The State Design Criteria for Sewage Works, Chapters 15, 16, and 17 covering surface and subsurface land application of wastewater was revised effective July 29, 2007. The revisions to the design criteria were based upon research and recommendations from experts with a wide range of experience (academia, consulting, public sector, contractors, and regulatory). The requirements of Chapter 17 (Subsurface Drip Dispersal) with regard to the basis for design flow have not changed since July 29, 2007. The Division of Water Pollution Control (WPC) has been very consistent implementing the design criteria revisions in our State Operation Permits (SOPs).

Since July 29, 2007, WPC has required projects involving residential units to be designed on the basis of 300 gallons per day per unit (GPD/Unit). WPC acknowledges the fact that actual water use records for many residential developments show values lower than 300 GPD/Unit. Water use for the homes in Stonebridge has been very low (approximately 50 GPD/Unit) because there is no sewerage system yet and the residents are paying for pump-and-haul. However, this situation is expected to change dramatically once a sewerage system is completed, because the homes in Stonebridge are large residences as can be seen in the pictures in **Appendix 1**.

Across the state there is a very significant difference between "units". For example, compare Stonebridge's large homes with units served by Consolidated Utility District (CUD) in Rutherford County and units served by Tennessee Wastewater Systems, Inc. (TWSI) in middle and east Tennessee. Water use records for both CUD and TWSI show actual water use in the range of 150 to 200 GPD/Unit.

Appendix 2 shows a home in Royal Glenn Subdivision served by CUD. This is a typical home served by CUD. CUD uses 300 GPD/Unit as a design basis for all of their nearly 50 SOPs. Additionally, CUD requires a 50% reserve area on all SOP projects.

Appendix 3 shows a typical home served by TWSI in middle Tennessee and cabin in east Tennessee at Starr Crest 2. It is important to note that the basis for design of Starr Crest 2 was 300 GPD/Unit. Compare the Starr Crest 2 unit to the homes at Stonebridge.

For a comparative perspective, the Division of Ground Water Protection (GWP) uses 150 GPD/bedroom, makes corrections for slope, and requires a 100% duplicate area for the sewage disposal system (see Regulations to Govern Subsurface Sewage Chapter 1200-01-06). These GWP rules cover Advanced Treatment Systems (ATS) that are separate and distinct from the disposal field and are used to improve the quality of septic tank effluent to secondary levels. These ATS concept is essentially the same as used in decentralized systems regulated by WPC, and are configured with subsurface drip dispersal, but on a smaller scale.

The rationale for WPC's use of the 300 GPD/Unit is anchored in the fact that this is the only conservative factor used in our evaluation and permitting of these systems. WPC does not require a duplicate or reserve area, we do not adjust useable soil area based upon a correction for slope and we do not use 150 GPD/bedroom. Under GWP rules the new soil area at Stonebridge would only support 7 homes (see Britton Dotson's worksheet and calculation in **Appendix 4**).

While actual water use may average below 300 GPD/Unit, we know from experience that some developments have had overload problems on weekends, holidays and during vacation times. Furthermore, while decentralized systems are designed on the premise that the system is completely water tight, in actuality, there is some infiltration/inflow (I/I) in all systems. Therefore, we have empirical data that suggests using 300 GPD/Unit as the basis for design flow may not be enough. Nevertheless, the 300 GPD/Unit has been used consistently since July 29, 2007, and is believed to be a reasonable number on which to base the design flow for the Stonebridge project.

Appendix 5 are WaterLog records that show of 182 decentralized wastewater treatments systems with SOPs only 38 (see **Appendix 6**) of these have a design/permitted basis of less than 300 GPD/Unit.

Since our design criteria revisions of July 29, 2007, only 8 total systems have had a design/permitted basis of less than 300 GPD/Unit. Of these 8 only 2 systems were completely residential and each used 250 GPD/unit. These systems were:

- Saddle Ridge Community (SOP-07092). The reason for allowing the lower design flow per unit was based on several factors. The applicant TWSI had provided actual flow data for 5 other similar systems. The decision was also hinged on whether to permit this project at a loading rate of 0.25 GPD/SF and 300 GPD/Unit or at a lower loading rate and 250 GPD/unit. The latter option was selected.
- 2. The Peninsula (SOP-09022) with Aqua Green Utility. The reason for this was the transition from the old criteria to the new. This project was formerly Parrott's Bay (SOP-06017) with TWSI and was permitted under the old design criteria—no texture and structure, no pits. 2.7 acres was proposed to be used for 80 lots at 16,000 GPD (200 GPD/Unit) with a loading rate of ~0.14 GPD/SF. Permit limits were nitrate 20 mg/L and a very conservative U value of 50 pounds/acre was used—that is now 100 pounds/acre.

The Peninsula used 17,500 GPD—70 homes at 250 GPD/Unit on 1.62 acres which translates to a loading rate of 0.25 GPD/SF.

Keep in mind that a hydraulic loading rate of 0.25 GPD/SF is 2.81 inches per week and equivalent to over 146 inches of rainfall annually. Adding the natural rainfall, the equivalent loading rate approaches 200 inches of rainfall annually. The 0.25 GPD/SF loading rate produces rainfall equivalent to those in a tropical rain forest.

