

STATE OF TENNESSEE

Office of the Attorney General



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October 3, 2025

IRM Utility, Inc.
c/o Charles B. Welch, Jr
414 Union Street, Suite 1105
Nashville, Tennessee 37219
(615) 726-1200
Chuck.welch@phelps.com

Electronically Filed in TPUC Docket Room
on October 3, 2025 at 3:40 p.m.

Re: *Application of Integrated Resource Management, Inc. for a Certificate of Public Convenience and Necessity for River Gorge Ranch*, TPUC Docket No. 25-00075

Mr. Cox:

The Consumer Advocate has reviewed the *Petition* filed by Integrated Resource Management, Inc. ("IRM") in the above-referenced Docket.

The Consumer Advocate appreciates the time and effort that the Applicant put into compiling the *Petition*, as well as the Applicants' attention to the Commission's minimum filing requirements. However, the Consumer Advocate could not locate, and thus seeks clarification on, the items set forth below, relating to compliance with TPUC Rule 1220-04-01-.13. Please note that this is not a discovery request by the Consumer Advocate, but a review of IRM's compliance with TPUC's minimum filing requirements.

The Consumer Advocate would like to thank the Applicant in advance for their attention to the Consumer Advocate's requests. If you have questions regarding this request, please contact me at (615) 741-8733.

Respectfully,

A handwritten signature in cursive script that reads "Vance L. Broemel".

Vance L. Broemel
Senior Deputy Attorney General

cc: Jeffrey Cox, Jr.
Joshua Mayorquin, Phelps

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

1. ***Rule 1220-04-13-.17(2)(a)4.*** The rule states that if applicant has affiliated companies, provide a corporate organization chart showing all affiliate relationships. Describe in detail any transactions, direct or indirect, that occur or are expected to occur between affiliated entities. The Company filed Exhibit 10 and in the Appendix A for this rule they state “A detailed list of transactions between affiliated entities is included in the Annual Reports.” However, the Annual Report was not filed as part of this Petition. Either file a detailed list of transactions between affiliated entities or a copy of the Annual Report in the Docket.
2. ***Rule 1220-04-13-.17(2)(a)8.*** The rule asks for a 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. After review of the Petition and Exhibits, the Consumer Advocate found in the Appendix A, 7(v) the Company states “IRM is seeking to provide water and wastewater services.” File confirmation in the Docket if IRM is seeking to provide both water and wastewater or just wastewater.

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

1. ***Rule 1220-04-13-.17(2)(c)4.*** 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. After reviewing the Company's complete filing the Consumer Advocate could not locate the identity of the builder or a contractor's license. File the name of the contractor and provide its Tennessee license in the Docket.

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. The Consumer Advocate could not locate the letter from TDEC referenced in Appendix A of the Company's filing. After a review of TDEC's dataviewer the Consumer Advocate could not locate any information as to whether the application was complete or incomplete. Per Appendix A, a Letter from TDEC is included in Exhibit 3. File the missing letter in the Docket.

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. After review of the Company's filing and response in Appendix A, it appears this rule was misread. The Company's answer in Appendix A refers to the SOP (exhibit 3) but this rule is asking for the State Operator Certificate for the individual that will operate the system. File this in required certificate in the Docket.
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 responded to this rule in Appendix A stating that they are not aware of any complaints/notices/actions by any state, federal, or local agency. The Consumer Advocate found no formal admin orders or complaints. However, the Consumer Advocate did locate the following using TDEC's dataviewer:¹
 1. **SOP-08013 Cove Creek Resort**
 - a. Effluent bypassing or discharging from system (1/8/2024); and
 - b. cleared up in follow-up visit on (6/21/2024).
 2. **SOP-05054 Sterling Springs S/D**
 - a. land application is wooded/forest, saturated soils, ponding etc (1/20/2024);
 - b. land application is wooded/forest - see note in doc (8/8/2024); and
 - c. land application is wooded/forest - see note in doc, saturated soils, ponding, overland overflow, etc & see note on doc (12/18/2024)
 3. **SOP-18012 Waterside on Douglas Lake** – need fencing and signage (1/29/2024).
 4. **SOP-03034 Spaulding Bed & Breakfast** – land application is wooded/forest (2/2/2024).
 5. **SOP-04012 Emory Point Subdivision** – TDEC does not have monthly operations reports since June 2020-June 2024.

