BEFORE THE CHATTANOOGA-HAMILTON COUNTY AIR POLLUTION CONTROL BUREAU

In the Matter of:	``		24-33
in the Matter of:)	945 _[]	DOCKET NO. 24-23
CITY of CHATTANOOGA WWTP)		200121110121

DIRECTOR'S ORDER

This matter came up for hearing before the Chattanooga-Hamilton County Air Pollution Control Bureau (the "Bureau") on the 22nd day of July, 2024, following issuance of Notice of Violation No. 0520-1 to the CITY of CHATTANOOGA WASTEWATER TREATMENT PLANT, 455 Moccasin Bend Road, Chattanooga, TN., 37405, for violating special conditions 2.0 and 5.0 of their Certificate of Operation, in violation of the Chattanooga Air Pollution Control Ordinance (the "Ordinance"). Upon a determination having been made that the violations of the Ordinance did occur as alleged, it is hereby

ORDERED that a civil penalty is assessed in the amount of \$800.

FUTHER ORDERED that pursuant to the provisions of Section 41-04(d) of the Ordinance, CITY of CHATTANOOGA WWTP is assessed enforcement costs of \$420.82 that the Bureau incurred.

Payment of the total amount (\$1,220.82) is to be made by credit card, check, or money order, made payable to "Chattanooga-Hamilton County Air Pollution Control Bureau" and delivered to the Bureau Executive Director at 2034 Hamilton Place Blvd., STE 300, Chattanooga, TN 37421 by August 13, 2024. Failure to pay these costs by the due date shall constitute a further violation for the purposes of this Order and trigger the requirement of additional costs.

ENTER this 22nd day of July, 2024.

THE CHATTANOOGA-HAMILTON COUNTY AIR POLLUTION CONTROL BUREAU

By: Ron Drumeller, Executive Director

REGULAR U.S. MAIL

DOCKET NO. 24-33

DIRECTOR'S ORDER

State of Tennessee) County of Hamilton) To any Lawful Officer to Execute and Return:

SUMMON: City of Chattanooga Wastewater Treatment Plant 455 Moccasin Bend Road

Chattanooga, TN. 37405

SERVE: CITY OF CHATTANOOGA WWTP 455 Moccasin Bend Road

455 Moccasin Bend Road Chattanooga, TN. 37405

and make known to the same that he is strictly ordered by the Executive Director of the Bureau, by the authority vested in the Executive Director under the law, to take the action designated herein under the Executive Director's Order herewith attached.

Herein fail not and upon completion of service hereof return this order.

Witness this 22nd day of July 2024.

Ron Drumeller, Executive Director Chattanooga-Hamilton County Air Pollution Control Bureau

Air Pollution Control Bureau OFFICER'S RETURN

, 2024, and executed by	
day of	copy of this order to:
Came into my hand this.	delivery and service of a copy of this order to:

ame as comr	ing the s		and ordering the same as commanded.	day of 2024.
-------------	-----------	--	-------------------------------------	--------------

Officer

ENFORCEMENT COST RECAP

Docket #: 24-24 53

Source: City of Chattanooga WWTP

Activity	Rate	Unit	Value	Cost
Personnel Cost	00.00		40	\$39.31
Driving Time	\$0.98	per minute	40	
On-Scene Time	\$0.98	per minute	30	\$29.48
After Hours Cost		per incident		
Investigation	\$0.98	per minute	30	\$29.40
Vehicle Expense				
Mileage	\$0.67	per mile	30	\$20.10
ADMINISTRATION				
Report Preparation	\$0.98	per minute	60	\$58.80
NOV Preparation	\$0.98	per minute	30	\$29.40
Engineer Review	\$0.98	per minute	10	\$9.80
Engineer Manager Review	\$0.98	per minute	10	\$9.80
Director's Report Review	\$2 .27	per minute	10	\$22.66
Docket File Preparation	\$0.81	per minute	30	\$24,30
Conference Scheduling Postage	\$0.81	per minute	15	\$12.15
Certified Mail or Email	\$8.10	per NOV	8.1	\$65.61
First Class for NOV	\$0.60	per NOV		\$0.00
Sub-Total				\$350.82
Director's Conference	\$35.00	per 15 minutes	\$ 70	2
Certified Mail for Order	\$8.10	'		
First Class for Order	\$0.60			
rifst Class for Order	φ0.00			
	Enfo	rcement Cost	\$	
Other Agency				0
Fire Department Cost			18	10
		Grand	d Total: \$	420 8
		0.4		-1-
				420.87 + 1800
				800
Executive Director	-	Date	-	\$1,2
EVACUTIAE DIJECTOL		Date		81.2