It is important to note that Stonebridge has requested, (per Engineering Report dated November 8, 2011 by Bob Faulhaber) both the higher loading rate (0.24 GPD/SF) and a reduced design flow of 245 GPD/unit. No system has ever been given both benefits in a variance. As you can see there are apples and oranges comparisons being made by Stonebridge to try to get us to make a major variance to our design criteria.

SUMMARY

- 1. Since July 29, 2007, WPC has been consistent in applying the criteria of 300 GPD/Unit as the basis for design flow for decentralized systems for almost 200 SOPs.
- 2. Comparing Stonebridge to CUD and TWSI projects makes it valid to use at least 300 GPD/Unit, because that is what has been used consistently with CUD and TWSI. Furthermore, the sizes of the units/homes at Stonebridge are significantly larger than those typically found at CUD and TWSI projects.
- 3. Reducing the basis for design flow for decentralized systems to a value less than 300 GPD/Unit would eliminate whatever factor of safety that may exist. Under GWP rules similar systems would require at least 3 times the soil area required by WPC.

RECOMMENDATION

Deny the variance request from Stonebridge to reduce the basis for design flow to 245 GPD/Unit. WPC should remain consistent, and preserve what little factor of safety exists using the 300 GPD/Unit.



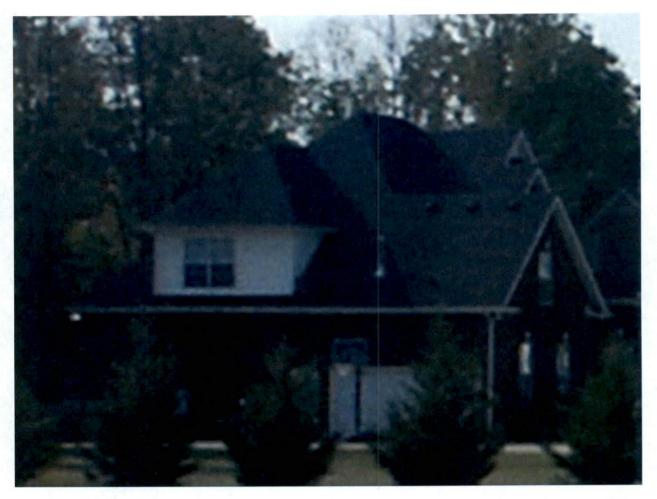
Home at Stonebridge, Jefferson County, TN



Home at Stonebridge, Jefferson County, TN



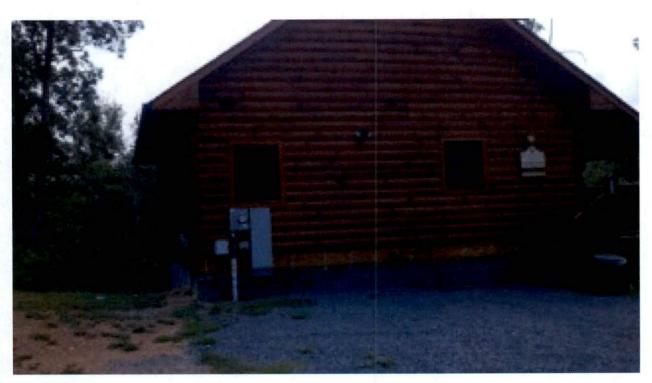
Home at Stonebridge, Jefferson County, TN



Home at Royal Glenn – Consolidated Utility District, Rutherford County, TN



Typical home served by Tennessee Wastewater Systems, Inc. (TWSI)
Wilson County, TN



Cabin unit served by Tennessee Wastewater Systems, Inc. (TWSI)
Starr Crest 2, Sevier County, TN

Stonebridge - Basis for Design Flow

450 gols | dong 7.13 3-6cdros 25 cet has a cottook (downslops) 214'9 = 006 -3. Bulloom System Total Equal Footogo 2 st 076'86 = 1 bedroom = 150 gols/day Jal 1 day L17'9 724E = poplety 1 1-p 5.00 LZH'E 901 100mg ZLH 'Z 815 29 -27/11 20-10 att cbste : 1.0 258 540 30.40% 3500 7.0 Z17'9 -751 551 007L 8. 12,358 pt 2002 gal Hit day 00bs 001 = 1 04-08 % - of 24/6 -7. 08.020 5,80 pt = 30.1 gal/pt = 1 day = 518 gal/day = 4. 05811 = % 9E FO7 2/052 = 3/36 3°11 1200 08-05 0 1102 /2011 Roe'd from Botson

