



851 Aviation Parkway
Smyrna, TN 37167

November 2, 2015

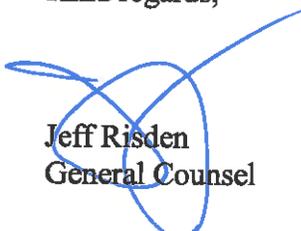
Mr. David Foster, Chief
Utilities Division
Tennessee Regulatory Authority
502 Deaderick Street, 4th Floor
Nashville, TN 37243

RE: Docket # 15-00025

Dear Mr. Foster,

Enclosed, please find an original and four (4) copies of the monthly report filed pursuant to the order in Docket 15-00025. Please let me know if you have any questions.

Kind regards,



Jeff Ridsen
General Counsel

Tennessee Wastewater Systems, Inc.
Docket 15-00025
November Report Overview

Systems subject to Notice of Violations and other Corrective Orders:

Tall Oaks (NOV) – repairs made; awaiting inspection by TDEC

Starr Crest I (NOV) – repairs made; awaiting inspection by TDEC

Starr Crest II (NOV) – repairs made; awaiting inspection by TDEC – issues with expanding the system are being addressed with the HOA. Preliminary plans are almost complete – conversations ongoing with TDEC regarding the plans. Soil mapping is currently under way.

Smoky Village (NOV) – repairs made; awaiting inspection by TDEC – also part of Docket 14-00136 and still awaiting TDEC’s reconsideration of the validity of TWSI’s plans to move forward with hearing on docket petition

Townsend Square (NOV) – repairs made; awaiting inspection by TDEC

Swan Harbor (NOV) – repairs made; awaiting inspection by TDEC

Summit View – part of the 14-00136 Docket – plans have been submitted to TDEC

Cedar Hill – part of the 14-00136 Docket – currently in the public comment phase

Maple Green (NOV) – NOV received on October 2, 2015. TWSI disputes all violations reported in the NOV as nothing claimed in the NOV is a violation of the SOP. Also part of the 14-00136 Docket - currently in the public comment phase

TRA Flow KPI Report for 10/31/2015

Tracy Nichols	Permitted	Expected	Actual	% of Expected	AvgFlow
Cedar Hill DCP	75000	18036	0	0.00	5157.9
Maple Green DCP	74000	38873	30000	0.77	21344.3

Jeramy Stewart	Permitted	Expected	Actual	% of Expected	AvgFlow
Starr Crest I RSF	8000	2275	3037	1.33	2663.5
Starr Crest II BC	28000	23450	21534	0.92	17756.8
Summit View RSF	8000	5775	4570	0.79	6696.6

Tony Smith	Permitted	Expected	Actual	% of Expected	AvgFlow
Tall Oaks RSF	45000	11900	10820	0.91	11225.0

Stone Hanson	Permitted	Expected	Actual	% of Expected	AvgFlow
Townsend Town Square RSF	3640	3640	3706	1.02	1888.7

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY: Smoky Village Subdivision SOP NO.: 09033
 PERMITTEE: Tennessee Wastewater Systems, Inc. MONTH/YEAR: Jul 2016
 CITY: Kodak COUNTY: Sevier

COMMENTS ABOUT OPERATION AND COMPLIANCE
 Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may effect effluent quality.

DATE	TIME OF SAMPLING	EFFLUENT						
		WASTEWATER FLOW (gpd)	AMMONIA as N mg/l	BOD (5) mg/l	CBOD (5) mg/l	E-COLI (colonies/100ml)	NITRATE as N mg/l	TSS (mg/l)
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2								
3								
4								
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24								
25								
26								
27								
28								
29								
30	1:40 PM	See Flows	0.394					
31								
TOTAL								

AVERAGE MONTHLY FLOWS (GPD)

MONTH	FLOW
July	4,893
August	4,863
September	4,912

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR J. M. G. J. DATE 10/9/2016

LICENSE NUMBER 15084 PHONE (615) 220-7200

ANALYSIS BY OUTSIDE LABORATORY Yes No LABORATORY USED Microbac

SIGNATURE OF PRINCIPAL [Signature] DATE 10/9/2016
 EXECUTIVE OFFICER

ACTUAL MAX VALUE	REPORT		ACTUAL AVG VALUE	REPORT	
	REPORT	46		REPORT	NA
4,912	0.394		NA	NA	NA

PERMIT FREQUENCY OF ANALYSIS	Daily	1/Quarter	1/Year
	PERMIT SAMPLE TYPE	Totalizer	Grab
NO. OF VIOLATIONS	NA	NA	

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

EFFLUENT

DATE	TIME OF SAMPLING	WASTEWATER FLOW (gpd)	AMMONIA as N mg/l	BOD (5) mg/l	CBOD (5) mg/l	E-COLI (colonies/100ml)	NITRATE as N mg/l	TSS (mg/l)
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22	10:10 AM	See Flows	47.8			>2420		
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31								
TOTAL								
ACTUAL AVG VALUE		NA	NA	NA		NA		
PERMIT MAX LIMIT		REPORT	REPORT	46		REPORT		
ACTUAL MAX VALUE		28,386	47.8			>2420		

FACILITY: Sharr Crest II Resorts SOP NO.: 01033
 PERMITTEE: Tennessee Wastewater Systems, Inc. MONTH/YEAR: Jul 2015
 CITY: Sevierville COUNTY: Sevier

COMMENTS ABOUT OPERATION AND COMPLIANCE

Please document important events such as discharges of untreated wastewater, down equipment or plant
 updates which may affect effluent quality.

August E. Coli = >2420
 September E. Coli = >2420

A barbed wire fence was installed around the drip field in March, 2015 and permit modification submitted.

AVERAGE MONTHLY FLOWS (GPD)

MONTH	FLOW
July	28,386
August	21,806
September	16,122

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR [Signature] DATE 10/9/2016

LICENSE NUMBER 15084 PHONE (615) 220-7200

ANALYSIS BY OUTSIDE LABORATORY Yes LABORATORY USED Macrobac

SIGNATURE OF PRINCIPAL [Signature] DATE 10/9/2016

EXECUTIVE OFFICER

PERMIT FREQUENCY OF ANALYSIS	Daily	1/Quarter	1/Year	1/Quarter
PERMIT SAMPLE TYPE	Totalizer	Grab	Grab	Grab
NO. OF VIOLATIONS	NA	NA		NA

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY: Sharr Crest Resort SOP NO.: 00016
 PERMITTEE: Tennessee Wastewater Systems, Inc. MONTH/YEAR: Jul 2015
 CITY: Pigeon Forge COUNTY: Seymour

COMMENTS ABOUT OPERATION AND COMPLIANCE

Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may effect effluent quality.

DATE	TIME OF SAMPLING	EFFLUENT						
		WASTEWATER FLOW (gpd)	AMMONIA as N mg/l	BOD (5) mg/l	CBOD (5) mg/l	E-COLI (coloniae/100ml)	NITRATE as N mg/l	TSS (mg/l)
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22	9:40 AM	See Flows	8.14			>2420		
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31								
TOTAL								
ACTUAL AVG VALUE		NA	NA	NA	NA	NA		
PERMIT MAX LIMIT		REPORT	REPORT	46		941		
ACTUAL MAX VALUE		4,898	6.14			>2420		
PERMIT FREQUENCY OF ANALYSIS		Daily	1/Quarter	1/Year		1/Quarter		
PERMIT SAMPLE TYPE		Totalizer	Grab	Grab		Grab		
NO. OF VIOLATIONS		NA	NA			1		

A barbed wire fence was installed around the drip field in September 2015 and a permit modification submitted.

AVERAGE MONTHLY FLOWS (GPD)

MONTH	FLOW
July	4,898
August	4,300
September	4,313

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR J.M. Kelly DATE 10/8/2015

LICENSE NUMBER 15084 PHONE (615) 220-7200

ANALYSIS BY OUTSIDE LABORATORY Yes LABORATORY USED Microbac
 SIGNATURE OF PRINCIPAL A.R.V.S. DATE 10/9/2015
 EXECUTIVE OFFICER

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY: Summit View Resort SOP NO.: 08035
 PERMITTEE: Tennessee Wastewater Systems, Inc. MONTH/YEAR: Jul 2016
 CITY: Sevierville COUNTY: Sevier

COMMENTS ABOUT OPERATION AND COMPLIANCE

Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may affect effluent quality.

DATE	TIME OF SAMPLING	EFFLUENT						
		WASTEWATER FLOW (gpd)	AMMONIA as N mg/l	BOD (5) mg/l	CBOD (5) mg/l	E-COLI (colonies/100ml)	NITRATE as N mg/l	TS (mg/l)
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22	8:00 AM	See Flows	4.98			730		
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30								
31								
TOTAL								
ACTUAL AVG VALUE		NA	NA	NA		NA		
PERMIT MAX LIMIT		REPORT	REPORT	45		341		
ACTUAL MAX VALUE		9,570	4.98			730		
PERMIT FREQUENCY OF ANALYSIS		Daily	1/Quarter	Year		1/Quarter		
PERMIT SAMPLE TYPE		Totalizer	Grab	Grab		Grab		
NO. OF VIOLATIONS		NA	NA			0		

AVERAGE MONTHLY FLOWS (GPD)

MONTH	FLOW
July	9,570
August	9,018
September	4,116

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR [Signature] DATE 10/9/2015

LICENSE NUMBER 16094 PHONE (815) 220-7200

ANALYSIS BY OUTSIDE LABORATORY Yes LABORATORY USED Microbac

SIGNATURE OF PRINCIPAL [Signature] DATE 10/9/2015

EXECUTIVE OFFICER

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY: Swan Harbour Subdivision SOP NO.: 96053
 PERMITEE: Tennessee Wastewater Systems, Inc. MONTH/YEAR: JUL 2015
 CITY: Herriman COUNTY: Roane

COMMENTS ABOUT OPERATION AND COMPLIANCE

Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may affect effluent quality.

