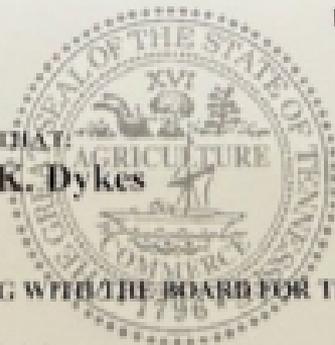
12/31/2025

THIS IS TO CERTIFY THAT:

Darian K. Dykes

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

WW4, CS2



DR 5 – UPDATED PRO FORMA

INCOME STATEMENT

	Year 1	Year 2	Year 3	
OPERATING REVENUE				NARUC ACCOUNT
Metered service revenue	\$ -	\$ -	\$ -	
Flat rate service revenue	\$ 6,270	\$ 6,270	\$ 6,270	521.00
Re-connect fees	\$ 132	\$ 132	\$ 132	536.00
Returned check charge	\$ 66	\$ 66	\$ 66	536.00
Late payment charge	\$ 132	\$ 132	\$ 132	532.00
Total Operating Revenue	\$ 6,600	\$ 6,600	\$ 6,600	
OPERATING EXPENSES				
Outside labor expenses (non-employees)	\$ 33,217	\$ 33,217	\$ 33,217	730.00
Administrative and office expense	\$ 744	\$ 744	\$ 744	922.00
Maintenance and repair expense	\$ 10,439	\$ 10,439	\$ 10,439	730.00
Electric power expense (exclude office)	\$ 7,204	\$ 7,204	\$ 7,204	715.00
Chemicals expense	\$ 5,420	\$ 5,420	\$ 5,420	718.00
Other operating expense	\$ 360	\$ 360	\$ 360	775.00
Total Operating Expenses	\$ 57,385	\$ 57,385	\$ 57,385	
Annual Depreciation Expense	\$ 9,660	\$ 9,660	\$ 9,660	403.00
Total Expenses	\$ 67,045	\$ 67,045	\$ 67,045	
INCOME TAXES				
Total Income Taxes	\$ -	\$ -	\$ -	
Net income (Loss)	\$ (60,445)	\$ (60,445)	\$ (60,445)	

	Capital Budget		
	Year 1	Year 2	Year 3
Acquisition	\$ -		
Improvements	\$ -		
Reinvestment of Depreciation	\$ 9,660	\$ 9,660	\$ 9,660

ASSUMPTIONS	
Acq Date	
Step Rate Date	\$ -
Final Rate Date	\$ -
Water Connections	-
Water Initial Rate	\$ -
Water Step Rate	\$ -
Water Final Rate	\$ -
Wastewater Connections	10
Wastewater Initial Rate	\$ 55.00
Wastewater Step Rate	\$ -
Wastewater Final Rate	\$ -
Debt Percent	50.0%
Delinquent Account Percent	0.8%
State Tax Rate	6.5%
Federal Tax Rate	21.0%
Depreciation Rate	3.5%
Interest Rate	0.0%
Loan Term Length	240
Loan Origination	1.0%
Insurance Premium	0.0%
Acquisition Cost	\$ -
L&E Cost	\$ -
CAPEX Cost	\$ -
Outside Labor Expense	\$ 2,768
Customer Service	\$ 30
Repairs	\$ 870
Power	\$ 600
Chemicals	\$ 452
Purchased Water	\$ -
Purchased Wastewater	\$ -
Testing Fees	\$ -
Administrative Expense	\$ 62

LIMESTONE NOVs



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
Davy Crockett Tower
500 James Robertson Parkway, 9th Floor
Nashville, Tennessee 37243

Apr 15, 2025
Mr. Brad Thibault
Limestone Utility Candlewood Lakes
389 Candlewood Drive
Saulsbury, TN 38067
P. O. Box 158
Wartrace, Tennessee 37138