006 = 05h/osh

EFO	7 11/29/11)		Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
Chattanooga	Bradley	BP Kangaroo Express Store #3628	SOP-02015	0.0008	800	1	800
Chattanooga	Bradley	Ocoee Utility District - Brighton Ridge & Woodbridge Subdivisions Johnston Estates	SOP-07034	0.02184	21840	80	273
Chattanooga	Bradley	Sewage Treatment & Collection System	SOP-09008	0.045	45000	150	300
Chattanooga	Meigs	Watts Bar Utility District - Espalier Bay Subdivision	SOP-06032	-			
Chattanooga	Meigs	Lake Park Place View Condominiums	SOP-07018	0.0024	2400	8	300
Chattanooga	Rhea	Tennessee Wastewater Systems, Inc Piney Bay Subdivision	SOP-06053	0.004	4000	14	286
Chattanooga	Rhea	Tennessee Wastewater Systems, Inc Blue Sky Bay Subdivision	SOP-07007	0.03	30000	100	300
Chattanooga	Rhea	Lake Front Estates Subdivision	SOP-07012	0.021	21000	70	300
Columbia	Bedford	Tennessee Wastewater Systems, IncHorseshoe Bend Condominiums Community High	SOP-01048	0.007	7000	26	269
Columbia	Bedford	School Treatment Facility	SOP-08010	0.015	15000	1	15000
Columbia	Coffee	Highway 53 Elementary School	SOP-09002	0.007	7000	1	7000
Columbia	Franklin	Tennessee Wastewater Systems, IncRoark Cove Treatment Facility	SOP-07082	0.0258	25800	86	300
Columbia	Franklin	Awalt Road Treatment Facility	SOP-08015	0.0309	30900	94	329
Columbia	Giles	Tennessee Wastewater Systems, Inc Milky Way Treatment Facility Marshall County Board	SOP-08011	0.0309	30900	100	309
Columbia	Marshall	of Public Utilities - The Villa at Chapel Hill	SOP-06042	0.0222	22200	74	300
Columbia	Marshall	Marshall County Board of Public Utilities -	SOP-07069	0.0579	57900	193	300

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Warner's Ridge					
Columbia	Maury	Mount Pleasant STP	SOP-04021	0.94	940000	_	
Columbia	Wadiy	Tennessee Wastewater Systems, IncOakwood	001 04021	0.01	010000		
Columbia				0.0145	14500	48	302
Cookeville	Clay	City of Celina - Swan Ridge Development	SOP-05061	-			
Cookeville	Clay	Mitchell Creek Marina, LLC	SOP-08004	0.03	30000	342	88
Cookeville	Cumberland	Crab Orchard Utility District - Obed River Estates	SOP-06027	0.0409	40900	117	350
Cookeville	Cumberland	South Cumberland Utility District - Mountain Vista Estates Subdivision	SOP-07033	0.0465	46500	155	300
Cookeville	Cumberland	Genesis Village Estates	SOP-08040	0.03	30000	100	300
Cookeville	Cumberland	Cumberland Mountain Preserve Subdivision	SOP-08049	0.0138	13800	46	300
Cookeville	Cumberland	Four Seasons Townhomes Association (Formerly D & R Properties, LLC)	SOP-90182	0.0035	3500	14	250
Cookeville	Cumberland	Deer Creek Homeowner's Association	SOP-91004	0.01	10000	11	909
Cookeville	DeKalb	Seventh Day Adventist Church - Indian Creek Camp	SOP-06003	-			
Cookeville	Fentress	Clarkrange Treatment Facility	SOP-07059	0.0426	42600	142	300
Cookeville	Fentress	Big South Fork Resort formerly Mountain View Golf Course & Lodge LLC.	SOP-08027	0.047	47000	120	392
Cookeville	Jackson	Scheley's Wild Acres	SOP-06043	0.0077	7700	28	275
Cookeville	Jackson	Cumberland Estates	SOP-07044	0.0198	19800	72	275
Cookeville	Livingston Municipal		TNR170440	_		-	
Cookeville	The Bluffs at Cumberland Cove lle Putnam Subdivision		SOP-07008	0.04375	43750	175	250
Cookeville	Smith	TDOT I-40 Welcome Center - Smith County	SOP-02045	0.017	17000	1	17000
Cookeville	Warren	Dibrell School STP	TP SOP-10039 0.01095 10950				10950
Jackson	Benton	TDOT - I-40 Rest Area-	SOP-97014	0.006	6000	1	6000

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Westbound					
Jackson	Decatur	IRM Utility, Inc - Riverstone Estates Wastewater Treatment Plant	SOP-09005	0.0483	48300	_	
Jackson	Decatul	Aqua Utilities	301-03003	0.0400			
Jackson	Hardin	Company, Inc.	SOP-92082	0.01481	14810	49	302
Jackson	Henderson	Pin Oak School	SOP-09015	0.01	10000	1_	10000
Jackson	Henderson	Scotts Hill School	SOP-09016	0.0095	9500	1	9500
Jackson	Henderson	South Haven Elementary School	SOP-09017	0.0115	11500	1	11500
Jackson	Henderson	Westover Elementary School	SOP-09018	0.013	13000	1	13000
Johnson City	Greene	Timberfell Lodge, LLC	SOP-07037	0.01	10000	10	1000
Johnson City	Hawkins	Clinch School	SOP-08064	0.008	8000	1	8000
Knoxville	Blount	Tennessee Wastewater Systems, Inc Trillium Cove Development	SOP-04065	0.01	10000	10	1000
Knoxville	Blount	Tennessee Wastwater Systems, Inc Griffitts Mill Subdivision	SOP-06033	0.06	60000	300	200
Knoxville	Blount	South Blount County Utilities District - The Reserve at Tuckaleechee Cove	SOP-06046	0.0198	19800	66	300
Knoxville	Blount	Blackberry Farm, LLC	SOP-07002	0.009	9000	1	9000
Knoxville	Blount	Tennessee Wastewater Systems, Inc The Reserve on the Tennessee River	SOP-07003	0.041	41000	164	250
Knoxville	Blount	Ashley Meadows Subdivision	SOP-07006	0.006	6000	22	273
Knoxville	Blount	Sharondel Estates	SOP-07010	0.01342	13420	61	220
Knoxville	Blount	Miss Lily's Cafe & Lodge	SOP-07078	0.00465	4650	1	4650
Knoxville	Blount	South Blount County Utility District - Farmington Subdivision	SOP-07079	0.0423	42300	141	300
Knoxville	Blount	TWS-Fairway Vistas Subdivision	SOP-08014	0.0057	5700	19	300
Knoxville	Blount	South Blount County Utility District	SOP-08022 0.0004		400	2	200
Knoxville	Blount	South Blount County U.DThe Terraces At Blount Ridge	SOP-08026	41	300		
Knoxville	Blount	Seymour Air Park Subdivision	SOP-08041	0.0078	7800	26	300