DATE	TIME OF SAMPLING	EFFLUENT						
		WASTEWATER FLOW (gpd)	AMMONIA as N mg/l	BOD (5) mg/l	CBOD (5) mg/l	E-COLI (colonies/100ml)	NITRATE as N mg/l	TSS (mg/l)
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29	2-15 AM	See Flows	26.0					
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31								
TOTAL								

AVERAGE MONTHLY FLOWS (GPD)

MONTH	FLOW
July	1,350
August	1,350
September	1,350

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 135. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR [Signature] DATE 10/9/2015

LICENSE NUMBER 15084 PHONE (815) 220-7200

ANALYSIS BY OUTSIDE LABORATORY Yes LABORATORY USED Microbac

SIGNATURE OF PRINCIPAL [Signature] DATE 10/9/2015

EXECUTIVE OFFICER [Signature]

PERMIT MAX LIMIT	REPORT	REPORT	45
ACTUAL MAX VALUE	1,350	26.0	
PERMIT FREQUENCY OF ANALYSIS	Daily	1/Quarter	1/Year
PERMIT SAMPLE TYPE	Totalizer	Grab	Grab
NO. OF VIOLATIONS	NA	NA	

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY: Tall Oak Subdivision
 PERMITTEE: Tennessee Wastewater Systems, Inc.
 CITY: Maryville
 COUNTY: Blount
 SCF NO.: 99024
 MONTH/YEAR: Aug 2015

COMMENTS ABOUT OPERATION AND COMPLIANCE

Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may effect effluent quality.

DATE	TIME OF SAMPLING	EFFLUENT						
		WASTEWATER FLOW (gpd)	AMMONIA as N (mg/l)	BOD (5) (mg/l)	CBOD (5) (mg/l)	E-COLI (colonies/100ml)	NITRATE as N (mg/l)	TSS (mg/l)
1								
2								
3								
4								
5	9:20 AM	See Flows	0.394	ND				
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31								
TOTAL								
ACTUAL AVG VALUE		NA	NA	NA				

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR: *[Signature]* DATE: 10/9/2015

LICENSE NUMBER: 15084 PHONE: (815) 220-7200

ANALYSIS BY OUTSIDE LABORATORY: Yes LABORATORY USED: Microbas

SIGNATURE OF PRINCIPAL: *[Signature]* DATE: 10/9/2015

EXECUTIVE OFFICER: *[Signature]*

AVERAGE MONTHLY FLOWS (GPD)

MONTH	FLOW
July	10,165
August	11,832
September	11,105

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF WATER POLLUTION CONTROL
 MONTHLY OPERATION REPORT FOR STATE OPERATING PERMITS

FACILITY: Townsend Town Square SCF NO.: 89018
 PERMITTEE: Tennessee Wastewater Systems, Inc. MONTH/YEAR: Jul 2015
 CITY: Townsend COUNTY: DeWitt

DATE	TIME OF SAMPLING	EFFLUENT						
		WASTEWATER FLOW (gpd)	AMMONIA as N mg/l	BOD (5) mg/l	CBOD (5) mg/l	E-COLI (colonies/100ml)	NITRATE as N mg/l	TSS (mg/l)
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26								
27								
28								
29								
30	3:30 PM	See Flows	72.0					>2420
31								
TOTAL								

Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may effect effluent quality.

COMMENTS ABOUT OPERATION AND COMPLIANCE

A chain link fence was installed around the drip field in January 2015 and a permit modification has been applied for.

AVERAGE MONTHLY FLOWS (gpd)

MONTH	FLOW
July	1,878
August	1,438
September	1,586

ACTUAL AVG VALUE: NA NA NA NA NA NA
 PERMIT MAX LIMIT: REPORT REPORT 45 941
 ACTUAL MAX VALUE: 1,878 72.0 >2420

I certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR: [Signature] DATE: 10/9/2015
 LICENSE NUMBER: 15084 PHONE: (815) 220-7200

ANALYSIS BY OUTSIDE LABORATORY: Yes LABORATORY USED: Microbac
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER: [Signature] DATE: 10/9/2015

PERMIT FREQUENCY OF ANALYSIS	Daily	1/Quarter	1/Year	1/Quarter
PERMIT SAMPLE TYPE	Totalizer	Grab	Grab	Grab
NO. OF VIOLATIONS	NA	NA		1

FACILITY: Cedar Hill Treatment Facility
 PERMITEE: Tennessee Wastewater Systems, Inc.
 CITY: Cedar Hill
 MONTH/YEAR: Sept 2015
 COUNTY: Robertson

COMMENT'S ABOUT OPERATION AND COMPLIANCE

Please document important events such as discharges of untreated wastewater, down equipment or plant upsets which may affect effluent quality.

DATE	TIME OF SAMPLING	EFFLUENT						
		WASTEWATER FLOW (gpd)	AMMONIA as N mg/l	BOD (5) mg/l	CBOD (5) mg/l	E-COLI (colonies/100ml)	NITRATE as N mg/l	TSS (mg/l)
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31								
TOTAL		0						

certify that the submitted information is accurate and complete. I further certify that all sampling was performed in accordance with approved procedures and all analyses were performed in accordance with 40 CFR Part 136. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE OF OPERATOR *Brian Carter* DATE 10/2/2015

LICENSE NUMBER 3541 PHONE (615) 220-7200

ANALYSIS BY OUTSIDE LABORATORY No LABORATORY USED

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER *a.r. [Signature]* DATE 10/2/2015

AVERAGE MONTHLY FLOWs (gpd)	
MONTH	FLOW
July	No Discharge to Date
August	No Discharge to Date
September	No Discharge to Date

Jeff Risdien

From: Bob Pickney [bob.pickney@adenus.com]
Sent: Friday, October 23, 2015 12:39 PM
To: 'Roy Denney'; 'Jeff Risdien'; 'Charles Hyatt'
Subject: FW: Grant Dunn Soil info.

Bob Pickney

Adenus Group, LLC | 849 Aviation Pkwy, Smyrna, TN 37167
Direct: +1 615.220.7160 | Toll Free: +1 888.4.ADENUS Ext: 160 | Mobile:
615.604.4712 | Fax: 615.220.7207

NOTICE: This message is intended only for the addressee and may contain information that is privileged, confidential and/or attorney work product. If you are not the intended recipient, do not read, copy, retain or forward this message or any attachment. Please notify the sender immediately and delete all copies of the message and any attachments. Neither the transmission of this message or any attachment, nor any error in transmission, constitutes a waiver of any applicable legal privilege. To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties under the Internal Revenue Code.

-----Original Message-----

From: George Garden [mailto:George.Garden@tn.gov]
Sent: Friday, October 23, 2015 11:44 AM
To: Bob Pickney
Subject: RE: Grant Dunn Soil info.

I need to update David Foster on the status of Maple Green, Cedar Hill, Summit View and Smoky Village as soon as I can by agreement. TDEC and TRA are trying to close the time delays between what each of us know and when to make sure a lack of communication is not slowing the legitimate processes down. I will be sure to indicate again that the plans for Maple Green and Cedar Hill are only awaiting the SOP public notice. Both are scheduled to go on notice next week.

My turn: I need more definitive soil surveys and property data. I won't compromise my licensure by approving topo based on County aerial surveys, property lines based on digital tax maps and soil surveys without scales and at 1"=100' scales. As Bob Pickney has said before, "It's the soils, stupid!" (I think you said that) and it IS the soils....the soils on the property you own that make all the difference. The fields that we both agree have failed have been primarily because of overloading soils and having the lowest part of the drip lines in the topographical drainage features compounding the concentration of the water.

George C Garden, P.E. BCEE | Chief Engineer Division of Water Resources Wm R Snodgrass
Tennessee Tower, Floor 11
312 Rosa L. Parks Ave.
Nashville, TN 37243
p. 615-253-9934 c. 615-416-0164
george.garden@tn.gov

tn.gov/environment

-----Original Message-----

From: Bob Pickney [mailto:bob.pickney@adenus.com]
Sent: Thursday, October 22, 2015 8:33 PM
To: George Garden
Subject: RE: Grant Dunn Soil info.

George,

Can we get some sort of letter from TDEC saying the plans for Maplegreen and Cedar Hill are approved (or will be) in the near future after public notice or even better pending public notice - We are dead in the water at the TRA without something from TDEC - this is not a legal requirement, just the TRA unwilling to move forward without TDEC blessing the plans - We need the letter to schedule a prehearing conference so the hearing officer and consumer advocate can have some assurance of the relative final cost - this is convoluted, but we are still months away from a hearing before the TRA Board, and assuming it is approved - yet more months before the final financial piece is in place so we can actually begin construction - I want to push as hard as possible to get funding -- both of these site are emergencies that should have been completed long ago - As another rambling thought, probably the best outcome is to get you involved with communication David Foster (TRA) and the Consumer Advocate (Attorney General's office) to add confidence to this whole process - given the new paradigm we will be proposing as a financial model, your thoughtful input and experience would be valuable to TDEC and our decentralized industry.

Thanks,
Bob

-----Original Message-----

From: George Garden [mailto:George.Garden@tn.gov]
Sent: Thursday, October 22, 2015 4:40 PM
To: Bob Pickney
Subject: RE: Grant Dunn Soil info.

I have it now.

By the way, the two wetland projects will be on public notice next week.

George C Garden, P.E. BCEE | Chief Engineer Division of Water Resources Wm R Snodgrass
Tennessee Tower, Floor 11
312 Rosa L. Parks Ave.
Nashville, TN 37243
p. 615-253-9934 c. 615-416-0164
george.garden@tn.gov
tn.gov/environment

-----Original Message-----

From: Bob Pickney [mailto:bob.pickney@adenus.com]
Sent: Thursday, October 22, 2015 9:17 AM
To: George Garden
Cc: Robert Odette; Brad Harris
Subject: Grant Dunn Soil info.

George,

I spoke with Grant Dunn this morning, and he told me he left his soils map pit info on the previously approved soil map with Billy Roach earlier this week. As far as I know this is everything we needed to get to you - Thank you, Bob

Bob Pickney

Adenus Group, LLC | 849 Aviation Pkwy, Smyrna, TN 37167
Direct: +1 615.220.7160 | Toll Free: +1 888.4.ADENUS Ext: 160 | Mobile:
615.604.4712 | Fax: 615.220.7207

Jeff Ridsen

From: Charles Hyatt [charles.hyatt@adenus.com]
Sent: Tuesday, October 27, 2015 2:30 PM
To: 'Roy Denney'; Keith Townsend; 'Jeff Ridsen'; Bob Pickney
Subject: FW: SOP Signed draft permit
Attachments: SOP-05039_Draft_Cedar_Hill_Drip_Irrigation_Permit_2015.pdf; SOP-01028_Maple_Green_Modification Draft_Drip_Irrigation_Permit 2015.pdf; 151026-MMXV-020-PNOTICE.pdf

From: Hari Akunuri [mailto:Hari.Akunuri@tn.gov]
Sent: Tuesday, October 27, 2015 2:11 PM
To: Charles.Hyatt@adenus.com
Cc: Brad Harris <Brad.Harris@tn.gov>; Ann Morbitt <Ann.Morbitt@tn.gov>; Wade Murphy <Wade.Murphy@tn.gov>; George Garden <George.Garden@tn.gov>; Patsy Fulton <Patsy.Fulton@tn.gov>; Michelle Ramsey <Michelle.Ramsey@tn.gov>
Subject: SOP Signed draft permit

All,

The attachments are the Draft Permit and the Public Notice document. If you have trouble opening them, please let me know. We do not plan to send out paper copies unless you instruct us otherwise. If you have any corrections, comments or questions, please contact me.