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

1. **Rule 1220-04-13-.17(2)(e)2.** The rule asks for pro forma 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 the Company's filing, including Exhibit 7, but all the information was not included. File a corrected Exhibit 7 that includes number of customers, the rates, O&M

¹ Exhibit CA-1 is attached with the documents listed in this section.

expenses by account number, and basis and/or assumptions used to arrive at said totals in this Docket.

2. **Rule 1220-04-13-.17(2)(e)5.** The rule asks for the depreciation rates the applicant intends to use for each plant account that will be on the wastewater utility's books. Include the estimated useful life of each account. If no depreciation study has been performed, explain the basis for these rates. Appendix A states "IRM is using the most recently approved depreciation rates by the Commission." File the approved depreciation rates in this Docket.
3. **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 reviewed the Petition and Exhibit 2 but could not provide a detailed estimate or a total estimate. File a corrected exhibit in the Docket.
4. **Rule 1220-04-13-.17(2)(e)9.** This rule requires 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 Consumer Advocate has reviewed the Petition and Exhibits 3, 4, and 5 but could not locate all the answers to this rule. There were no customer projections or financial information by month. Also, per the rule, this information should be shared in excel and there were not any excel documents shared with this Docket. File corrected exhibits to satisfy this rule in the Docket.
5. **Rule 1220-04-13-.17(2)(e)13.** The rule asks for information demonstrating compliance with the financial security requirement of Rule 1220-04-13-.07. The Company states this information is on file with the Commission. File the requested information in this Docket.

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

1. **Rule 1220-04-13-.17(2)(f)1.** The rule requires the testimony provide evidence that a public need exists for wastewater services in the proposed service area. In reviewing the Petition, the Consumer Advocate could not find such evidence in the testimony. However, the Company provided a letter from Marion County as Exhibit 11 to the Petition.
2. **Rule 1220-04-13-.17(2)(f)3.** The rule asks for a statement that the applicant is aware of and will abide by all applicable TN statutes and TPUC Rules. This was not stated in the Testimony or anywhere in the Company's filing. File corrected Testimony in the Docket.
3. **Rule 1220-04-13-.17(2)(f)4.** The rule requires the testimony provide a discussion and demonstration of technical, managerial, and financial capability of the applicant to

provide the proposed wastewater service. In reviewing the Petition, the Consumer Advocate could not find such language in the testimony. However, the Company provided a discussion of its technical, managerial, and financial capability in the Petition a PDF pp. 4-5 of 21.

4. ***Rule 1220-04-13-.17(2)(f)5.*** The rule asks for a statement that the applicant is aware of the requirement of Rule 1220-04-13-.09(7) concerning the completion of the construction of the wastewater system within three years of TPUC's written approval of the CCN. This was not stated in the Testimony or anywhere in the Company's filing. File corrected Testimony in the Docket.
5. ***Rule 1220-04-13-.17(2)(f)6.*** The rule requires the testimony provide a signed affidavit stating that all information submitted concerning the wastewater CCN application is true and correct to the best of the witness' knowledge and belief. In reviewing the Petition, the Consumer Advocate could not find such language in the affidavit. However, there is such a statement in Mr. Cox's testimony on p. 20, Q/A11.

SOP Drip Field Special Investigation:

Inspector: Michael Caudill

Date: January 08, 2024

SOP Tracking Number & Site:

SOP-08013 - IRM Utility, Inc.-Cove Creek Resort

Was there a representative of the operating entity present during the site visit?

Yes No

Operating entity representative:

This system is serving: Cabins/Resort

Is there any evidence of effluent bypassing or discharging from the treatment unit or around the treatment unit?

Yes No Unknown NA

Approximate Drip Field Location: 35.721578, -83.640698

Specify the drip field if there is more than one associated with this permit:

Is the land application area well defined (i.e., fence, signs, upkeep)?

Yes No Unknown NA

Is the land application area(s) readily accessible to support walk-through?

Yes No Unknown NA

Is vegetation on the land application area:

Well maintained Moderately maintained

Overgrown Wooded or Forest

Other: _____

Is there evidence of hydraulically overloaded soil conditions within the land application area?

Yes No Unknown NA

Does this evidence include the presence of saturated soil conditions?

Yes No Unknown NA

Does the evidence include the presence of ponded effluent?

Yes No Unknown NA

Does the evidence include observations of long-term ponding?

Yes No Unknown NA

Were photos or videos of these observations collected?

Yes No Unknown NA

If ponded conditions are present, are they localized as may be expected with a broken pipe, damaged valve, or damaged pressure relief valve?

Yes No Unknown NA

If ponded conditions are present, are they over a larger area or dosing zone as may be expected with overloaded soil conditions?