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Integrated Resource					
		Management, Inc	000 00000	0.000	6000	23	261
Knoxville	Campbell	Flat Hollow Subdivision Caryville Jacksboro	SOP-06039	0.006	6000	23	201
		Utilities Commission -					
Knoxville	Campbell	The Peninsula	SOP-06059	0.00665	6650	19	350
		Tennessee					
		Wastewater Systems,				,	
		Inc Villages at Norris		0.40	400000	000	200
Knoxville	Campbell	Lake	SOP-07001	0.18	180000	600	300
Knoxville	Campbell	Deer Hill Village	SOP-07052	0.0408	40800	96	425
Knoxville	Campbell	DSH & Associates formerly LaFollette Utilities Board - Lakeside Estates WWTP	SOP-07073	0.123	123000	410	300
Vill-	Camaball	Flat Hollow	SOP-08043	0.0072	7200	24	300
Knoxville	Campbell	Condominiums	30P-06043	0.0072	7200	24	300
Kana dila	Claibarna	Buddy Daniels R.V.	SOP-00067	0.01	10000	50	200
Knoxville	Claiborne	Park - Chapel Landing Maranatha Resort	30P-00007	0.01	10000	30	200
Knoxville	Cocke	Subdivision	SOP-08036	0.01	10000	33	303
Knoxville	Grainger	Integrated Resource Management, Inc The Landing at River's Edge Subdivision	SOP-07056	0.02793	27930	93	300
IZ	Hambles	The Preserve at Eagle	COD 00000	0.0227	32700	109	300
Knoxville	Hamblen	Rock	SOP-08006	0.0327			
Knoxville	Jefferson	The Peninsula	SOP-06017	0.016	16000	80	200
Knoxville	Jefferson	Tennessee Wastewater Systems, Inc Shady Cove	SOP-06022	0.00175	1750	7	250
Knoxville	Jefferson	Hickory Landing Development WWTP	SOP-07009	0.012	12000	40	300
		East sevier County Utility District -					
Knoxville	Jefferson	Bouldercrest Villas	SOP-07032	0.0084	8400	28	300
7.1.07.1.110		TWS-Paradise Acres					
Knoxville	Jefferson	Subdivision	SOP-08024	0.0273	27300	91	300
Knoxville	Jefferson	The Peninsula	SOP-09022	0.0175	17500	70	250
East Sevier County Utility District - Douglas Lake Wastewater Treatment Plant		SOP-09041	0.035	35000	128	273	
Knoxville	Tennessee Wastewater Systems, IncBrowning Knoxville Knox Subdivision		SOP-01024	0.0012	1200	4	300
V	Manage	Saddle Ridge	COD 07000	0.40405	101050	405	250
Knoxville	Monroe	Community	SOP-07092	0.12125	121250	485	25

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Monroe County					
		Schools-Rural Vale	000 0000		0000		0000
Knoxville	Monroe	School	SOP-08005	0.008	8000	1	8000
Knoxville	Monroe	Lakeside Meadows	SOP-08048	0.03	30000	100	300
Knoxville	Monroe	Scenic River	SOP-08056	0.003	3000	10	300
KIIOXVIIIE	e Monroe Development Sunbright Municipal		301-00030	0.003	3000	10	300
Knoxville	Morgan	WWTP	SOP-08063	0.02	20000	70	286
		Watts Bar Utility District					
Knoxville	Roane	- Highland Reserve	SOP-07036	0.0303	30300	101	300
		Camelot Care Center,					
Knoxville	Roane	Inc.	SOP-07054	0.00015	150	1	150
Knoxville	Doone	Trieana at Watts Bar	SOP-08025	0.024	24000	80	300
	Roane	Lake					
Knoxville	Sevier	Hidden Springs Resort Tennessee	SOP-00068	0.03075	30750	145	212
		Wastewater Systems,					
		Inc Starr Crest II					
Knoxville	Sevier	Resorts	SOP-01033	0.069	69000	230	300
		Tennessee					
		Wastewater Systems,			0500		404
Knoxville	Sevier	Inc Falling Waters	SOP-02023	0.0065	6500	14	464
		Tennessee Wastewater Systems,					
	_	Inc Black Bear Ridge					
Knoxville	Sevier	Resort	SOP-03002	0.03	30000	150	200
		Tennessee					
	1	Wastewater Systems,					
	0	Inc Keene's Island	000 05070	0.0045	4500	0	250
Knoxville	Sevier	Condominiums	SOP-05076	0.0015	1500	6	250
		Tennessee Wastewater Systems,					
		Inc Black Bear Ridge				-	
Knoxville	Sevier	Resort #2	SOP-05077	0.014	14000	70	200
		Tennessee					
		Wastewater Systems,					
Vnovaille	Covier	Inc Legacy Mountain	SOP-06002	0.04	40000	160	250
Knoxville	Sevier	North East Sevier County	SOP-06002	0.04	40000	160	250
		Utility District - Little					
Knoxville	Sevier	Cove Commons	SOP-06005	-			
		Tennessee					
		Wastewater Systems,					
Knowilla	Covier	Inc Summit View	SOB 0603E	0.008	8000	32	250
Knoxville	Sevier	Resort Tennessee	SOP-06035	0.008	6000	32	250
	1	Wastewater Systems,					
		Inc Happy Creek					
Knoxville	Sevier	Equestrian Subdivision	SOP-06036	0.0075	7500	-	