Please consider saving a copy of this email for your records.



Hari Akunuri
TDEC/DWR
William R. Snodgrass Tennessee Towers
312 Rosa L. Park Avenue, 11th Floor
Nashville, TN 37243
Email: Hari.Akunuri@tn.gov
Office: (615)532-0650
Fax: (615)532-0683

We accept and encourage electronic document submittals.

From: Brad Harris
Sent: Tuesday, October 27, 2015 2:06 PM
To: Hari Akunuri
Subject:



Department of
**Environment &
Conservation**

Brad C Harris P.E.

Division of Water Resources / William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor / Nashville, Tennessee 37243
Direct (615) 532-5367 / Brad.Harris@tn.gov



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

October 27, 2015

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

Subject: **Draft of State Operating Permit No. SOP-05039
TN Wastewater Systems - Cedar Hill Treatment Facility
Cedar Hill, Robertson County, Tennessee**

Dear Mr. Hyatt:

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 Control Board.

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

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

Sincerely,

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

Enclosure

cc: Permit File
Nashville Environmental Field Office
Mr. Allen Rather, Environmental Specialist 5, TDEC Division of Water Resources, Allen.rather@tn.gov
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, michelle.ramsey@tn.gov
Mr. Brian Carter, Maintenance Manager, Adenus Operations LLC, brian.carter@adenus.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-05039

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

TN Wastewater Systems - Cedar Hill Treatment Facility
Cedar Hill, Robertson County, Tennessee

FOR THE OPERATION OF

Septic tanks, effluent collection system, constructed wetlands and fenced drip system located at latitude 36.571 and longitude -86.97883 in Robertson County, Tennessee to serve Cedar Hill Treatment System. The design capacity of the system is 0.06 MGD.

This permit is issued as a result of the application filed on September 8, 2015, in the office of the Tennessee Division of Water Resources. This permit is contingent on the submission and department approval of construction plans, specifications and other data in accordance with rules of the department. Updated plans and specifications must be approved before any further construction activity.

This permit shall become effective on:

This permit shall expire on:

Issuance date:

for Tisha Calabrese Benton
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>
Effluent Flow *	Totalizer			Daily
BOD ₅	Grab	45 mg/l	N/A	Once/Year
Ammonia as N	Grab	Report	N/A	Once /Quarter

* Report average daily flow for each calendar month.

The treatment system shall be monitored by the permittee as specified below for a period of five years:

<u>Parameter</u>	<u>Sample Type</u>	<u>Measurement Frequency</u>
Influent flow	Totalizer	Daily
Effluent flow	Totalizer	Daily
Water Purchases (GPD)*	N/A	Daily
CBOD ₅	Grab	1/Month
Total Nitrogen	Grab	1/Month
Total Suspended Solids	Grab	1/Month
<i>E. coli</i>	Grab	1/Momth
Water Level Cell 1 & 2		Weekly
pH and D.O. Cell 2	Continuous	See note
Rainfall	Continuous	Daily

Note: Hourly reading of cell 2 pH or DO for 48 hours once a quarter during a period without rainfall.

* water purchases from the school in Cedar Hill during the 9 months of full classes.

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

This permit allows the operation of a wastewater drip irrigation system. There shall be no discharge of wastewater to any surface stream or 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.

Instances of ponding or pooling within the drip dispersal area not associated with a recent rainfall event 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 ponding, and the date the corrective actions were made. Ponding resulting in the discharge of treated wastewater into the Waters of the State or to locations where it is likely to move to Waters of the State shall be considered a violation of your State Operating Permit.

All drip fields shall be fenced sufficiently to prevent or impede unauthorized entry as well as to protect the facility from vandalism. Fencing shall be a minimum of four feet in height. Fencing shall be constructed of durable materials. Gates shall be designed and constructed in a manner to prevent or impede unauthorized entry. All designs are subject to division approval. Fence shall be installed prior to beginning of operation.

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

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

- the condition of the treatment facility security controls (doors, fencing, gates, etc.),
- the condition of the drip area security controls (doors, fencing, gates, etc.),
- the condition of the site signage,
- the operational status of the mechanical parts of the treatment system (pumps, filters, telemetry equipment, etc.)
- the condition of the UV bulbs (if applicable)

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

B. MONITORING PROCEDURES

1. Representative Sampling

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

Effluent to drip irrigation plots.

2. Test Procedures

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

C. DEFINITIONS

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

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

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

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

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

D. REPORTING

1. Monitoring Results

Monitoring results shall be recorded monthly OR in accordance with the operating and maintenance inspection schedule in the permit administrative file record and submitted quarterly. The quarterly report shall detail the following:

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. Operation reports and any communication regarding compliance with the conditions of this permit must be sent to:

Division of Water Resources

Nashville Environmental Field Office
711 R.S. Gass Boulevard
Nashville, TN 37216

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

2. Additional Monitoring by Permittee

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

3. Falsifying Reports

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

4. Signatory Requirement

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

E. SCHEDULE OF COMPLIANCE

Full operational level shall be attained after the construction of the treatment system is complete and the treatment system is placed into operation.

PART II

A. GENERAL PROVISIONS

1. Duty to Reapply

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

2. Right of Entry

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

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

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

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

3. Availability of Reports

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

4. Proper Operation and Maintenance

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

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

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

The drip dispersal area shall not be used for vehicular traffic or vehicular parking. Dozers, trucks, tractors, and other heavy vehicles shall not be allowed to run over the drip dispersal area lines or other parts of the system.

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) 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 assistance center within 24 hours from the time the permittee becomes aware of the circumstances. (The environmental field office should be contacted for names and phone numbers of emergency response personnel.)

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

i. A description of the discharge and cause of noncompliance;

ii. The period of noncompliance, including exact dates and times or, if not corrected, the anticipated time the noncompliance is expected to continue; and

iii. The steps being taken to reduce, eliminate, and prevent recurrence of the non complying discharge.

b. Scheduled Reporting

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

3. Overflow

a. "**Overflow**" means the unintended discharge to land or waters of Tennessee of wastes from any portion of the collection, transmission, or treatment system other than through permitted outfalls.

b. Overflows are prohibited.

c. The permittee shall operate the collection system so as to avoid overflows. No new or additional flows shall be added upstream of any point in the collection system, which experiences chronic overflows (greater than 5 events per year) or would otherwise overload any portion of the system.

d. Unless there is specific enforcement action to the contrary, the permittee is relieved of this requirement after: 1) an authorized representative of the Commissioner of the Department of Environment and Conservation has approved an engineering report and construction plans and specifications prepared in accordance with accepted engineering practices for correction of the problem; 2) the correction work is underway; and 3) the cumulative, peak-design, flows potentially added from new connections and line extensions upstream of any chronic overflow point are less than or proportional to the amount of inflow and infiltration removal documented upstream of that point. The inflow and infiltration reduction must be measured by the permittee using practices that are customary in the environmental engineering field and reported in an attachment to a Monthly Operating Report submitted to the local TDEC Environmental Field Office on a quarterly basis. The data measurement period shall be sufficient to account for seasonal rainfall patterns and seasonal groundwater table elevations.

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

4. Upset

a. "**Upset**" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent

caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

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

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

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

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

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

5. Adverse Impact

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

6. Bypass

a. "**Bypass**" is the intentional diversion of wastewater away from any portion of a treatment facility. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which would cause them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

b. Bypasses are prohibited unless all of the following 3 conditions are met:

i. The bypass is unavoidable to prevent loss of life, personal injury, or severe property damage;

ii. There are no feasible alternatives to bypass, such as the construction and use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should

have been installed in the exercise of reasonable engineering judgment to prevent a bypass, which occurred during normal periods of equipment downtime or preventative maintenance;

iii. The permittee submits notice of an unanticipated bypass to the Division of Water Resources in the appropriate Environmental Field Office within 24 hours of becoming aware of the bypass (if this information is provided orally, a written submission must be provided within five days). When the need for the bypass is foreseeable, prior notification shall be submitted to the director, if possible, at least 10 days before the date of the bypass.

c. Bypasses not exceeding permit limitations are allowed **only** if the bypass is necessary for essential maintenance to assure efficient operation. All other bypasses are prohibited. Allowable bypasses not exceeding limitations are not subject to the reporting requirements of 6.b.iii, above.

7. Washout

a. For domestic wastewater plants only, a "washout" shall be defined as loss of Mixed Liquor Suspended Solids (MLSS) of 30.00% or more. This refers to the MLSS in the aeration basin(s) only. This does not include MLSS decrease due to solids wasting to the sludge disposal system. A washout can be caused by improper operation or from peak flows due to infiltration and inflow.

b. A washout is prohibited. If a washout occurs the permittee must report the incident to the Division of Water Resources in the appropriate Environmental Field Office within 24 hours by telephone. A written submission must be provided within five days. The washout must be noted on the discharge monitoring report. Each day of a washout is a separate violation.