CHATTANOOGA-HAMILTON COUNTY AIR POLLUTION CONTROL BUREAU

CBL CENTER II

2034 Hamilton Place Blvd., Suite 300 Chattanooga, TN 37421 | 423-643-5970

NOTICE OF VIOLATION

Email to City Attorney

Phil Noblett pnoblett@chattanooga.gov

Deputy Administrator of Wastewater Systems

Docket #: 24-33 How Served: Jerramy Wood

jwood1@chattanooga.gov

Date and Time of Violation: May 18, 2024 7:00 p.m.

Incident #: 24-107

Location of Violation: 455 Moccasin Bend Road, Chattanooga, TN 37405

Issued To: City of Chattanooga Wastewater Treatment Plant

An investigation was conducted by the Chattanooga-Hamilton County Air Pollution Control Bureau concerning a suspected violation of the City of Chattanooga Air Pollution Control Ordinance.

During the course of the investigation, the following violations were discovered.

Rule or Permit Number	Violation
Special Condition 5.0 of Certificate of Operation 5745-50100701-07C	Failure to keep drains around the biosolids staging pad clear to allow effluent (leaching) to flow into the drains.
Special Condition 2.0 of Certificate of Operation 5745-50100701-07C	Appropriate methods and technology shall be utilized to reduce or control gaseous emissions from the sludge and biosolids treatment process so as to prevent odor from these emissions from being detected beyond the plant property boundaries. Rule 12, 14 and 23 of the Ordinance.

This is a Notice of Violation for is for violation of the above permit conditions. You are required to appear before the Executive Director of the Bureau on July 9, 2024 at 9:30 a.m.

Failure to respond to this Notice of Violation could result in the Executive Director conducting a hearing with or without your presence and assessing civil penalties up to \$2,000 per violation and other incurred cost.

YOU HAVE THE RIGHT TO BE REPRESENTED BY AN ATTORNEY AT ANY CONFERENCE OR HEARING CONCERNING THE ABOVE VIOLATION

Box Deall	5/24/20		
Issued by the Executive Director	Date Issued	Served by	Date Served

Chattanooga-Hamilton County Air Pollution Control Bureau

NO. 24-107

A. Frazier: MS. Spencer: 55

INCIDENT REPORT

Date/Time Received:	5/18/2024 6:40 p.m.		Received By:	ics
Date/Time Assigned:	Same		Assigned To:	ics
Date/Time Arrived:	5/18/2024 7:00 p.m.			
Date/Time Departed	5/18/2024 7:30 p.m.			
Type of Incident:	Odor			
Location of Incident:	455 Moccasin Bend Road, Cha	ttanooga, 37405	Jurisdiction:	Chattanooga
Source:	City of Chattanooga Wastewate	er Treatment Plant		
Address:	Same			
	Permit condition 5.0 of Certifica around the biosolids staging pa flow into the drains.			
Violation(s)	Permit condition 2.0 of Certifica methods and technology shall be from the sludge and biosolids to these emissions from being det 12, 14 and 23 of the Ordinance.	ne utilized to reduct reatment process sected beyond the p	e or control gas to as to prevent	eous emissions odor from
Notice of Violation #:	0520-1 Docket #: 24-33	Conference/Due Date		

On the above time and date, I received and responded to a report of a strong disgusting odor, common with the WWTP. The complainant stated that she could not even go outside. The complainant lives on Stringer's Ridge. Upon arrival in the area, I detected a strong odor (8-10) on Moccasin Bend Road approximately 100 yards north of the staging pad for biosolids.

I went to the facility and met with Cliff Denton. I observed an inventory of biosolids that exceeded any other time. We walked around the biosolids and I observed leaching puddling in several areas. The leaching was flowing in some areas to the curb but not going to the drains. The odor at the puddles (6-8) was the same odor detected off-site. One puddling was approximately 1" deep. No significant odors were detected at the biosolids. According to Mr. Denton, the staged biosolids pH levels tested around 12. Which is an acceptable level. Mr. Denton stated that he estimates the oldest biosolids are no more than 2 weeks. Mr. Denton stated that the problem is with Synagro does not have enough contracted drivers and could be working better with potential farmers.

