



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
JACKSON ENVIRONMENTAL FIELD OFFICE
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JACKSON, TENNESSEE 38305-4316
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July 1, 2020

Mr. Dart Kendall
e-copy: dart@aquagreenutility.com
Aqua Green Utility, Inc.
3350 Galts Road
Acworth, GA 30102

RE: Compliance Evaluation Inspection (CEI)
Aqua Green Utility, Inc. (McNairy Loves)
State Operating Permit SOP-16009
Henderson County

Dear Mr. Kendall:

On June 18, 2020 I performed a routine compliance evaluation inspection (CEI) at the above referenced facility in order to evaluate compliance with your State Operating Permit (SOP). Please see the sections below for details regarding the inspection.

I. Permit

The permit covers the treatment and subsurface disposal of wastewater from the Love's Travel Stop in Eastview, McNairy County, Tennessee. Effluent from the treatment system is disposed of using a three-zoned drip irrigation system located on site. The system capacity is rated at 0.006 MGD.

II. Records/Reports

A review of the facility's self-monitoring records was performed. Monitoring records were available upon request, consistently submitted to the local TDEC-DWR Environmental Field Office, accurately transcribed, complete and current. The lone exception being 1 missed BOD5 analysis caused by a receiving error at a contract laboratory.

III. Facility Site Review, Self-Compliance Program, Operations & Maintenance, and Sanitary Sewer Overflows

The plant process is described as a primary solids separator tank, fixed film trickle filter, sludge holding tank and fenced drip irrigation system. The treatment plant and drip irrigation system are both properly operated and maintained. The system is currently operated under the license of Dart Kendall, certification

level BNS. The plant has experienced no hydraulic or organic overloads since the development of a sufficiently thick biofilm on the reactor shortly after system startup.

IV. Flow Measurement

The effluent flow measurements are based on pump run times. Pump flows are periodically calibrated using a “timed run verses volume” method.

V. Laboratory

Self-monitoring samples are subcontracted to Pace Analytical. The subcontract laboratory was not evaluated as part of this inspection.

VI. Sludge Handling/Disposal (or Biosolids Handling/Disposal)

Septage is currently being pumped by Roger’s Septic Service (Savannah TN) on an as need basis. Septage is disposed on the Roger’s Septic approved land application site located on Hwy 203 in Savannah, TN.

VII. Additional Comments and Recommendations

Site inspections are currently being conducted by the operator at least every 14 days. Results of these inspections are document on the monthly operations report and submitted to the Jackson Environmental Field Office. Additionally, the plant is continuously monitored by a real-time internet-based telemetry system. Please be advised that changes to monitoring frequency may be approved by the division upon submittal of an operating and maintenance inspection schedule in accordance with the general requirements of the permit.

VIII. Conclusion

Compliance with the requirements of the SOP helps ensure there will be no unpermitted discharge of wastewater to any surface stream or other location where it is likely to enter surface waters. Thank you for your efforts to ensure permit compliance and protect state water quality. If I may be of assistance in matters concerning this report, please contact me via telephone at (731) 512.1312 or via email at bradley.e.smith@tn.gov.

Sincerely,



Bradley Smith
Environmental Consultant I
Division of Water Resources
Jackson Environmental Field Office

cc: Conner Franklin, DWR Program Coordinator, JEFO (via email)
Tammy Miller, DWR Jackson EFO (via email)
Anastasia Sharp, DWR Land-Based Systems Unit, Nashville (via email)