D. LIABILITIES

1. Civil and Criminal Liability

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

2. Liability Under State Law

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

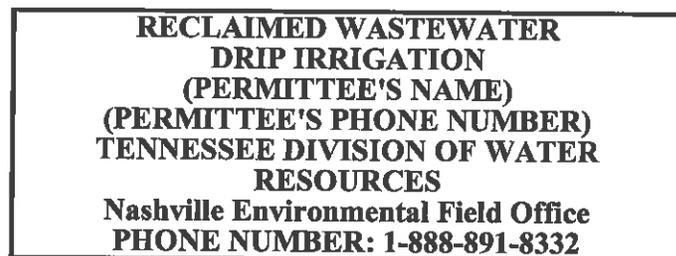
PART III OTHER REQUIREMENTS

A. CERTIFIED OPERATOR

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

B. PLACEMENT OF SIGNS

The permittee shall place a sign at the entrance if the drip area if fenced or all reasonable approaches to the drip irrigation lot. 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



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

C. ADDITION OF WASTE LOADS

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

D. SEPTIC TANK OPERATION

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

E. SEPTAGE MANAGEMENT PRACTICES

The permittee must comply with the provisions of Rule 0400-48-01-.22. If the septage is transported to another POTW for disposal, the permittee shall note the amount of septage wasted

in gallons and name of the facility the hauler intends to use for disposal of the septage on the monthly operation report. Sludge or any other material removed by any treatment works must be disposed of in a manner which prevents its entrance into or pollution of any surface or subsurface waters. Additionally, the disposal of such sludge or other material must be in compliance with the Tennessee Solid Waste Disposal Act, TCA 68-31-101 et seq. and Tennessee Hazardous Waste Management Act, TCA 68-46-101 et seq.

F. OWNERSHIP OF THE TREATMENT FACILITIES

a. The permittee shall own the treatment facilities (and the land upon which they are constructed) including the land to be utilized for drip or spray irrigation. A perpetual easement (properly recorded) may be accepted in lieu of ownership. If the permittee elects to make the treated wastewater available for reuse (irrigation of a golf course for example) a backup dedicated land application site must be provided or a perpetual easement must be obtained for the property where reuse is to take place. The perpetual easement must allow year-round application of the wastewater except where the permittee has provided (and the division has approved) storage facilities for periods when reuse is not available. 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 treatment system.

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

Rationale
Permit modification
TN Wastewater Systems – Cedar Hill Treatment Facility
SOP-05039
October 2015

The TN Wastewater Systems submitted an application for modification on September 3, 2015, to remedy a failed lagoon with an experimental constructed wetlands treatment system.

The division is granting your request and imposes the following monitoring requirements for a period of 5 five years or one complete permit cycle. This data is necessary for evaluation of the treatment ability of this experimental system for use in future permit considerations.

The limit table is expanded to include additional monitoring and reporting requirements for:

1. CBOD₅:
2. Total Nitrogen:
3. Total suspended solids:
4. *E.coli*:
5. Flow influent and effluent and school water purchase
6. Waterlevel from cell 1 and cell 2:
7. Hourly reading of cell 2 pH and D.O. once/quarter during a period without rain:
8. Daily rainfall totals:

Attachment 1
STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES-LAND BASED SYSTEMS UNIT
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, Tennessee 37243

MEMORANDUM

TO: Hari Akunuri, DWR-CO

FROM: Allen Rather, DWR- Land Based Systems Unit

DATE: 10/20/2015

SUBJECT: LCSS/SFDS (Class V Injection) Approval
Cedar Hill Treatment Facility
Cedar Hill, Robertson County, Tennessee
UIC File ROB 0000028 SOP-05039

The Division of Water Resources has reviewed the submittal of an Application for Authorization to Operate a Class V Underground Injection Well (Large Capacity Septic System/Subsurface Fluid Disposal System) utilizing drip dispersal for the waste water at the Cedar Hill Treatment Facility located at Cedar Hill, Robertson County, Tennessee. This Division approves the application dated 09/03/2015.

If at any time the Division learns that a ground water discharge system may be in violation of The Tennessee Water Quality Control Act, the Division shall:

- a. require the injector to apply for an individual permit;
- b. order the injector to take such actions including, where required, closure of the injection well as may be necessary to prevent the violation; or
- c. take enforcement action.

All groundwater discharge activities must operate in such a manner that they do not present a hazard to groundwater.

In accordance with Underground Injection Control (UIC) Rule 0400-45-06-.14 (3) "The owner of a Class V well shall be responsible for notifying the Department of change in ownership." This notification must be made to this Division within thirty (30) days of the change in ownership.

Also note that according to Underground Injection Control (UIC) Rule 0400-45-6-.14 (8)(d) "Upon completion of the well, the owner or operator must certify to the Department that the well has been completed in accordance with the approved construction plan, and must submit any other additional information required". The certification must be submitted to the UIC Program within thirty (30) days upon the completion/closure of the Class V well.

This Division will require a minimum of seven (7) working days advance notice before the construction on the drip system is to begin to allow for a witness from this Division to be present.

No drip emitters are to discharge directly into an open throat or crevice in the subsurface. All drip lines are to be installed on contour.

Our concurrence with your approach does not imply that this procedure is exempt from future changes or restrictions in the Underground Injection Control (UIC) Regulations, or any additional requirements set forth by the Division in order to protect the groundwater of Tennessee.

A copy of this authorization must be kept on site until the development has been completed and must be made available to inspection personnel.

Should you have any questions or comments please feel free to contact me at (615) 532-5819 or allen.rather@tn.gov.

c: file



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

October 27, 2015

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

Subject: **Draft of State Operating Permit No. SOP-01028**
TN Wastewater Systems - Maple Green Reclamation Facility
Coopertown, Robertson County, Tennessee

Dear Mr. Hyatt:

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 Control Board.

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

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

Sincerely,

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

Enclosure

cc: Permit File
Nashville Environmental Field Office
Mr. Allen Rather, Environmental Specialist 5, TDEC Division of Water Resources, Allen.rather@tn.gov
Mr. Brian Carter, Maintenance Manager, Adenus Operations LLC, brian.carter@adenus.com
Ms. Michelle Ramsey, Utilities Division, Tennessee Regulatory Authority, michelle.ramsey@tn.gov

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

Modification

Permit No. SOP-01028

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

TN Wastewater Systems - Maple Green Reclamation Facility
Coopertown, Robertson County, Tennessee

FOR THE OPERATION OF

Septic tanks, effluent collection system, from deep cell lagoon to constructed wet lands and drip irrigation system. The entire treatment and drip site is fenced. system located at latitude 36.44019 and longitude -86.99603 in Robertson County, Tennessee to serve the Maple Green Reclamation Facility. The design capacity of the system is .06 MGD.

This permit is issued as a result of the application filed on September 8, 2015, in the office of the Tennessee Division of Water Resources. This permit is contingent on the submission and department approval of construction plans, specifications and other data in accordance with rules of the department. Updated plans and specifications must be approved before any further construction activity.

This permit shall become effective on:

This permit shall expire on: June 30, 2018

Issuance date:

for Tisha Calabrese Benton
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>
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* Report average daily flow for each calendar month.

The treatment system shall be monitored by the permittee as specified below for a period of five years:

<u>Parameter</u>	<u>Sample Type</u>	<u>Measurement Frequency</u>
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CBOD ₅	Grab	1/Month
Total Nitrogen	Grab	1/Month
Total Suspended Solids	Grab	1/Month
<i>E. coli</i>	Grab	1/Momth
Water Level Cell 1 & 2		Weekly
pH and D.O. Cell 2	Continuous	See note
Rainfall	Continuous	Daily

Note: Hourly reading of cell 2 pH or DO for 48 hours once a quarter during a period without rainfall.

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

 This permit allows the operation of a wastewater drip irrigation system. There shall be no discharge of wastewater to any surface stream or 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.

Instances of ponding or pooling within the drip dispersal area not associated with a recent rainfall event 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 ponding, and the date the corrective actions were made. Ponding resulting in the discharge of treated wastewater into the Waters of the State or to locations where it is likely to move to Waters of the State shall be considered a violation of your State Operating Permit.

All drip fields shall be fenced sufficiently to prevent or impede unauthorized entry as well as to protect the facility from vandalism. Fencing shall be a minimum of four feet in height. Fencing shall be constructed of durable materials. Gates shall be designed and constructed in a manner to prevent or impede unauthorized entry. All designs are subject to division approval. Fence shall be installed prior to beginning of operation.

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

- the condition of the treatment facility security controls (doors, fencing, gates, etc.),
- the condition of the drip area security controls (doors, fencing, gates, etc.),
- the condition of the site signage,
- the operational status of the mechanical parts of the treatment system (pumps, filters, telemetry equipment, etc.)
- the condition of the UV bulbs (if applicable)

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

B. MONITORING PROCEDURES

1. Representative Sampling

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

Effluent to drip irrigation plots.

2. Test Procedures

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

C. DEFINITIONS

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

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

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

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

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

D. REPORTING

1. Monitoring Results

Monitoring results shall be recorded monthly OR in accordance with the operating and maintenance inspection schedule in the permit administrative file record and submitted quarterly. The quarterly report shall detail the following:

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. Operation reports and any communication regarding compliance with the conditions of this permit must be sent to:

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

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

2. Additional Monitoring by Permittee

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

3. Falsifying Reports

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

4. Signatory Requirement

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

E. SCHEDULE OF COMPLIANCE

Full operational level shall be attained after the construction of the treatment system is complete and the treatment system is placed into operation.

PART II

A. GENERAL PROVISIONS

1. Duty to Reapply

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

2. Right of Entry

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

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

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

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

3. Availability of Reports

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

4. Proper Operation and Maintenance

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

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

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

The drip dispersal area shall not be used for vehicular traffic or vehicular parking. Dozers, trucks, tractors, and other heavy vehicles shall not be allowed to run over the drip dispersal area lines or other parts of the system.

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) 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 assistance center within 24 hours from the time the permittee becomes aware of the circumstances. (The environmental field office should be contacted for names and phone numbers of emergency response personnel.)

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

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

b. Scheduled Reporting

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

3. Overflow

a. "**Overflow**" means the unintended discharge to land or waters of Tennessee of wastes from any portion of the collection, transmission, or treatment system other than through permitted outfalls.

b. Overflows are prohibited.

c. The permittee shall operate the collection system so as to avoid overflows. No new or additional flows shall be added upstream of any point in the collection system, which experiences chronic overflows (greater than 5 events per year) or would otherwise overload any portion of the system.

d. Unless there is specific enforcement action to the contrary, the permittee is relieved of this requirement after: 1) an authorized representative of the Commissioner of the Department of Environment and Conservation has approved an engineering report and construction plans and specifications prepared in accordance with accepted engineering practices for correction of the problem; 2) the correction work is underway; and 3) the cumulative, peak-design, flows potentially added from new connections and line extensions upstream of any chronic overflow point are less than or proportional to the amount of inflow and infiltration removal documented upstream of that point. The inflow and infiltration reduction must be measured by the permittee using practices that are customary in the environmental engineering field and reported in an attachment to a Monthly Operating Report submitted to the local TDEC Environmental Field Office on a quarterly basis. The data measurement period shall be sufficient to account for seasonal rainfall patterns and seasonal groundwater table elevations.