After a discussion with Alan Fraizer, Sydney Spencer and Ron Drumeller, it was decided that a Notice of Violation would be issued for the following violations:

Certificate of Operation 5745-501-00701-07C (07) Special Conditions 2 and 5

- 2.0 Appropriate methods and technology shall be utilized to reduce or control gaseous emissions from the sludge and biosolids treatment process so as to prevent odor from these emissions from being detected beyond the plant property boundaries. Rule 12, 14 and 23 of the Ordinance.
- 5.0 Drains around the biosolids staging pad shall be kept clear to allow effluent to flow into the drains. Furthermore, pipes from these drains shall be sufficiently maintained to allow for the free flow of effluent.

John C. Schultz - Investigator

Date

Executive Director

Date



Production versus being hauled off-site

	Wet T	ons		Wet T	ons
April 24	Production	Hauled	May 24	Production	Hauled
4/1/2024	252.66	107.03	5/1/2024	327.19	302.82
4/2/2024	218.07	299.26			
4/3/2024	321,97	411.96	5/2/2024	344.48	364.74
4/4/2024	300.95	447.49	5/3/2024	306.01	296.17
4/5/2024	216.42	315.16	5/4/2024	306.33	
4/6/2024	204.96		5/5/2024	219.63	
4/7/2024	173.66		5/6/2024	213.07	245.23
4/8/2024	165.94	319.6	5/7/2024	209.36	342.71
4/9/2024	274.97	418.06	5/8/2024	188.07	450.51
4/10/2024	392.57	447.96			
4/11/2024	358.17	330.94	5/9/2024	200.6	289.71
4/12/2024	402.83		5/10/2024	315.65	293.66
4/13/2024	352.94		5/11/2024	321.99	
4/14/2024	262.65	70.70	5/12/2024	323.23	
4/15/2024	242.88	78.79	5/13/2024	272.4	224.54
4/16/2024 4/17/2024	223.72 207.68	341.26 235.29	5/14/2024	363.64	355.3
4/17/2024	258.09	169.37	5/15/2024	299.27	249,29
4/19/2024	346.52	471.6	5/16/2024	282.41	339.71
4/20/2024	220.2	411.0			
4/21/2024	127.11		5/17/2024	289.15	254.43
4/22/2024	192.15	355.37	5/18/2024	227.56	
4/23/2024	225.94	215.57	5/19/2024	167.59	
4/24/2024	311.96	472.81	5/20/2024		
4/25/2024	282.3	560.01	Totals	5177.63	4008.82
4/26/2024	299.62	644.08	Difference	1168.	B1
4/27/2024	251.34				
4/28/2024	209.64				
4/29/2024	148.97	280.21			
4/30/2024	251.7	308.69			
Totals	7698.58	7230.51			
Difference	468.07	7			

The above recap indicates that more biosolids are being produced than are being hauled off-site leading to excessive inventory. There are two causes of odors for the handling of biosolids. When piles are disturbed, unloading and loading, and the drainage from the piles.

The biosolids inventory has worsened since the May 13, 2024, Director's Conference.

The contractor, Synagro, hauls Monday – Friday. However, the WWTP produces biosolids seven days a week.

CHATTANOOGA-HAMILTON COUNTY AIR POLLUTION CONTROL BUREAU

City of Chattanooga Moccasin Bend Wastewater Treatment Plant
Special Conditions for
Certificate of Operation No. 5745-50100701-07C
Expiration Date: April 8, 2026
*** Revised: April 16, 2024 ***

The owner and operator of this source shall adhere to all provisions of the Chattanooga Air Pollution Control Ordinance (the Ordinance) in addition to the following conditions and limitations of this certificate of operation throughout its term. Any violation of the Ordinance or any of the following conditions or limitations may lead to enforcement action by the Chattanooga-Hamilton County Air Pollution Control Bureau (the Bureau) or Board or by the U.S. Environmental Protection Agency. Provided, however, in the event that any of the following conditions or limitations are more stringent than any provision of the Ordinance, the conditions and limitations of this certificate shall control. Section numbers referred to in this certificate that are not otherwise identified refer to sections of the Ordinance. All sections of the Ordinance cited in this certificate are incorporated herein by reference.