Yes No Unknown NA

Are ponded conditions resulting in overland flow?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area and enter surface waters or drainage features that lead to surface waters?

Yes No Unknown NA

Is there any indication that a dosing cycle occurred during the inspection?

SOP-08013 - IRM Utility, Inc.-Cove Creek Resort

Yes No Unknown NA

Have there been any recent precipitation events that would serve to influence any of the observations made during this site visit?

Yes No Unknown NA

Date of precipitation event:

Amount of precipitation (in.):

Are drip dispersal lines exposed?

Yes No Unknown NA

Is this by design or otherwise?

Are there any indications of land application system damage?

Yes No Unknown NA

What is the estimated distance between the drip lines in feet?

0.5 1.0 1.5 2.0 2.5 3.0

3.5 4.0 4.5 5.0 5.5 6.0

7.0 7.5 8.0 8.5 9.0 9.5

10.0 10.5 Unknown NA

Other: _____

Is a follow-up site visit necessary?

Yes No Unknown NA

Notes:

Ponding in multiple areas.

Photos (6):













SOP Drip Field Special Investigation:

Inspector: William Luke

Date: June 21, 2024

SOP Tracking Number & Site:

SOP-08013 - IRM Utility, Inc.-Cove Creek Resort

Was there a representative of the operating entity present during the site visit?

Yes No

Operating entity representative: Tyler Mead

This system is serving: RV Park

Is there any evidence of effluent bypassing or discharging from the treatment unit or around the treatment unit?

Yes No Unknown NA

Approximate Drip Field Location: 35.722644, -83.640211

Specify the drip field if there is more than one associated with this permit:

Is the land application area well defined (i.e., fence, signs, upkeep)?

Yes No Unknown NA

Is the land application area(s) readily accessible to support walk-through?

Yes No Unknown NA

Is vegetation on the land application area:

Well maintained Moderately maintained
 Overgrown Wooded or Forest
 Other: _____

Is there evidence of hydraulically overloaded soil conditions within the land application area?

Yes No Unknown NA

Does this evidence include the presence of saturated soil conditions?

Yes No Unknown NA

Does the evidence include the presence of ponded effluent?

Yes No Unknown NA

Does the evidence include observations of long-term ponding?

Yes No Unknown NA

Were photos or videos of these observations collected?

Yes No Unknown NA

If ponded conditions are present, are they localized as may be expected with a broken pipe, damaged valve, or damaged pressure relief valve?

Yes No Unknown NA

If ponded conditions are present, are they over a larger area or dosing zone as may be expected with overloaded soil conditions?

Yes No Unknown NA

Are ponded conditions resulting in overland flow?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area and enter surface waters or drainage features that lead to surface waters?

Yes No Unknown NA

Is there any indication that a dosing cycle occurred during the inspection?

SOP-08013 - IRM Utility, Inc.-Cove Creek Resort

Yes No Unknown NA

Have there been any recent precipitation events that would serve to influence any of the observations made during this site visit?

Yes No Unknown NA

Date of precipitation event:

Amount of precipitation (in.):

Are drip dispersal lines exposed?

Yes No Unknown NA

Is this by design or otherwise?

Are there any indications of land application system damage?

Yes No Unknown NA

What is the estimated distance between the drip lines in feet?

0.5 1.0 1.5 2.0 2.5 3.0

3.5 4.0 4.5 5.0 5.5 6.0

7.0 7.5 8.0 8.5 9.0 9.5

10.0 10.5 Unknown NA

Other: _____

Is a follow-up site visit necessary?

Yes No Unknown NA

Notes:

Any issues identified during previous inspection have been remedied and are no longer causing ponding of effluent. System appears to be functioning properly at time of inspection..

Photos (5):











SOP Drip Field Special Investigation:

Inspector: Michael Caudill

Date: January 30, 2024

SOP Tracking Number & Site:

SOP-05054 - Integrated Resource Management, Inc. - Sterling Springs S/D

Was there a representative of the operating entity present during the site visit?

Yes No

Operating entity representative:

This system is serving: Cabins/Resort

Is there any evidence of effluent bypassing or discharging from the treatment unit or around the treatment unit?

Yes No Unknown NA

Approximate Drip Field Location: 35.849127, -83.610411

Specify the drip field if there is more than one associated with this permit:

Is the land application area well defined (i.e., fence, signs, upkeep)?

Yes No Unknown NA

Is the land application area(s) readily accessible to support walk-through?