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

4. Upset

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

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

- i. An upset occurred and that the permittee can identify the cause(s) of the upset;
- ii. The permitted facility was at the time being operated in a prudent and workman-like manner and in compliance with proper operation and maintenance procedures;
- iii. The permittee submitted information required under "Reporting of Noncompliance" within 24-hours of becoming aware of the upset (if this information is provided orally, a written submission must be provided within five days); and
- iv. The permittee complied with any remedial measures required under "Adverse Impact."

5. Adverse Impact

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

6. Bypass

a. "**Bypass**" is the intentional diversion of wastewater away from any portion of a treatment facility. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which would cause them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

b. Bypasses are prohibited unless all of the following 3 conditions are met:

i. The bypass is unavoidable to prevent loss of life, personal injury, or severe property damage;

ii. There are no feasible alternatives to bypass, such as the construction and use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass, which occurred during normal periods of equipment downtime or preventative maintenance;

iii. The permittee submits notice of an unanticipated bypass to the Division of Water Resources in the appropriate Environmental Field Office within 24 hours of becoming aware of the bypass (if this information is provided orally, a written submission must be provided within five days). When the need for the bypass is foreseeable, prior notification shall be submitted to the director, if possible, at least 10 days before the date of the bypass.

c. Bypasses not exceeding permit limitations are allowed **only** if the bypass is necessary for essential maintenance to assure efficient operation. All other bypasses are prohibited. Allowable bypasses not exceeding limitations are not subject to the reporting requirements of 6.b.iii, above.

7. Washout

a. For domestic wastewater plants only, a "washout" shall be defined as loss of Mixed Liquor Suspended Solids (MLSS) of 30.00% or more. This refers to the MLSS in the aeration basin(s) only. This does not include MLSS decrease due to solids wasting to the sludge disposal system. A washout can be caused by improper operation or from peak flows due to infiltration and inflow.

b. A washout is prohibited. If a washout occurs the permittee must report the incident to the Division of Water Resources in the appropriate Environmental Field Office within 24 hours by telephone. A written submission must be provided within five days. The washout must be noted on the discharge monitoring report. Each day of a washout is a separate violation.

D. LIABILITIES

1. Civil and Criminal Liability

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

2. Liability Under State Law

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

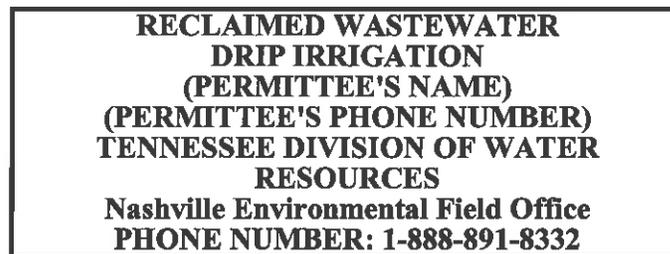
PART III OTHER REQUIREMENTS

A. CERTIFIED OPERATOR

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

B. PLACEMENT OF SIGNS

The permittee shall place a sign at the entrance if the drip area if fenced or all reasonable approaches to the drip irrigation lot. 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



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 TANK OPERATION

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

E. SEPTAGE MANAGEMENT PRACTICES

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

the Tennessee Solid Waste Disposal Act, TCA 68-31-101 et seq. and Tennessee Hazardous Waste Management Act, TCA 68-46-101 et seq.

F. OWNERSHIP OF THE TREATMENT FACILITIES

a. The permittee shall own the treatment facilities (and the land upon which they are constructed) including the land to be utilized for drip or spray irrigation. A perpetual easement (properly recorded) may be accepted in lieu of ownership. If the permittee elects to make the treated wastewater available for reuse (irrigation of a golf course for example) a backup dedicated land application site must be provided or a perpetual easement must be obtained for the property where reuse is to take place. The perpetual easement must allow year-round application of the wastewater except where the permittee has provided (and the division has approved) storage facilities for periods when reuse is not available. 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 treatment system.

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

Rationale
Permit modification
TN Wastewater Systems – Maple Green Reclamation Facility
SOP-01028
October 2015

The TN Wastewater Systems submitted an application for modification on September 3, 2015, to remedy a failed lagoon with an experimental constructed wetlands treatment system.

The division is granting your request and imposes the following monitoring requirements for a period of 5 five years or one complete permit cycle. This data is necessary for evaluation of the treatment ability of this experimental system for use in future permit considerations.

The limit table is expanded to include additional monitoring and reporting requirements for:

1. CBOD₅:
2. Total Nitrogen:
3. Total suspended solids:
4. *E.coli*:
5. Flow influent and effluent:
6. Waterlevel from cell 1 and cell 2:
7. Hourly reading of cell 2 pH or D.o. once/quarter during a period without rain:
8. Daily rainfall totals:

Attachment 1
STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES-WATER SUPPLY BRANCH
GROUND WATER MANAGEMENT SECTION
9th Floor, 401 Church Street
Nashville, Tennessee 37243-1549

MEMORANDUM

TO: Hari Akunuri, WPC-CO

FROM: Allen Rather, DWS- Ground Water Management Section

DATE: 10/21/2015

SUBJECT: LCSS/SFDS (Class V Injection) Approval
Maple Green Reclamation Facility
Coopertown, Robertson County, Tennessee
UIC File ROB 0000033 SOP-01028

The Division of Water Resources has reviewed the submittal of an Application for Authorization to Operate a Class V Underground Injection Well (Large Capacity Septic System/Subsurface Fluid Disposal System) utilizing conventional disposal for the waste water at the Maple Green Reclamation Facility located at Coopertown, Robertson County, Tennessee. This Division approves the application dated 9/08/2015.

If at any time the Division learns that a ground water discharge system may be in violation of The Tennessee Water Quality Control Act, the Division shall:

- a. require the injector to apply for an individual permit;
- b. order the injector to take such actions including, where required, closure of the injection well as may be necessary to prevent the violation; or
- c. take enforcement action.

All groundwater discharge activities must operate in such a manner that they do not present a hazard to groundwater.

Adenus shall also conduct a monthly visual inspection of the complete drip field looking for any signs of failure.

In accordance with Underground Injection Control (UIC) Rule 1200-4-6-.14 (3) "The owner of a Class V well shall be responsible for notifying the Department of change in ownership." This notification must be made to this Division within thirty (30) days of the change in ownership.

Also note that according to Underground Injection Control (UIC) Rule 1200-4-6-.14 (8)(d) "Upon completion of the well, the owner or operator must certify to the Department that the well has been completed in accordance with the approved construction plan, and must submit any other additional information required". The certification must be submitted to the UIC Program within thirty (30) days upon the completion/closure of the Class V well.

This Division will require a minimum of seven (7) working days advance notice before the construction on the drip system is to begin to allow for a witness from this Division to be present.

No drip emitters are to discharge directly into an open throat or crevice in the subsurface. All drip lines are to be installed on contour.

Our concurrence with your approach does not imply that this procedure is exempt from future changes or restrictions in the Underground Injection Control (UIC) Regulations, or any additional requirements set forth by the Division in order to protect the groundwater of Tennessee.

A copy of this authorization must be kept on site until the development has been completed and must be made available to inspection personnel.

Should you have any questions or comments please feel free to contact me at (615) 532-5819 or allen.rather@tn.gov.

c: file



Public Participation Opportunity
Tennessee Department of Environment and Conservation (TDEC)
Division of Water Resources (DWR)
Notice Requesting Public Comments on Draft Permit Actions

October 26, 2015

Public Notice Number: **MMXV-020**
 Expiration Date: **November 30, 2015**

The purpose of this notice is to advise the public of the following proposed permit actions and to solicit comments and information necessary to evaluate the potential impact of the proposed activities on human health and the environment. A list of Notices of Intent (NOIs) received by the DWR is available on our DataViewer web page :

http://tn.gov/environment/topic/ppo_water

Individual NPDES Permit for Concentrated Animal Feeding Operations

Proposed New Issuances

Applicant Name	Hickory Corner Dairy		
Permit Number	TN0081507	Permit Writer Initials	JCN
County	Claiborne	Discharger rating	Minor
		EFO Name	Knoxville
Street Address/Location	2160 Sharp Road		
City and/or Zip Code	Speedwell, TN 37870		
Description of Activity	800-head dairy cow operation with manure and process wastewater containment that may discharge from the production area only as the result of a rainfall event exceeding the 25 year, 24 hour rainfall amount		
Effluent Description			
Receiving Stream	Davis Creek		
Facility Latitude	36.51	Facility Longitude	-83.79

Individual NPDES Permits

Proposed Reissuances

Applicant Name	Caton's Chapel Elementary School		
Permit Number	TN0055689	Permit Writer Initials	HVA
County	Sevier	Discharger rating	Minor
		EFO Name	Knoxville
Street Address/Location	3135 Caton's Chapel Road		
City and/or Zip Code	Sevierville, TN 37876		
Description of Activity	Extended aeration		
Effluent Description	treated domestic wastewater from Outfall 001		
Receiving Stream	Bird Creek at mile 1.7		
Facility Latitude	35.80	Facility Longitude	-83.45

Applicant Name **Ford Nashville Property, Ford Motor Company**
 Permit Number **TN0080675** Permit Writer Initials **AEWF** Discharger rating **Minor**
 County **Davidson** EFO Name **Nashville**
 Street Address/Location **7228 Centennial Blvd**
 City and/or Zip Code **Nashville, TN 37209**
 Description of Activity **Non-operating unoccupied site - seeps and stormwater discharges from historic fills**
 Effluent Description **wastewater seeps from historic fill areas: discharges monitored via Outfalls 004 (with installed collection sump/pump station) and 006**
 Receiving Stream **Cumberland River - approximately from mile 181.2 to 181.9**
 Facility Latitude **36.19** Facility Longitude **-86.87**

Applicant Name **Tyson Foods, Inc.**
 Permit Number **TN0073563** Permit Writer Initials **PJH** Discharger rating **Minor**
 County **Obion** EFO Name **Jackson**
 Street Address/Location **2800 East Tyson Drive**
 City and/or Zip Code **Union City, TN 38261**
 Description of Activity **Treated effluent from Poultry Slaughtering and Processing**
 Effluent Description **treated process waterwater through Outfall 001**
 Receiving Stream **North Fork Obion River at mile 10.0**
 Facility Latitude **36.42** Facility Longitude **-89.01**