- 1.0 Volatile organic compound (VOC) emissions from the sludge dewatering operation of the sludge and biosolids treatment process shall not exceed 2.0 tons during any period of twelve (12) consecutive calendar months. This emission limit shall be met by compliance with and enforcement of the provisions in Section 31-51 (Pretreatment Standards) of the Chattanooga City Code. These requirements are best available control technology (BACT), as determined by the Bureau Director. §4-41, Rule 25.3
- 2.0 Appropriate methods and technology shall be utilized to reduce or control gaseous emissions from the sludge and biosolids treatment process so as to prevent odors from these emissions from being detected beyond the plant property boundaries. This requirement is reasonable and proper, as determined by the Bureau Director. §4-41, Rules 12, 14, and 23
- 3.0 The permittee shall endeavor to maintain the amount of biosolids on the staging pad at no more than five (5) days of production. If this quantity is exceeded, the permittee shall notify the Bureau within twenty-four hours and submit a plan of action within forty-eight hours for reducing the quantity to the target level of five (5) days of production. These requirements are reasonable and proper, as determined by the Bureau Director. §4-10(b); §4-41, Rules 12, 14, and 23
- 4.0 An inspection of all biosolids on the staging pad shall be performed daily. For each load of biosolids, if any sign of putrefaction or mineralization is seen, if the presence of vectors (insects) is observed, or if any putrid odor is detected, a pH test of the specified load shall be conducted. If the tested pH is below 8.50, an appropriate landfill shall be notified immediately, and that load of biosolids shall be transported to the landfill as soon as

- possible. These requirements are reasonable and proper, as determined by the Bureau Director. $\S4-10(b)$; $\S4-41$, Rules 12, 14, and 23
- Drains around the biosolids staging pad shall be kept clear to allow effluent to flow into the drains. Furthermore, pipes from these drains shall be sufficiently maintained to allow for the free flow of effluent. These requirements are reasonable and proper, as determined by the Bureau Director. §4-41, Rules 12, 14, and 23
- A log shall be maintained in which the total gallons of sludge that are processed in the sludge dewatering operation during each calendar month are recorded. This log shall be kept on the premises and be available for inspection by Bureau representatives upon request during normal business hours. The information in this log shall be maintained for a period of five (5) years after its date of entry. §4-10(b)
- 7.0 A report shall be submitted by **February** 7 of each year notifying the Bureau Director of the total gallons of sludge that were processed in the sludge dewatering operation during the previous **calendar year**. \$4-10(b)
- 8.0 Testing of the sludge dewatering operation to determine the emissions of VOC may be required by the Bureau Director. If required, this test shall consist of and be performed in accordance with test methods approved by the U.S. Environmental Protection Agency and be performed in accordance with §4-3. §4-3; §4-8(c)(8)
- If the sludge and biosolids treatment process operates in such a manner as to violate any of the requirements contained in these special conditions, the owner or operator shall promptly notify the Bureau Director within twenty-four hours of the onset of the violation, and a written report shall be submitted to the Bureau Director within seven (7) days of the onset. $\S 4-10(b)$; $\S 4-12(e)$
- 10.0 This certificate of operation is not transferable from one person to another person, from one air pollutant source to another air pollutant source, or from one location to another location. $\S 4-8(c)(1)$
- 11.0 Renewal of this certificate of operation for the sludge and biosolids treatment process, if sought, must be applied for on Form E001 by the owner or operator no later than **February** 7, 2026. $\S4-8(c)(7)$



July 2nd, 2024

Ron Drumeller
Executive Director
Chattanooga - Hamilton County Air Pollution Bureau
2034 Hamilton Place Blvd Suite 300
Chattanooga, TN 37421

Subject: Response to Notice of Violation (Docket# 24-33, Incident# 24-107)

Dear Mr. Drumeller,

I am writing in response to the recent Notice of Violation. First, I want to express our sincere apologies for any inconvenience or discomfort caused by these odors. We take these complaints seriously and are committed to addressing them promptly and effectively.