Yes No Unknown NA

Is vegetation on the land application area:

Well maintained Moderately maintained

Overgrown Wooded or Forest

Other: _____

Is there evidence of hydraulically overloaded soil conditions within the land application area?

Yes No Unknown NA

Does this evidence include the presence of saturated soil conditions?

Yes No Unknown NA

Does the evidence include the presence of ponded effluent?

Yes No Unknown NA

Does the evidence include observations of long-term ponding?

Yes No Unknown NA

Were photos or videos of these observations collected?

Yes No Unknown NA

If ponded conditions are present, are they localized as may be expected with a broken pipe, damaged valve, or damaged pressure relief valve?

Yes No Unknown NA

If ponded conditions are present, are they over a larger area or dosing zone as may be expected with overloaded soil conditions?

Yes No Unknown NA

Are ponded conditions resulting in overland flow?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area and enter surface waters or drainage features that lead to surface waters?

Yes No Unknown NA

Is there any indication that a dosing cycle occurred during the inspection?

Yes No Unknown NA

Have there been any recent precipitation events that would serve to influence any of the observations made during this site visit?

Yes No Unknown NA

Date of precipitation event:

Amount of precipitation (in.):

Are drip dispersal lines exposed?

Yes No Unknown NA

Is this by design or otherwise?

Tree damage

Are there any indications of land application system damage?

Yes No Unknown NA

What is the estimated distance between the drip lines in feet?

0.5 1.0 1.5 2.0 2.5 3.0
 3.5 4.0 4.5 5.0 5.5 6.0
 7.0 7.5 8.0 8.5 9.0 9.5
 10.0 10.5 Unknown NA
 Other: _____

Is a follow-up site visit necessary?

Yes No Unknown NA

Notes:

Photos (6):













SOP Drip Field Special Investigation:

Inspector: Eric Ball

Date: August 08, 2024

SOP Tracking Number & Site:

SOP-05054 - Integrated Resource Management, Inc. - Sterling Springs S/D

Was there a representative of the operating entity present during the site visit?

Yes No

Operating entity representative: Bill Cox

This system is serving: Cabins/Resort

Is there any evidence of effluent bypassing or discharging from the treatment unit or around the treatment unit?

Yes No Unknown NA

Approximate Drip Field Location: 35.84917, -83.609356

Specify the drip field if there is more than one associated with this permit:

Two separate drip beds, lower bed is located at end of gravel road past treatment unit.
Upper drip bed is on towering oaks road

Is the land application area well defined (i.e., fence, signs, upkeep)?

Yes No Unknown NA

Is the land application area(s) readily accessible to support walk-through?

Yes No Unknown NA

Is vegetation on the land application area:

Well maintained Moderately maintained

Overgrown Wooded or Forest

Other: _____

Is there evidence of hydraulically overloaded soil conditions within the land application area?

Yes No Unknown NA

Does this evidence include the presence of saturated soil conditions?

Yes No Unknown NA

Does the evidence include the presence of ponded effluent?

Yes No Unknown NA

Does the evidence include observations of long-term ponding?

Yes No Unknown NA

Were photos or videos of these observations collected?

Yes No Unknown NA

If ponded conditions are present, are they localized as may be expected with a broken pipe, damaged valve, or damaged pressure relief valve?

Yes No Unknown NA

If ponded conditions are present, are they over a larger area or dosing zone as may be expected with overloaded soil conditions?

Yes No Unknown NA

Are ponded conditions resulting in overland flow?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area and enter surface waters or drainage features that lead to surface waters?

Yes No Unknown NA

Is there any indication that a dosing cycle occurred during the inspection?

Yes No Unknown NA

Have there been any recent precipitation events that would serve to influence any of the observations made during this site visit?

SOP-05054 - Integrated Resource Management, Inc. - Sterling Springs S/D

Yes No Unknown NA

Date of precipitation event:

Amount of precipitation (in.):

Are drip dispersal lines exposed?

Yes No Unknown NA

Is this by design or otherwise?

Are there any indications of land application system damage?

Yes No Unknown NA

What is the estimated distance between the drip lines in feet?

0.5 1.0 1.5 2.0 2.5 3.0

3.5 4.0 4.5 5.0 5.5 6.0

7.0 7.5 8.0 8.5 9.0 9.5

10.0 10.5 Unknown NA

Other: _____

Is a follow-up site visit necessary?