Proposed Terminations

Applicant Name **Eagleville High School**
 Permit Number **TN0057789** Permit Writer Initials **HVA** Discharger rating **Minor**
 County **Rutherford** EFO Name **Nashville**
 Street Address/Location **500 Highway 99**
 City and/or Zip Code **Eagleville, TN 37060**
 Description of Activity **Treatment system is now connected to the City of Eagleville WWTP SOP permit SOP-12022**
 Effluent Description **treated domestic wastewater from Outfall 001**
 Receiving Stream **Cheatham Branch at mile 1.9**
 Facility Latitude **35.74** Facility Longitude **-86.64**

Applicant Name **Lascassas Elementary School**
 Permit Number **TN0067245** Permit Writer Initials **HVA** Discharger rating **Minor**
 County **Rutherford** EFO Name **Nashville**
 Street Address/Location **6300 Lascassas Pike**
 City and/or Zip Code **Lascassas, TN 37085**
 Description of Activity **Septic tank, recirculating media filter with disposal of wastewater via drip irrigation and also direct discharge when needed. The county school system decided to terminate this permit. The drip irrigation activity is now covered under SOP-15019.**
 Effluent Description **treated domestic wastewater from Outfall 001 and drip irrigation**
 Receiving Stream **Bradley Creek at mile 2.7**
 Facility Latitude **35.93** Facility Longitude **-86.28**

Applicant Name **TVA - Watts Bar Fossil Plant (WBF)**
 Permit Number **TN0005461** Permit Writer Initials **JCM** Discharger rating **Minor**
 County **Rhea** EFO Name **Chattanooga**
 Street Address/Location **467 Steam Plant Road**
 City and/or Zip Code **Spring City, TN 37381**
 Description of Activity **TVA has completed deconstruction of the main power house in 2012, completed closure of all coal combustion facilities and transferred storm water discharges to TNR058427 in 2015. As a result, all discharges for Outfall 002 have been eliminated.**
 Effluent Description **combined process and non-process wastewater and storm water runoff from Outfall 002 and also to collect and pump untreated domestic wastewater to the Watts Bar Nuclear Plant Manhole No. 28**
 Receiving Stream **Tennessee River between river miles 528 and 530**
 Facility Latitude **35.61** Facility Longitude **-84.78**

State Operation Permits

Proposed Modifications

Applicant Name **TN Wastewater Systems - Maple Green Reclamation Facility**
 Permit Number **SOP-01028** Permit Writer Initials **HVA** Discharger rating **Minor**
 County **Robertson** EFO Name **Nashville**
 Street Address/Location **Sandy Springs Road**
 City and/or Zip Code **Coopertown, TN 37172**
 Description of Activity **This modification authorizes operation of septic tanks, effluent collection system, conversion from deep cell lagoon treatment to experimental constructed wetlands and a drip irrigation system. The entire treatment and drip site is fenced.**
 Wastewater Description **No discharge allowed**
 Receiving Stream **N/A**
 Facility Latitude **36.44** Facility Longitude **-87.00**

Proposed New Issuances

Applicant Name **Jones Company, LLC**
 Permit Number **SOP-15023** Permit Writer Initials **WDM** Discharger rating **Minor**
 County **Wilson** EFO Name **Nashville**
 Street Address/Location **Providence Parkway**
 City and/or Zip Code **Mt. Juliet, TN**
 Description of Activity **Temporary pump and haul system to serve up to 16 residential lots while the receiving public (Mt. Juliet) pump station and force main are being constructed on an adjacent property in partnership with that site's developer.**
 Wastewater Description **No discharge allowed**
 Receiving Stream **NA**
 Facility Latitude **36.16** Facility Longitude **-86.50**

Proposed Reissuances

Applicant Name	CUDRC - Chestnut Valley Suddivision (formally Matthews S/D East Jefferson Pike)		
Permit Number	SOP-05053	Permit Writer Initials	HVA
County	Rutherford	Discharger rating	Minor
Street Address/Location	Chestnut Valley Suddivision		
City and/or Zip Code	Murfreesboro, TN		
Description of Activity	Septic tanks, effluent collection system with recirculating sand filter and drip irrigation		
Wastewater Description	No discharge allowed		
Receiving Stream	N/A		
Facility Latitude	35.93	Facility Longitude	-86.30
Applicant Name	CUDRC - Forrest Ridge Subdivision Section III		
Permit Number	SOP-05066	Permit Writer Initials	HVA
County	Rutherford	Discharger rating	Minor
Street Address/Location	along Lila Drive in the Forrest Ridge Subdivision off of Rowland Road		
City and/or Zip Code	Murfreesboro, TN 37129		
Description of Activity	Septic tanks, effluent collection system, recirculating sand filter and drip irrigation system		
Wastewater Description	No discharge allowed from this system		
Receiving Stream	N/A		
Facility Latitude	35.77	Facility Longitude	-86.46
Applicant Name	CUDRC - Harrison Glen Subdivision		
Permit Number	SOP-00050	Permit Writer Initials	HVA
County	Rutherford	Discharger rating	Minor
Street Address/Location	Barfield Crescent Road		
City and/or Zip Code	Murfreesboro, TN 37133		
Description of Activity	Septic tanks, effluent collection system, recirculating sand filter and drip irrigation		
Wastewater Description	No discharge allowed		
Receiving Stream	N/A		
Facility Latitude	35.75	Facility Longitude	-86.44
Applicant Name	CUDRC - Thompson Grove Subdivision (formally Thompson Property Subdivision)		
Permit Number	SOP-05007	Permit Writer Initials	HVA
County	Rutherford	Discharger rating	Minor
Street Address/Location	Stratus Drive & Binder Lane		
City and/or Zip Code	Murfreesboro, TN 37129		
Description of Activity	Septic tanks, effluent collection system, recirculating sand filter, drip irrigation and fence around drip irrigation site		
Wastewater Description	No discharge allowed from this system		
Receiving Stream	N/A		
Facility Latitude	35.75	Facility Longitude	-86.32
Applicant Name	City of Millersville Collection System		
Permit Number	SOP-89150	Permit Writer Initials	JAH
County	Sumner	Discharger rating	Minor
Street Address/Location	1246 Louisville Highway		
City and/or Zip Code	Millersville, TN 37072		
Description of Activity	Collection system to Goodlettsville collection system to Nashville Dry Creek STP.		
Wastewater Description	No discharge allowed		
Receiving Stream	N/A		
Facility Latitude	36.38	Facility Longitude	-86.71

Applicant Name	Kelly's Chapel United Methodist Church		
Permit Number	SOP-00010	Permit Writer Initials	JAH Discharger rating Minor
County	Rutherford		EFO Name Nashville
Street Address/Location	301 E. Jefferson Pike		
City and/or Zip Code	Murfreesboro, TN 37130		
Description of Activity	Pump and haul of domestic wastewater		
Wastewater Description	No discharge allowed		
Receiving Stream	N/A		
Facility Latitude	35.95	Facility Longitude	-86.37
<hr/>			
Applicant Name	Rutherford County Board of Education - Lascassas Elementary School		
Permit Number	SOP-15019	Permit Writer Initials	HVA Discharger rating Minor
County	Rutherford		EFO Name Nashville
Street Address/Location	6300 Lascassas Pike		
City and/or Zip Code	Lascassas, TN 37085		
Description of Activity	Septic tank, effluent collection system and recirculating sand filter and fenced drip irrigation		
Wastewater Description	No direct discharge allowed		
Receiving Stream	N/A		
Facility Latitude	35.93	Facility Longitude	-86.28
<hr/>			
Applicant Name	TN Wastewater Systems - Cedar Hill Treatment Facility		
Permit Number	SOP-05039	Permit Writer Initials	HVA Discharger rating Minor
County	Robertson		EFO Name Nashville
Street Address/Location	4801 Jackson Road at Highway 41		
City and/or Zip Code	Cedar Hill, TN 37209		
Description of Activity	This reissuance authorizes the operation of septic tanks, effluent collection system, conversion of deep cell lagoon treatment to experimental constructed wetlands and drip irrigation disposal. The entire treatment and drip site is fenced.		
Wastewater Description	No discharge allowed from this system		
Receiving Stream	N/A		
Facility Latitude	36.57	Facility Longitude	-86.98
<hr/>			

POTW - Pretreatment Program Approvals:

None

The Division of Water Resources is authorized to approve local POTW Pretreatment Programs for the administration and enforcement of the National Pretreatment Standards of Performance for industrial users of the respective Publicly Owned Treatment Works listed in this notice. Additionally, the POTW Programs are required to prevent the introduction of pollutants into the POTW's which will interfere with their operation, including the use or disposal of sludge, and prevent the introduction of pollutants into the POTW's which will pass through the treatment works or be otherwise incompatible. All POTW Pretreatment Programs approved are in accordance with the Tennessee Water Quality Control Act, the federal Clean Water Act, and appropriate regulations.

End of List

How to Comment:

TDEC is requesting public comment on this permit action. Obtaining a broad range of facts and opinions on Agency actions is one of the best ways to ensure quality decisions. Persons wishing to comment on the proposed action are invited to submit comments in writing to the Division of Water Resources at William R. Snodgrass - Tennessee Tower, 312 Rosa L. Parks Avenue, 11th Floor, Nashville, Tennessee 37243-1102, Attn: Public Notice Coordinator, by fax number (615) 532-0686, or by E-mail at Water.Permits@tn.gov. Comments must be received by the public notice expiration date (November 30, 2015).

How to Request a Public Hearing:

Interested persons may request in writing that the Director of the Division of Water Resources hold a public hearing on any application. The request must be filed by the public notice expiration date (November 30, 2015) and must indicate the interest of the party filing it and the reasons why such a hearing is warranted. When there is significant public interest for a hearing, a hearing will be conducted according to Division of Water Pollution Control Rule 0400-40-05-.06(12). Public hearings will be announced through another public notice.

How the Department will Proceed:

The Director of the Division of Water Resources will determine the final permit action after considering comments submitted during the comment period, the hearing record, if any, and the requirements of the Federal and State acts and regulations.