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Tennessee					
		Wastewater Systems, Inc Settler's Ridge					
Knoxville	Sevier	Resort	SOP-06038	0.0105	10500	40	263
TUIOXVIIIO	COVICI	The Preserve at	001 00000	0.0100	10000	- 10	200
		English Mountain-East					
		Sevier County Utility-					
Knoxville	Sevier	Eagle Rock	SOP-06050	0.0044	4400	22	200
		Tennessee					
		Wastewater Systems,					
Knoxville	Sevier	Inc Providence Hill Subdivision	SOP-06052	0.018	18000	90	200
Knoxville	Seviel	Integrated Resource	30P-00032	0.018	10000	90	200
		Management, Inc					
		The Landing at Bird's					
Knoxville	Sevier	Creek Subdivision	SOP-07004	0.009	9000	-	
Knoxville	Sevier	King's Bluff Cabins	SOP-07011	0.007	7000	23	304
	1	Norton Creek - Hickory					
Knoxville	Sevier	Gap STP	SOP-07021	0.06	60000	200	300
		TWSI Hidden Springs					
		Resort-Wastewater					
Knoxville	Sevier	System #2	SOP-07047	0.12	120000	400	300
		Tennessee					
		Wastewater Systems,					
		Inc Greenbriar Subdivision					
Knoxville	Sevier	Wastewater System	SOP-07055	0.0153	15300	51	300
KIIOXVIIIE	Seviel	Tennessee	301-07033	0.0133	10000	31	300
		Wastewater Systems,			1		
		Inc Mountain Folks					
Knoxville	Sevier	Community	SOP-07057	0.0069	6900	14	493
		Integrated Resource					
		Management, Inc					
		Mountainscape			40000		000
Knoxville	Sevier	Subdivision	SOP-07080	0.01	10000	31	323
		East Sevier County Utility District - The					
Knoxville	Sevier	Flats Resort	SOP-08001	0.0569	56900	186	306
TOXVIIIC	OCVICI	IRM Utility, IncCove	001-00001	0.0000	00000	100	- 500
Knoxville	Sevier	Creek Resort	SOP-08013	0.017385	17385	125	139
		Tenn-issippi Cabin					
		Rentals					
	100 100	Wonderland Acres RV		10-1	A2008-200-20	250.2500	
Knoxville	Sevier	Park	SOP-08032	0.0079	7900	79	100
		East Sevier U. D					
Knoxville	Sevier	Parkside Resort PUD	SOP-08053	0.0205	20500	68	301
		Sunset Bay					
Mm as = :!!! =	l lui-	Subdivision Phase 1-A,	COD 00000	0.007	27000	400	200
Knoxville	Union	Lot 189	SOP-02022	0.037	37000	122	303
		Hallsdale Powell Utility	005 0:555		00000		
Knoxville	Union	District - Norris Lake	SOP-04068	0.0366	36600	122	300

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		RV Resort					
Varan illa	Union	City of Maynardville - Sunset Cove	SOP-08023	0.00129	1380	12	115
Knoxville	Union	Condominiums City of Piperton,		0.00138			
Memphis	Fayette	Ridgewood Grove City of Piperton - Fisherville Road Subdivision	SOP-06018 SOP-06031	0.014	14000 32000	48	376
Memphis Memphis	Fayette Fayette	City of Piperton - Twin Lakes Subdivision	SOP-06040	0.032	74000	-	370
Memphis	Fayette	City of Piperton - Shaws Creek Subdivision	SOP-06057	0.042	42000	148	284
Memphis	Fayette	City of Piperton - Lakes of Greenbrier Subdivision	SOP-06058	0.0366	36600	130	282
Memphis	Fayette	LaGrange Pointe Phase I	SOP-07038	0.0618	61800	206	300
Memphis	Fayette	Chelsea Ridge Subdivision	SOP-08054	0.0555	55500	185	300
Nashville	Cheatham	Hidden Lakes Resort	SOP-07077	0.039	39000	130	300
Nashville	Cheatham	Pleasant View Utility District	SOP-95027	0.22575	225750	750	301
Nashville	Davidson	Open Arms Care Corp Burkitt Road	SOP-97009	0.0025	2500	1	2500
Nashville	Dickson	Love's Travel Stop - Hwy 48	SOP-10008	0.015	15000	1	15000
Nashville	Humphreys	Tennessee Wastewater Systems, Inc Richland Creek Subdivision	SOP-06045	0.045	45000	150	300
Nashville	Robertson	Tennessee Wastewater Systems, Inc Maple Green Reclamation Facility	SOP-01028	0.2	200000	175	1143
		Tennessee Wastewater Systems, Inc Cedar Hill			200000		,,,,
Nashville Nashville	Robertson	Treatment Facility Tennessee Wastewater Systems, Inc Cross Plains Treatment Facility	SOP-05039 SOP-05057	0.074	74000	400	185
Nashville	Robertson	Washington Road Treatment Facility	SOP-08045	0.0141	14100	47	300
Nashville	Rutherford	Consolidated Utility District of Rutherford County - Riverwalk	SOP-00028	0.0417	41700	139	300