Subject: **DIRECTOR'S ORDER NO. DWS24-0053
LIMESTONE UTILITY – CANDLEWOOD LAKES
HARDEMAN COUNTY, TENNESSEE
DEMAND LETTER**

Sent via email to: bthibault@cswrgroup.com & krista@cswrgroup.com

Dear Mr. Thibault,

The Settlement Agreement and Order DWS24-0053 for Limestone Utility - Candlewood Lakes was signed on February 5, 2025. The Settlement Agreement and Order specified that the upfront penalty of \$4,534 was to be paid 31 days after signature. The Settlement Agreement and Order also stipulated that proof of hiring an engineer must be submitted 30 days after signature, and the design plans from the engineer were to be submitted 60 days after signature. These two requirements each carries a penalty of \$1,000.00. The sum if \$6,534 is now due upon receipt of this letter. Please be advised that 90 days after signature of the Settlement Agreement and Order Limestone Utility is required to submit proof of hiring a drilling company licensed in the State of Tennessee to avoid the penalty of \$4,000.00. I am enclosing a copy of the Settlement Agreement and Order for your convenience.

Payment should be submitted to the following address, including Order DWS24-0053 on the check.

Treasurer, State of Tennessee
Division of Fiscal Services, Consolidated Fees
TN Department of Environment and Conservation
Davy Crockett Tower
500 James Robertson Parkway, 6th Floor
Nashville, Tennessee 37243

Apr 15, 2025

Mr. Brad Thibault

Letter

Page 2

If you or your attorney has questions concerning this correspondence, please contact Tom Moss at (615) 917-4135 or you may contact Jessica Murphy at (615) 390-0675.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Murphy".

Jessica Murphy, Manager
Compliance and Enforcement Unit

EJM: TAM

cc: DWR – EFO-M

DWR – Enforcement File

OGC (via email)



July 24, 2025

Jessica Murphy, Manager
Enforcement and Compliance Unit
Division of Water Resources
Davy Crockett Tower
500 James Robertson Pkwy, 9th Floor
Nashville, Tennessee 37243

**RE: Cartwright Creek - Hideaway WWTP
SOP No. SOP-07090
Thompson Station, Williamson Co., TN
Case number – WPC23-0125**

Dear Ms. Murphy,

This letter is submitted in response to your July 10th, 2025 Order and Demand letter regarding Hideaway WWTP located in Williamson County. The goal of this letter is to request an extension for the corrective action requiring an Engineering Report submittal.

TDEC verbiage of corrective action:

1. *“The Respondent shall submit an Engineering Report (ER), to the Division, for its approval, within forty-five days after receipt of this Order. The report shall include plans to operate 10 or modify the facility to treat the current flow rate effectively, as well as how the facility will change or upgrade to handle additional flow should the remaining connections be established for the original design flow. In the ER a solids handling process shall be established for the current flow and if the flow were to increase. The solids handling equipment must be maintained per the approved designs submitted to the Division and all solids shall be disposed of in accordance with 40 CFR § 503 et seq. A project schedule with milestone completion dates for any intended upgrades or operational modifications shall be provided.”*

Limestone UOC request:

1. Due to the requirements, Limestone UOC must contract the requested requirement for an engineering report to a firm that has a licensed P.E. The engineering firm has stated that they would need a 90-day extension to conduct a site visit and research data to be able to perform the duties mandated. This would extend the due date to October 22nd 2025. Also given the extensive backdate of the violations, it will require a larger investigation to ensure diligence and accuracy.



LIMESTONE WATER

Utility Operating Company

A CSWR Managed Utility

We appreciate your consideration of this extension request and Limestone Water UOC remain committed to resolving these compliance matters responsibly and promptly. Please do not hesitate to contact me via email at JJJOHNSON@CSWRGROUP.COM should you require additional documentation or clarification.

Sincerely,

Joe Johnson

Joe Johnson

CSWR – EHS Compliance Coordinator