To Obtain Permit Details:

Copies of the application(s) and draft permit(s) are also available for public inspection by contacting TDEC at <http://state.tn.us/environment/field-offices.shtml>, by calling 1-888-891-TDEC (8332), or by visiting the following locations during normal business hours:

Environmental Field Office - Chattanooga
1301 Riverfront Parkway, Suite 206
Chattanooga, TN 37402
(423) 634-5745
Bledsoe, Bradley, Grundy, Hamilton, Marion, McMinn, Meigs, Polk, Rhea, Sequatchie

Environmental Field Office - Columbia
1421 Hampshire Pike
Columbia, TN 38401
(931) 380-3371
Bedford, Coffee, Franklin, Giles, Hickman, Lawrence, Lewis, Lincoln, Marshall, Maury, Moore, Perry, Wayne

Environmental Field Office - Cookeville
1221 South Willow Avenue
Cookeville, TN 38506
(931) 432-4015

Cannon, Clay, Cumberland, Fentress, Jackson, Macon, Overton, Pickett, Putnam, Smith, Van Buren, Warren, White

Environmental Field Office - Jackson
1625 Hollywood Drive
Jackson, TN 38305
(731) 512-1300

Benton, Carroll, Chester, Crockett, Decatur, De Kalb, Dyer, Gibson, Hardeman, Hardin, Haywood, Henderson, Henry, Lake, Lauderdale, Madison, McNairy, Obion, Weakley

Environmental Field Office - Johnson City
2305 Silverdale Road
Johnson City, TN 37601
(423) 854-5400

Carter, Greene, Hancock, Hawkins, Johnson, Sullivan, Unicoi, Washington

Environmental Field Office - Knoxville
3711 Middlebrook Pike
Knoxville, TN 37921
(865) 594-6035

Anderson, Blount, Campbell, Claiborne, Cocke, Grainger, Hamblen, Jefferson, Knox, Loudon, Monroe, Morgan, Roane, Scott, Sevier, Union

Environmental Field Office - Memphis
8383 Wolf Lake Drive
Bartlett, TN 38133-4119
(901) 371-3000
Fayette, Shelby, Tipton

Environmental Field Office - Nashville
711 R.S. Gass Boulevard
Nashville, TN 37243
(615) 687-7000

Cheatham, Davidson, Dickson, Houston, Humphreys, Montgomery, Robertson, Rutherford, Stewart, Sumner, Trousdale, Williamson, Wilson

List of DWR Permit Writers

AEOF	Ms. Ariel Wessel-Fuss	(615) 532-0642	Ariel.Wessel-Fuss@tn.gov
BCH	Mr. Brad Harris	(615) 532-5367	Brad.Harris@tn.gov
BKC	Mr. Brian Canada	(615) 532-0660	Brian.Canada@tn.gov
CEE	Ms. Caitlin Elam	(615) 532-0359	Caitlin.Elam@tn.gov
HVA	Mr. Hari Akunuri	(615) 532-0650	Hari.Akunuri@tn.gov
JAH	Miss Julie Harse	(615) 532-0682	Julie.Harse@tn.gov
JCM	Mr. Jim McAdoo	(615) 532-0684	Jim.McAdoo@tn.gov
JCN	Mr. John Newberry	(615) 532-7743	John.Newberry@tn.gov
JWo	Ms. Jeanene Woodruff	(615) 532-0645	Jeanene.Woodruff@tn.gov
MEP	Ms. Meghan Ploch	(615) 532-0646	Meghan.Ploch@tn.gov
MTS	Ms. Maybelle T. Sparks	(615) 532-0651	Maybelle.Sparks@tn.gov
PJH	Mr. Paul Higgins	(615) 532-1178	Paul.Higgins@tn.gov
PLB	Mr. Lyle Bentley	(615) 532-0154	Lyle.Bentley@tn.gov
PMS	Mr. Phil Simmons	(615) 532-0358	Phil.Simmons@tn.gov
RDB	Mr. Robert D. Baker	(615) 532-0710	Robert.D.Baker@tn.gov
REA	Mr. Bob Alexander	(615) 532-0659	Robert.Alexander@tn.gov
RG0	Mr. Robert O'Dette	(615) 253-5319	Robert.Odette@tn.gov
RJW	Mr. Robert Wayne	(615) 532-0709	Robert.J.Wayne@tn.gov

SEF	Ms. Souraya Fathi	(615) 532-0485	Souraya.Fathi@tn.gov
VLJ	Ms. Vena Jones	(615) 253-5320	Vena.L.Jones@tn.gov
VMJ	Mr. Vojin Janjic	(615) 532-0670	Vojin.Janjic@tn.gov
WDM	Mr. Wade Murphy	(615) 532-0666	Wade.Murphy@tn.gov
WML	Mr. Mike Lee	(615) 532-0712	Mike.Lee@tn.gov

State of Tennessee Antidegradation Policy:

Antidegradation determinations have been made in regard to the permits referenced in this Public Notice. Tennessee's Antidegradation Statement is found in Chapter 0400-40-03-.06 of the Rules of the Tennessee Department of Environment and Conservation. The primary purpose of the antidegradation policy is to establish a greater level of protection for those waters that are identified to be of high quality. Generally, there are two types of high quality waters. Some high quality waters are those at near pristine conditions. These Outstanding National Resource Waters (ONRWs) are specifically designated by the Tennessee Board of Water Quality, Oil and Gas and are afforded the greatest level of protection. No new discharges or expansion of existing discharges are allowed to result in degradation of the existing water quality. Waters determined to be high quality due to specialized uses and/or unique features and are identified by the Department as Exceptional Tennessee Waters are also protected against degradation.

Some degradation may be allowed in the Exceptional Tennessee Waters only if the Tennessee Board of Water Quality, Oil and Gas deems it economically and socially necessary. Other surface waters not specifically identified and/or designated as high quality are referred to as waters with available or unavailable conditions. Generally, new discharges or increases in existing discharges may be allowed in waters not identified as ONRWs or Exceptional Tennessee Waters. The Division of Water Resource's evaluation of such discharges may include the following provisions:

- The proposed lowering of water quality by the discharge is necessary for economic growth or community benefit; the proposed discharge can not be mitigated by reasonable pollution prevention measures; and
- There is no other reasonable non-discharge alternative available to prevent the new/increased discharge to waters with available or unavailable conditions.

In all cases, the proposed discharge must meet water quality standards and fully protect all classified uses. Information used by the Division of Water Resources in evaluating any of the above provisions is available upon request.

State of Tennessee Policy of Non-Discrimination:

Pursuant to the State of Tennessee's policy of non-discrimination, the Tennessee Department of Environment and Conservation does not discriminate on the basis of race, sex, religion, color, national or ethnic origin, age, disability, or military service in its policies, or in the admission or access to, or treatment or employment in its programs, services or activities. Equal Employment Opportunity/Affirmative Action inquiries or complaints should be directed to the EEO/AA Coordinator, Office of General Counsel, William R. Snodgrass - Tennessee Tower, 312 Rosa L. Parks Avenue, 2nd Floor, Nashville, Tennessee 37243-1102, 1-888-867-7455. ADA inquiries or complaints should be directed to the ADA Coordinator, Human Resources Division, William R. Snodgrass - Tennessee Tower, 312 Rosa L. Parks Avenue, 2nd Floor, Nashville, Tennessee 37243-1102, 1-866-253-5827.

Please bring this notice to the attention of persons you believe will be interested.

**WASTEWATER COLLECTION SYSTEM OVERFLOW
OR TREATMENT UNIT BYPASS
REPORT FORM**

System Name:	SOP-00019, Starr Crest II Resorts	
County:	Sevier	
Date / Time Reported:	10/16/2015 at 4:45 p.m. via telephone calls to John West and Mike Caudill. Spoke to Mr. Caudill in person, left message for Mr. West.	
System Contact:	John Czahoroski	
Title:	Maintenance Manager, Tennessee Wastewater Systems, Inc.	
Phone Number:	John Czahoroski Cell: 865-809-8286	
Location, Cause, and Corrective Actions		
Location of Pump Station, Manhole, Other:	At the wastewater treatment plant discharge tank and control building.	
Date & Time Overflow / Bypass of Treatment Units Began:	Was called in by a grading contractor at the site at 12:30 p.m., 10/16/2015, who noticed water coming out of the control building door.	
Date & Time Overflow / Bypass Ended:	10/16/2015 3:30 p.m.	
Estimated Volume:	Less than 500 gallons	
Treatment Unit(s) Bypassed:	Discharge tank	
Cause of Overflow or Bypass:	Broken pipe at filter discharge inside control building	
Corrective Action or Repairs:	Repaired the broken pipe and pumped discharge tank down to normal level.	
Time & Date Completed, or Estimated:	10/16/2015 3:30 p.m.	
Volume Contained or Recovered:	All of the treated sewage coming out of the building and most of the water coming out of the discharge tank soaked into the ground around the shed and tank with 50 to 100 gallons flowing into the dry drainage ditch adjacent to the tank where it soaked in. Hydrated lime was applied to disinfect any wetted areas.	
Potential Impact		
Wastewater Entered Stream:	No, only a very small dry drainage ditch.	
Name of Stream:	NA	
Stream Conditions Observed:	NA	
Fish or Aquatic Life Killed:	None	
Distance of Impact:	NA	
Actions Taken to Minimize Health Hazards or Impact to Water Quality:	Spill was contained to a small dry drainage ditch, flow into ditch stopped within 10 feet. Hydrated lime was applied to all wetted areas for disinfection.	
Cleanup, Disinfection of Area:	Hydrated lime applied to all wetted areas for disinfection.	
Public Notified, Signs Posted, or Access Restricted:	No	
Stream Sampling Conducted:	NA	
Comments:	Broken pipe was promptly repaired, bypass was terminated and overflow was disinfected within 3 hours of notification.	
Reporter's Name, State Certification Number, and Date Report Prepared:	John Czahoroski, Certificate No. 15064 Prepared: 10/16/2015	



851 Aviation Parkway
Smyrna, TN 37167

October 15, 2015

Mr. Brad Harris
Tennessee Department of Environment and Conservation
Division of Water Resources
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243

Re: Notice of Violation – Townsend Town Square – SOP #99016

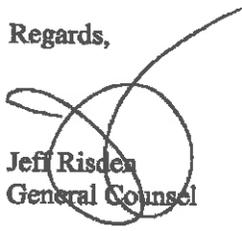
Mr. Harris:

This letter is in response to the Notice of Violation issued to Tennessee Wastewater Systems, inc. dated September 17, 2015 related to the Townsend Town Square Treatment Facility.