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Subdivision					
Nashville	Consolidated Utility District of Rutherford County - Waldron shville Rutherford Farms Subdivision		SOP-00048	0.057	57000	190	300
Nashville	Consolidated Utility District of Rutherford County-Eagle Creek		SOP-00051	0.0273	27300	91	300
Tradition of	, tanener	Consolidated Utility District of Rutherford County - Maxwell Property Subdivision(aka		0,021			
Nashville	Rutherford	Thompson Farms) Consolidated Utility	SOP-02040	0.0213	21300	71	300
Nashville	Rutherford	District of Rutherford County - Gatewood Subdivision Section II	SOP-02041	0.0189	18900	63	300
Nashville	Rutherford	Consolidated Utility District of Rutherford County - Draper Property Subdivision	SOP-02042	0.0576	57600	192	300
Nashville	Rutherford	Consolidated Utility District of Rutherford County-Fleming Farms S/D	SOP-03008	0.057	57000	190	300
		Consolidated Utility District of Rutherford County - Stewart Creek				239	300
Nashville Nashville	Rutherford	Subdivision Consolidated Utility District of Rutherford County - Rachel's Place Subdivision	SOP-04052 SOP-05075	0.0717	71700 33100	107	309
Nashville	Rutherford	Consolidated Utility District of Rutherford County - Twelve Corners Subdivision	SOP-06008	-			
Nashville	Rutherford	Consolidated Utility District of Rutherford County - Pinnacle Hills Subdivision	SOP-06019	0.048	48000	160	300
		Consolidated Utility District of Rutherford		3.5.0			
Nashville	Rutherford	County - Crescent Ridge Subdivision	SOP-06023	0.04	40000	130	308

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Consolidated Utility					
		District of Rutherford					
Nashville	Rutherford	County - Silver Hill Subdivision	SOP-06025	0.105	105000	350	300
Nasriville	Rutheriold	Consolidated Utility	30F-00023	0.100	103000	000	000
		District of Rutherford					
		County - Cascade Falls			IN THE PROPERTY OF THE PROPERT	20000000	
Nashville	Rutherford	Subdivision	SOP-06034	0.135	135000	450	300
		Consolidated Utility					
		District of Rutherford County - Lewis Downs					
Nashville	Rutherford	Subdivision	SOP-06044	0.078	78000	260	300
Nasriville	rtatileriora	Consolidated Utility	331 33311	0.0.0	, , , ,		
		District of Rutherford					
		County - Malibu					
Nashville	Rutherford	Estates Subdivision	SOP-06048	0.04	40000	130	308
Nashville	Rutherford	Kingsmill Subdivision	SOP-06056	0.0165	16500	55	300
		Consolidated Utility					
		District of Rutherford					
Nashville	Rutherford	County - Manor Farm Subdivision	SOP-06062	0.0156	15600	52	300
Nasiiviiie	Rutherford	Consolidated Utility	001 00002	0.0100	10000		
		District of Rutherford					
		County - Springhouse					
Nashville	Rutherford	Subdivision	SOP-06066	0.09	90000	300	300
		Consolidated Utility					
		District of Rutherford County - Waldron					
Nashville	Rutherford	Crossing Subdivision	SOP-06068	0.021	21000	70	300
T T T T T T T T T T T T T T T T T T T	Tradition of a	Coloniel Estates					
		Subdivision, Section		9 STE 10	== 7 (0 kGa (5a)		
Nashville	Rutherford	XII	SOP-07022	0.051	51000	170	300
		Consolidated Utility					
		District of Rutherford County Davenport					
Nashville	Rutherford	Station Subdivision	SOP-07026	0.192	192000	640	300
Nasiiviiie	Rutherford	Consolidated Utility	001 07020	0.102	102000	0.0	
		District of Rutherford					
		County-Harvest Woods					
		Subdivision Section I,	000 000	0.0450	45000	450	200
Nashville	Rutherford	Phases I & II	SOP-07040	0.0456	45600	152	300
		Consolidated Utility District of Rutherford					
		County-Eagle Crest					
		Subdivision Sec. III					
Nashville	Rutherford	Phases I-IV	SOP-07041	0.0309	30900	103	300
		Consolidated Utility					
		District of Rutherford					
Nashville	Rutherford	County - Baird's Corner Subdivision	SOP-07046	0.0183	18300	61	300