Yes No Unknown NA

Notes:

Many areas in drip application fields have been cleared and tubing that was damaged has been fixed. Mr. Cox states that when the undergrowth dies back in the fall that more thorough investigations for damaged drip tubing will be conducted. Pictures attached represent IRM's current progress in fixing damaged drip tubing.

Photos (4):









SOP Drip Field Special Investigation:

Inspector: Eric Ball

Date: December 18, 2024

SOP Tracking Number & Site:

SOP-05054 - Integrated Resource Management, Inc. - Sterling Springs S/D

Was there a representative of the operating entity present during the site visit?

Yes No

Operating entity representative:

This system is serving: Cabins/Resort

Is there any evidence of effluent bypassing or discharging from the treatment unit or around the treatment unit?

Yes No Unknown NA

Approximate Drip Field Location: 35.84956, -83.608704

Specify the drip field if there is more than one associated with this permit:

Is the land application area well defined (i.e., fence, signs, upkeep)?

Yes No Unknown NA

Is the land application area(s) readily accessible to support walk-through?

Yes No Unknown NA

Is vegetation on the land application area:

Well maintained Moderately maintained

Overgrown Wooded or Forest

Other: _____

Is there evidence of hydraulically overloaded soil conditions within the land application area?

Yes No Unknown NA

Does this evidence include the presence of saturated soil conditions?

Yes No Unknown NA

Does the evidence include the presence of ponded effluent?

Yes No Unknown NA

Does the evidence include observations of long-term ponding?

Yes No Unknown NA

Were photos or videos of these observations collected?

Yes No Unknown NA

If ponded conditions are present, are they localized as may be expected with a broken pipe, damaged valve, or damaged pressure relief valve?

Yes No Unknown NA

If ponded conditions are present, are they over a larger area or dosing zone as may be expected with overloaded soil conditions?

Yes No Unknown NA

Are ponded conditions resulting in overland flow?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area and enter surface waters or drainage features that lead to surface waters?

Yes No Unknown NA

Is there any indication that a dosing cycle occurred during the inspection?

Yes No Unknown NA

Have there been any recent precipitation events that would serve to influence any of the observations made during this site visit?

Yes No Unknown NA

Date of precipitation event:

12/17/2024

Amount of precipitation (in.):

0.50

Are drip dispersal lines exposed?

Yes No Unknown NA

Is this by design or otherwise?

Otherwise exposed due to erosion

Are there any indications of land application system damage?

Yes No Unknown NA

What is the estimated distance between the drip lines in feet?

0.5 1.0 1.5 2.0 2.5 3.0
 3.5 4.0 4.5 5.0 5.5 6.0
 7.0 7.5 8.0 8.5 9.0 9.5
 10.0 10.5 Unknown NA
 Other: _____

Is a follow-up site visit necessary?

Yes No Unknown NA

Notes:

Drip field is installed across drainages and broken in several places.
Treatment unit and drip field is located at end of zip line right below 650 (mountain life)
Stockton Drive

Photos (17):



































SOP Drip Field Special Investigation:

Inspector: James West

Date: January 29, 2024

SOP Tracking Number & Site:

SOP-18012 - IRM - Waterside on Douglas Lake

Was there a representative of the operating entity present during the site visit?

Yes No

Operating entity representative:

This system is serving: Subdivision

Is there any evidence of effluent bypassing or discharging from the treatment unit or around the treatment unit?

Yes No Unknown NA

Approximate Drip Field Location: 36.011164, -83.291666

Specify the drip field if there is more than one associated with this permit:

Is the land application area well defined (i.e., fence, signs, upkeep)?

Yes No Unknown NA

Is the land application area(s) readily accessible to support walk-through?

Yes No Unknown NA

Is vegetation on the land application area:

Well maintained Moderately maintained
 Overgrown Wooded or Forest
 Other: _____

SOP-18012 - IRM - Waterside on Douglas Lake

Is there evidence of hydraulically overloaded soil conditions within the land application area?

Yes No Unknown NA

Does this evidence include the presence of saturated soil conditions?

Yes No Unknown NA

Does the evidence include the presence of ponded effluent?

Yes No Unknown NA

Does the evidence include observations of long-term ponding?

Yes No Unknown NA

Were photos or videos of these observations collected?

Yes No Unknown NA

If ponded conditions are present, are they localized as may be expected with a broken pipe, damaged valve, or damaged pressure relief valve?

Yes No Unknown NA

If ponded conditions are present, are they over a larger area or dosing zone as may be expected with overloaded soil conditions?

Yes No Unknown NA

Are ponded conditions resulting in overland flow?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area and enter surface waters or drainage features that lead to surface waters?