The NOV claims multiple violations of the SOP with regard to ponding and overflow into a road ditch that flows into a nearby stream. Since 2014 the drip field has been replaced including the addition of a discharge flush circuit, a fence has been installed and pumping, filtering, and flow control equipment have been upgraded. The drip field replacement and fence installation were noted on the second quarter MOR. As built plans do not have to be submitted to TDEC on a repair of the existing drip field. The drip field was installed in the drip field area as submitted and approved in the original plans.

The SOP states, "There shall be no discharge of wastewater to any surface stream or any location where it is likely to enter surface waters. There shall be no discharge of wastewater into any open throat sinkhole." The ponding observed on the July 20, 2015 site visit did not overflow to the road ditch. The prior issues with ponding and overflow have been remedied through the repairs listed above.

Regards,


Jeff Risdien
General Counsel



851 Aviation Parkway
Smyrna, TN 37167

October 15, 2015

Mr. Brad Harris
Tennessee Department of Environment and Conversation
Division of Water Resources
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243

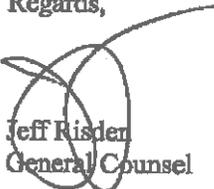
Re: Notice of Violation – Starr Crest I – SOP #00019

Mr. Harris:

This letter is in response to the Notice of Violation issued to Tennessee Wastewater Systems, Inc. ("TWSI") dated September 17th related to the Star Crest I Treatment Facility.

At the time of Mr. Alan Rather's unaccompanied visit to the facility, TWSI was in the midst of rehabbing the site. The drip field has since been re-installed and a fence built around the perimeter of the drip field. The drip field rehab and fence were noted on the 2015 first and second quarter MOR's. As built drawings are not required to be sent to TDEC as the modification was of the existing drip line within the original drip area of the approved plans.

Regards,



Jeff Risden
General Counsel



851 Aviation Parkway
Smyrna, TN 37167

October 15, 2015

Mr. Brad Harris
Tennessee Department of Environment and Conservation
Division of Water Resources
312 Rosa Parks Ave.
Nashville, TN 37243

RE: Notice of Violation – Swan Harbor SOP #98033

Mr. Harris,

This letter is in response to the Notice of Violation issued Tennessee Wastewater Systems, Inc. ("TWSI") on September 17, 2015 related to the Swan Harbor Treatment Facility.

The NOV claims TWSI is in violation of its SOP due to three instances of ponding observed during multiple site visits. The SOP states, "Instances of ponding or pools under dry weather conditions shall be promptly investigated and remedied." Ponding in and of itself is not a violation of the SOP. In two instances the depressions containing water were filled with storm water, not treated effluent. This is not a violation of the SOP and was not in need of remedy. The other instance was promptly fixed as required by the SOP and evidenced by John Czahorioski's letter dated August 19, 2015 attesting to the repair.

Lastly, since it was mentioned in the NOV, TWSI is unaware of any public health hazard or public/private nuisance created or caused by the operation of the drip irrigation system at Swan Harbor. If TDEC has any evidence to the contrary, I request that the evidence be provided to me for further evaluation by TWSI personnel.

Regards,



Jeff Risdien
General Counsel



851 Aviation Parkway
Smyrna, TN 37167

October 15, 2015

Mr. Brad Harris
Tennessee Division of Environment and Conservation
Division of Water Resources
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243

Re: Notice of Violation – Tall Oaks Treatment Facility – SOP #99024

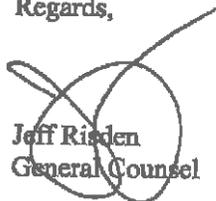
Mr. Harris:

This letter is in response to the Notice of Violation issued to Tennessee Wastewater Systems, Inc. (“TWSI”) dated September 17, 2015 related to the Tall Oaks Treatment Facility.

The NOV claims ponding was observed over multiple visits to the site. The SOP states “The operation (of the system) should be such that there is no contamination of and no wastewater discharge to any surface or subsurface stream because of the collected pools of water called “ponding”, irrigation into karst features or because of improper irrigation”. Ponding in and of itself is not a violation of the SOP. The ponding observed over the course of multiple visits were in different locations on the drip field. The ponding did not leave the drip field or discharge to any surface or subsurface stream; the ponding observed in these visits is not a violation of the SOP. Further, the cause of the ponding observed in the last visit was a result of a broken drip tube which was repaired as noted in John Czahorioski’s August 19, 2015 letter.

Since it is noted in the NOV, TWSI is unaware of any public health hazard or private nuisance created or caused by the operation of the Tall Oaks Treatment Facility. If TDEC has any evidence to the contrary, please forward it to me so TWSI may further evaluate the claims.

Regards,



Jeff Rinden
General Counsel



851 Aviation Parkway
Smyrna, TN 37167

October 15, 2015

Mr. Brad Harris
Tennessee Department of Environment and Conservation
Division of Water Resources
312 Rosa Parks Ave.
Nashville, TN 37243

RE: Notice of Violation – Starr Crest II SOP #01033

Mr. Harris,

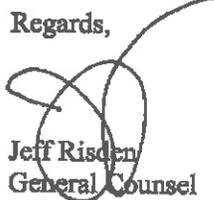
This letter is in response to the Notice of Violation issued Tennessee Wastewater Systems, Inc. ("TWSI") on September 17, 2015 related to the Starr Crest II Treatment Facility.

TWSI has been working diligently to improve the conditions at Starr Crest II as well as the performance of the existing wastewater system. The control system and drip filtration equipment have been upgraded to increase the performance to meet the increased demands of the development. Due to the increased flows from the proliferation of commercial cabin rentals in the development, TWSI is working to expand the system to meet the development's wastewater system needs. TWSI personnel have had discussions with George Garden regarding design flows and expanded treatment possibilities. Grant Dunn (soil scientist) and Billy Roach (TDEC) are working on the soils approval for an additional drip dispersal area. Preliminary design layout is complete with the proposed treatment and dispersal capacity increased to 60,000 gallons per day. Design plans will be completed once the soils are mapped by Mr. Dunn and approved by TDEC. The State Operating permit will need to be modified as well.

Once TWSI has TDEC approval on plans and permits, the TRA will need to approve funding for the construction. TWSI is working closely with the home owners' association in Starr Crest II to move this process along both from an engineering and financial standpoint. As with a few other sites as soon as TWSI has approval for all the agencies involved, it will be ready to begin the work to address the remaining issues at this facility.

As for the overflow issues noted by Alan Rather, TWSI disputes that the site suffers from chronic overflows and that water entered the stream – which is well over a thousand feet from the treatment plant. TWSI denies that there has been any violation of the SOP. If TDEC has any evidence showing the occurrence of these events in violation of the SOP, please forward the evidence to me so that TWSI may further evaluate.

Regards,



Jeff Risdien
General Counsel



851 Aviation Parkway
Smyrna, TN 37167

October 15, 2015

Mr. Brad Harris
Tennessee Department of Environment and Conservation
Division of Water Resources
312 Rosa Parks Ave.
Nashville, TN 37243

RE: Notice of Violation – Smoky Village SOP #05033

Mr. Harris:

This letter is in response to the Notice of Violation issued to Tennessee Wastewater Systems, Inc. ("TWSI") on September 17, 2015 related to the Smoky Village Treatment Facility.

TWSI believed it had valid construction plans up until early September when it was told TDEC considers the plans no longer valid. As of the date of this response, the status of the plans is still a matter of discussion between TWSI and TDEC. We are hopeful the matter will be resolved soon.

In addition to TDEC's approval of the construction plans, TWSI must receive TRA approval of the funds required to purchase the land for the new drip field and the construction of the improvements to the site. The TRA will not entertain TWSI's petition on the funding issue until TWSI has approved plans from TDEC. When TWSI has approval from both agencies on the matters before them, construction will begin as soon as reasonably possible on the improvements to the site.

Regarding the claims that ponding and overflow are violations of our State Operating Permit, the permit states that "Instances of ponding or pools under dry weather conditions shall be promptly investigated and remedied." TWSI has investigated the issue of ponding at the site and taken the appropriate action to deal with it as proposed in the engineered design plans. TWSI is unaware of any overflow leaving the site or entering the creek. If TDEC is in possession of such evidence, I ask that it be provided to me for further evaluation by TWSI personnel.

Ultimately the remedy for these issues is pending before TDEC and the TRA as noted above. When the plans and funding are approved, TWSI will be able to move forward and correct these issues. TWSI is committed to remedying the issues at Smoky Village. They have been trying to address the problems for almost two years; unfortunately TWSI has no control over TDEC or TRA matters, processes, timetables, or decisions. Once TDEC approves the plans and TRA approves the funding, TWSI will be ready to move forward.

Regards,


Jeff Riscden
General Counsel



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION
DIVISION OF WATER RESOURCES
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue
Nashville, TN 37243

October 2, 2015

CERTIFIED MAIL
7099 3220 0007 9323 2653
Return Receipt Requested

Mr. Charles Hyatt, CEO
Tennessee Wastewater Systems, Inc.
e-copy: charles.hyatt@adenus.com
849 Aviation Pkwy.
Smyrna, TN 37167

Re: **Notice of Violation**
Compliance Inspection
Tennessee Wastewater Systems, Inc.
Maple Green Treatment Facility
UIC# ROB 0000033 SOP-01028
Robertson County

Mr. Hyatt:

On 9/23/2015 Mr. Allen Rather conducted a Compliance Inspection of the Maple Green Treatment Facility. He met with Roy Denney with Adenus Group, LLC to review the operation of the system. The initial visit was to verify suitability of an additional soils area for drip dispersal.

The existing drip field was also inspected at that time. Several areas of ponding in the drip field were observed. Effluent was migrating towards an old pond that is dry due to a sinkhole collapse.

As stated in your permit, "This permit allows the operation of a wastewater drip irrigation system. There shall be no discharge of wastewater to any surface stream or 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."

Surface discharge to areas where it is likely to enter Waters of the State is a violation of your State Operation permit, and of the Water Quality Control Act. This letter will serve to formally notify you of the violations as identified on the above-listed date and by copy will inform our Enforcement Section of the violations. This NOV is not a legal action in itself, but such violations may lead to enforcement action. It is requested that a written response be submitted to this office within thirty (30) days of receipt of this letter, stating your proposed corrective action.