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Consolidated Utility					
		District of Rutherford County - The Views at					
Nashville	Rutherford	Lytle Creek	SOP-07062	0.0408	40800	136	300
Nashville	Rutherford	Consolidated Utility District of Rutherford County - Alameda Subdivison	SOP-07074	0.0186	18600	62	300
Nashville	Consolidated Utility District of Rutherford County - Creekside Estates, Section I, Phase I and II, Section		SOP-07081	0.0306	30600	102	300
Nashville	Rutherford	Richmond's Retreat	SOP-08044	0.0396	39600	126	314
Nashville	Rutherford	Brown's Chapel Elementary School and Foxfire Meadows Subdivision	SOP-09004	0.0338	33800	66	512
11don 11mo	radionora	Hickory Ridge					
Nashville	Sumner	Treatment Facility	SOP-08039	0.0213	21300	71	300
Nashville	Sumner	Lockett Treatment Facility	SOP-08055	0.06	60000	200	300
Nashville	Sumner	Highland Academy	SOP-09038	0.05	50000	2	25000
Nashville	Williamson	Tennessee Wastewater Systems, Inc Millview Treatment Facility	SOP-03038	0.031	31000	103	301
Nashville	Williamson	Deer Run Retreat Center	SOP-04029	0.016	16000	1	16000
Nashville	Williamson	Eudailey Treatment Facility - Laurel Cove	SOP-05036	0.42	420000	1151	365
Nashville	Williamson	Clovercroft Treatment Facility	SOP-07015	0.04	40000	130	308
Nashville	Williamson	Tennessee Wastewater Systems, Inc Trinity Treatment Facility	SOP-07066	0.0102	10200	34	300
Nashville	Williamson	Stillwater Resource Conservation Development WWTP	SOP-07090	0.1485	148500	495	300
Nachvilla	Milliamaan	Polston Place	SOP-08057	0.03	30000	100	300
Nashville		Williamson Subdivision					
Nashville Nashville	Williamson	Water & Wastewater Authority of Wilson		0.008	22400	112	200
Nashville	Wilson	Water & Wastewater Authority of Wilson County - Ridgewater	SOP-02051 SOP-03009	0.06	60000	185	324

EFO	County	Site (Updated 11/29/11)	Permit #	Design Flow MGD	Gal/Day	Number Of Lots	GPD/LOT
		Treatment Facility					
		Water & Wastewater Authority of Wilson					
Nashville	Wilson	County - Cairo Bend	SOP-04044	0.0195	19500	65	300
Nashville	Water & Wastewater Authority of Wilson County - Sunset Harbor Treatment		SOP-05019	0.1	100000	330	303
		Water & Wastewater Authority of Wilson County - Legends Ridge Treatment					
Nashville	Wilson	Facility	SOP-06055	0.021	21000	70	300
Nashville	Wilson	Water and wastewater Authority of Wilson County - Cave Springs Treatment Facility	SOP-06067	0.002	2000	5	400
Nastiville	VVIISON		30F-00007	0.002	2000	3	400
Nashville	Wilson	Big Springs Road Treatment Facility Belle Isle Treatment	SOP-07013	0.021	21000	70	300
Nashville	Wilson	Facility	SOP-07023	0.0807	80700	269	300
Nashville	Wilson	Summitt Treatment Facility	SOP-07024	0.027	27000	90	300
Nashville	Wilson	Vesta Road Treatment Facility	SOP-07027	0.0174	17400	58	300
Nashville	Wilson	Water and Wastewater Authority of Wilson County - Cooks Road Treatment Facility	SOP-07058	0.018	18000	60	300
Nashville	Wilson	Water and Wastewater Authority of Wilson County - Barton's Treatment Facility	SOP-07076	0.04	40000	128	313
Nashville	Wilson	Northgate Business Park II	SOP-08066	0.0005	500	1	500
Nashville	Wilson	Water & Wastewater Authority of Wilson County - Tucker's Crossroads School	SOP-98049	0.006	6000	_	
. idontino	77110011	Water & Wastewater Authority of Wilson County - Logue Road	33. 333.10	3.000	3000		
Nashville	Wilson	STP Logue Road	SOP-99038	0.3	300000	-	

EFO	County	Site (Updated 8/9/10)	Permit #	Design Flow MGD	GALS/DAY	Number Of Lots	GPD/LOT	COMMENT
К	Claiborne	Buddy Daniels R.V. Park - Chapel Landing	SOP- 00067	0.01	10000	50	200	SOP Application Rec'd Prior to 7/29/07
К	Sevier	Hidden Springs Resort	SOP- 00068	0.03075	30750	145	212	SOP Application Rec'd Prior to 7/29/07
С	Bedford	Tennessee Wastewater Systems, Inc Horseshoe Bend Condominiums	SOP- 01048	0.007	7000	26	269	SOP Application Rec'd Prior to 7/29/07
N	Wilson	Water & Wastewater Authority of Wilson County - Clay Estates	SOP- 02051	0.0224	22400	112	200	SOP Application Rec'd Prior to 7/29/07
К	Sevier	Tennessee Wastewater Systems, Inc Black Bear Ridge Resort	SOP- 03002	0.03	30000	150	200	SOP Application Rec'd Prior to 7/29/07
N	Robertson	Tennessee Wastewater Systems, Inc Cross Plains Treatment Facility	SOP- 05057	0.074	74000	400	185	SOP Application Rec'd Prior to 7/29/07
К	Sevier	Tennessee Wastewater Systems, Inc Keene's Island Condominiums	SOP- 05076	0.0015	1500	6	250	SOP Application Rec'd Prior to 7/29/07
К	Sevier	Tennessee Wastewater Systems, Inc Black Bear Ridge Resort #2	SOP- 05077	0.014	14000	70	200	SOP Application Rec'd Prior to 7/29/07