Yes No Unknown NA

Is there any indication that a dosing cycle occurred during the inspection?

SOP-18012 - IRM - Waterside on Douglas Lake

Yes No Unknown NA

Have there been any recent precipitation events that would serve to influence any of the observations made during this site visit?

Yes No Unknown NA

Date of precipitation event:

01/28/2024

Amount of precipitation (in.):

1.00

Are drip dispersal lines exposed?

Yes No Unknown NA

Is this by design or otherwise?

Are there any indications of land application system damage?

Yes No Unknown NA

What is the estimated distance between the drip lines in feet?

0.5 1.0 1.5 2.0 2.5 3.0

3.5 4.0 4.5 5.0 5.5 6.0

7.0 7.5 8.0 8.5 9.0 9.5

10.0 10.5 Unknown NA

Other: _____

Is a follow-up site visit necessary?

Yes No Unknown NA

Notes:

Needs signage and fencing.

Photos (2):





SOP Drip Field Special Investigation:

Inspector: William Luke

Date: February 02, 2024

SOP Tracking Number & Site:

SOP-03034 - IRM Utilities, Inc. - Spaulding Bed & Breakfast

Was there a representative of the operating entity present during the site visit?

Yes No

Operating entity representative:

This system is serving: Subdivision, Bed & Breakfast

Is there any evidence of effluent bypassing or discharging from the treatment unit or around the treatment unit?

Yes No Unknown NA

Approximate Drip Field Location: 35.98682, -83.721436

Specify the drip field if there is more than one associated with this permit:

Is the land application area well defined (i.e., fence, signs, upkeep)?

Yes No Unknown NA

Is the land application area(s) readily accessible to support walk-through?

Yes No Unknown NA

Is vegetation on the land application area:

Well maintained Moderately maintained

Overgrown Wooded or Forest

Other: _____

Is there evidence of hydraulically overloaded soil conditions within the land application area?

Yes No Unknown NA

Does this evidence include the presence of saturated soil conditions?

Yes No Unknown NA

Does the evidence include the presence of ponded effluent?

Yes No Unknown NA

Does the evidence include observations of long-term ponding?

Yes No Unknown NA

Were photos or videos of these observations collected?

Yes No Unknown NA

If ponded conditions are present, are they localized as may be expected with a broken pipe, damaged valve, or damaged pressure relief valve?

Yes No Unknown NA

If ponded conditions are present, are they over a larger area or dosing zone as may be expected with overloaded soil conditions?

Yes No Unknown NA

Are ponded conditions resulting in overland flow?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area?

Yes No Unknown NA

Does overland flow from the land application area or system leave the land application area and enter surface waters or drainage features that lead to surface waters?

Yes No Unknown NA

Is there any indication that a dosing cycle occurred during the inspection?

SOP-03034 - IRM Utilities, Inc. - Spaulding Bed & Breakfast

Yes No Unknown NA

Have there been any recent precipitation events that would serve to influence any of the observations made during this site visit?

Yes No Unknown NA

Date of precipitation event:

Amount of precipitation (in.):

Are drip dispersal lines exposed?

Yes No Unknown NA

Is this by design or otherwise?

Are there any indications of land application system damage?

Yes No Unknown NA

What is the estimated distance between the drip lines in feet?

0.5 1.0 1.5 2.0 2.5 3.0
 3.5 4.0 4.5 5.0 5.5 6.0
 7.0 7.5 8.0 8.5 9.0 9.5
 10.0 10.5 Unknown NA
 Other: _____

Is a follow-up site visit necessary?

Yes No Unknown NA

Notes:

Area serving the system, appears to be mostly vacant. No ponding was observed during the time of visitation.

Photos (3):









MEMORANDUM

DATE: 6/13/2024

TO: WaterLog File

FROM: Brad Antone, DWR-KEFO

SUBJECT: IRM Utility, Inc. – Emory Pointe Subdivision
SOP-04012
Missing Monthly Operations Reports

The Tennessee Department of Environment and Conservation, Division of Water Resources (DWR) does not have monthly operations reports (MOR's) for IRM Utility, Inc – Emory Pointe Subdivision, for the following reporting periods since June 2020:

- 2020: June through December
- 2021: January through December
- 2022: January through December
- 2023: January through December
- 2024: January through June

Personnel from DWR in the Knoxville Environmental Field Office are working with TDEC's Land Based unit in Nashville, as well as the subject system to obtain these MOR's. MOR's will be uploaded to the public data viewer as they are obtained by DWR.