EFO	County	Site (Updated 8/9/10)	Permit #	Design Flow MGD	GALS/DAY	Number Of Lots	GPD/LOT	COMMENT
к	Sevier	Tennessee Wastewater Systems, Inc Legacy Mountain North	SOP- 06002	0.04	40000	160	250	SOP Application Rec'd Prior to 7/29/07
К	Jefferson	Parrott's Bay Subdivision	SOP- 06017	0.016	16000	80	200	SOP Application Rec'd Prior to 7/29/07
М	Fayette	City of Piperton, Ridgewood Grove	SOP- 06018	0.014	14000	48	292	SOP Application Rec'd Prior to 7/29/07
к	Jefferson	Tennessee Wastewater Systems, Inc Shady Grove	SOP- 06022	0.00175	1750	7	250	SOP Application Rec'd Prior to 7/29/07
к	Blount	Tennessee Wastwater Systems, Inc Griffitts Mill Subdivision	SOP- 06033	0.06	60000	300	200	SOP Application Rec'd Prior to 7/29/07
к	Sevier	Tennessee Wastewater Systems, Inc Summit View Resort	SOP- 06035	0.008	8000	32	250	SOP Application Rec'd Prior to 7/29/07
к	Sevier	Tennessee Wastewater Systems, Inc Settler's Ridge Resort	SOP- 06038	0.0105	10500	40	263	SOP Application Rec'd Prior to 7/29/07
к	Campbell	Integrated Resource Management, Inc Flat Hollow Subdivision	SOP- 06039	0.006	6000	23	261	SOP Application Rec'd Prior to 7/29/07
СК	Jackson	Scheley's Wild Acres	SOP- 06043	0.0077	7700	28	275	SOP Application Rec'd Prior to 7/29/07
к	Sevier	The Preserve at English Mountain- East Sevier County Utility-Eagle Rock	SOP- 06050	0.0044	4400	22	200	SOP Application Rec'd Prior to 7/29/07

EFO	County	Site (Updated 8/9/10)	Permit #	Design Flow MGD	GALS/DAY	Number Of Lots	GPD/LOT	COMMENT
К	Sevier	Tennessee Wastewater Systems, Inc Providence Hill Subdivision	SOP- 06052	0.018	18000	90	200	SOP Application Rec'd Prior to 7/29/07
СН	Rhea	Tennessee Wastewater Systems, Inc Piney Bay Subdivision	SOP- 06053	0.004	4000	14	286	SOP Application Rec'd Prior to 7/29/07
М	Fayette	City of Piperton - Shaws Creek Subdivision	SOP- 06057	0.042	42000	148	284	SOP Application Rec'd Prior to 7/29/07
М	Fayette	City of Piperton - Lakes of Greenbrier Subdivision	SOP- 06058	0.0366	36600	130	282	SOP Application Rec'd Prior to 7/29/07
К	Blount	Tennessee Wastewater Systems, Inc The Reserve on the Tennessee River	SOP- 07003	0.041	41000	164	250	SOP Application Rec'd Prior to 7/29/07
К	Blount	Ashley Meadows Subdivision	SOP- 07006	0.006	6000	22	273	SOP Application Rec'd Prior to 7/29/07
СК	Putnam	The Bluffs at Cumberland Cove Subdivision	SOP- 07008	0.04375	43750	175	250	SOP Application Rec'd Prior to 7/29/07
К	Blount	Sharondel Estates	SOP- 07010	0.01342	13420	61	220	SOP Application Rec'd Prior to 7/29/07
СН	Bradley	Ocoee Utility District - Brighton Ridge & Woodbridge Subdivisions	SOP- 07034	0.02184	21840	80	273	SOP Application Rec'd Prior to 7/29/07
СК	Jackson	Cumberland Valley Sewer District for Cumberland Estates	SOP- 07044	0.0198	19800	72	275	SOP Application Rec'd Prior to 7/29/07
К	Roane	Camelot Care Center, Inc.	SOP- 07054	0.00015	150	1	150	SOP Application Rec'd Prior to 7/29/07

EFO	County	Site (Updated 8/9/10)	Permit #	Design Flow MGD	GALS/DAY	Number Of Lots	GPD/LOT	COMMENT
К	Monroe	Saddle Ridge Community	SOP- 07092	0.12125	121250	485	250	Provided flow data from 5 other similar projects
СК	Clay	Mitchell Creek Marina, LLC	SOP- 08004	0.03	30000	342	88	N/A - Marina
К	Sevier	IRM Utility, IncCove Creek Resort	SOP- 08013	0.017385	17385	125	139	N/A - RV units and rental space
К	Blount	South Blount County Utility District	SOP- 08022	0.0004	400	2	200	Merrill Taylor/Creed Headrick 2 small lake front homes
К	Union	City of Maynardville - Sunset Cove Condominiums	SOP- 08023	0.00138	1380	12	115	SOP pending termination
К	Sevier	Tenn-issippi Cabin Rentals Wonderland Acres RV Park	SOP- 08032	0.0079	7900	79	100	N/A - RV units and rental space
К	Morgan	Sunbright Municipal WWTP	SOP- 08063	0.02	20000	70	286	Homes, school and commercial
К	Jefferson	Aqua Green Utility - Peninsula	SOP- 09022	0.0175	17500	70	250	Gave variance because of change in previous SOP (Parrott's Bay)
К	Jefferson	East Sevier County Utility District - Douglas Lake Wastewater Treatment Plant	SOP- 09041	0.035	35000	128	273	Cabins, conference center, lodge, club house and 4 homes @ 300 GPD
СК	Cumberland	Four Seasons Townhomes Association (Formerly D & R Properties, LLC)	SOP- 90182	0.0035	3500	14	250	SOP Application Rec'd Prior to 7/29/07