Secondly, to mitigate the odor and ensure compliance with our air quality permit, we have implemented several immediate actions:

- Active Production Tracking: We are actively monitoring production levels within our plant staging with a new dashboard. This has been shared with Air Pollution Bureau staff.
- Maximized Hauling Efficiency: We have implemented new efforts to maximize the removal and relocation of biosolids through landfill operations. Our goal is to reduce our biosolids on-site to a minimal amount. Since April 2024, we have relocated biosolids masses in the amount of 14,684.8 Wet Tons to farming application sites and the landfill.
- **Permitting a Larger Land Application Site**: We have permitted a large land application site spanning approximately ~2,000 acres.
- **Utilization of additional landfills**: We have been approved to haul biosolids to three different Alabama landfills.
- Enhanced Coordination and Scheduling: We have established a more secure schedule and improved coordination processes between the City and the two divisions of our contractor (Operations and Technical Services). This has been a great success, the communication has never been more clear than it is now.
- **Continuous Housekeeping**: We continued the work we started on April 25th as well as came up with an additional method for neutralizing odors. The new method involves

- Operators spreading lime kiln dust on the leachate coming from the biosolids. This has been effective and is easily repeatable.
- **Dryer services**: Soon we will be going out to bid for biosolids dryer services. In the near term, this will reduce biosolids volumes and produce a Class A biosolid.
- Improved Odor Control: We recently visited Koch Foods to take a look at their odor control system. We are currently discussing what a system would look like for our facility.

In the long term, we are committed to a comprehensive biosolids management plan aimed at reducing biosolids volume resulting in material that is considerably less odorous. This plan has been initiated through a Request for Proposal (RFP) process. We are reviewing proposals now.

We assure you that we are dedicated to addressing these concerns promptly and transparently. We remain committed to environmental stewardship and regulatory compliance.

Thank you for your attention to this matter. Should you require any further information or clarification, please do not hesitate to contact me directly.

Sincerely,

Jacob McCrary

Jacob McCrary
Director of Operations
City of Chattanooga
Moccasin Bend Environmental Campus

CC: Mark Heinzer, Administrator Wastewater Department
Jerramy Wood, Deputy Administrator Wastewater Department
Justin Steinman, Director of Administration
Phil Noblett, Chattanooga City Attorney
Gregory Glass, Assistant City Attorney
Christopher McKnight, Staff Attorney

Moccasin Bend Environmental Campus

455 Moccasin Bend Road

Chattanooga, TN 37405

E: jmccrary@chattanooga.gov

P: 423-643-7422 M: 423-762-3504

W: www.chattanooga.gov/public-works/interceptor-sewer





Air Pollution Letter 7_2_24.pdf

Ronald Drumeller <rdrumeller@chattanooga.gov>

Mon, Jul 22, 2024 at 9:12 AM

To: Alan Frazier <afrazier@chattanooga.gov>, Sydney Spencer II <sspencerii@chattanooga.gov>

See new pictures attached

Ron Drumeller

Executive Director

Chattanooga-Hamilton County Air Pollution Control Bureau

CBL Center II

2034 Hamilton Place Blvd. Suite 300 Chattanooga, TN 37421

Office: (423) 643-5974 Phone: (678) 622-1135 rdrumeller@chattanooga.gov

www.apcb.org

----- Forwarded message ------

From: Jacob McCrary <jmccrary@chattanooga.gov>

Date: Mon, Jul 22, 2024 at 8:35 AM Subject: Re: Response Letter

To: Ronald Drumeller <rdrumeller@chattanooga.gov>

Cc: Gregory Glass <gglass@chattanooga.gov>, Phil Noblett <pnoblett@chattanooga.gov>, Jerramy Wood

<jwood1@chattanooga.gov>, Mark Heinzer <mheinzer@chattanooga.gov>, Justin Steinmann

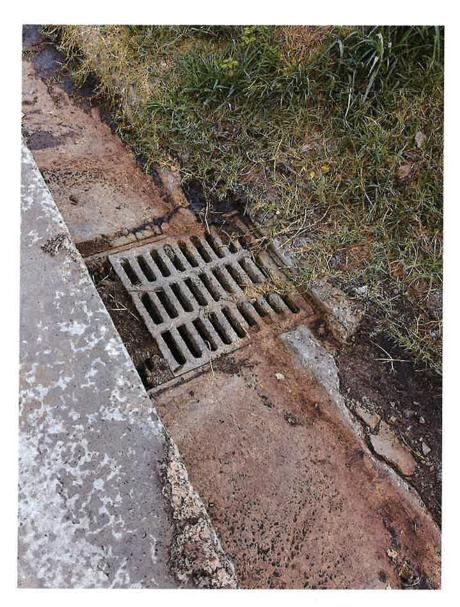
<jsteinmann@chattanooga.gov>

Good morning Mr. Drumeller:









[Quoted text hidden]

Date	Biosolids Production WT	Tons Hauled WT		Current D		
		VVI			lant Inventory	
1/1/2024	275.99	500.00	Total Produced	A STATE OF THE PARTY OF THE PAR	Staged in Plant	
1/2/2024	260.99	533.86	52,781.51	48,375.80	4,405.71	12,24
1/3/2024	291.53	467.68				
1/4/2024	340.22	550.72	Staged in	Diant (Ma	t Tonol	
1/5/2024	298.69		Staged III	Plant (We	t ions)	
1/6/2024	298.05				_	
1/7/2024	218.09					
1/8/2024	133.87	152.49				
1/9/2024	120.23		- /			
1/10/2024						
1/11/2024	93.93					
1/12/2024	204.47	213.7				
1/13/2024	205.79					
1/14/2024	203.6					
/15/2024	163.17					
/16/2024	185.67					
/17/2024	210.78		0.0	0 5,0	000.00	
/18/2024	194.27			4 40E 7		
/19/2024	107.13			4,405.7		
/20/2024	146.15					
/21/2024	153.93					
/22/2024	190.61	503.38	Legend:	#Days	Max Cap	
/23/2024	210.27	912		3 DAYS	1,080 wt	
/24/2024	189.9			8 DAYS	3,000 wt	
/25/2024	183.5	503.77		14 DAYS	5,000 WT	
/26/2024	171.21	222.95				
/27/2024	173.53					
/28/2024	180.83					
	101.01	479.03				
/29/2024	184.34					
	278.37	670.49				
/30/2024		670.49 548.42				
/30/2024 /31/2024	278.37					
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/30/2024 /31/2024 2/1/2024 2/2/2024 2/3/2024 2/4/2024 2/5/2024 2/6/2024 2/7/2024 2/8/2024	278.37 271.17 279.78 299.7 326.17 318.6 387.84 393.62 329.29 305.3 288.86 382.8 266.09	548.42 444.54 275.24 484.84 373.09 532.29				
/30/2024 /31/2024 2/1/2024 2/2/2024 2/3/2024 2/4/2024 2/5/2024 2/6/2024 2/8/2024 2/9/2024 /10/2024 /11/2024 /11/2024 /13/2024	278.37 271.17 279.78 299.7 326.17 318.6 387.84 393.62 329.29 305.3 288.86 382.8 266.09 287.45	548.42 444.54 275.24 484.84 373.09 532.29 430.42				
/30/2024 /31/2024 2/1/2024 2/2/2024 2/3/2024 2/4/2024 2/5/2024 2/6/2024 2/7/2024 2/9/2024 /10/2024 /11/2024 /11/2024 /11/2024	278.37 271.17 279.78 299.7 326.17 318.6 387.84 393.62 329.29 305.3 288.86 382.8 266.09 287.45 383.46	548.42 444.54 275.24 484.84 373.09 532.29 430.42				
/30/2024 /31/2024 2/1/2024 2/2/2024 2/3/2024 2/4/2024 2/5/2024 2/6/2024 2/7/2024 2/8/2024 2/9/2024 /10/2024 /11/2024	278.37 271.17 279.78 299.7 326.17 318.6 387.84 393.62 329.29 305.3 288.86 382.8 266.09 287.45 383.46 296.22	548.42 444.54 275.24 484.84 373.09 532.29 430.42 250.51 310.69				
/30/2024 /31/2024 2/1/2024 2/2/2024 2/3/2024 2/4/2024 2/5/2024 2/6/2024 2/8/2024 2/9/2024 /11/2024 /11/2024 /11/2024 /11/2024 /11/2024 /11/2024	278.37 271.17 279.78 299.7 326.17 318.6 387.84 393.62 329.29 305.3 288.86 382.8 266.09 287.45 383.46 296.22 329.77	548.42 444.54 275.24 484.84 373.09 532.29 430.42 250.51 310.69 580.33				
/30/2024 /31/2024 2/1/2024 2/2/2024 2/3/2024 2/5/2024 2/5/2024 2/6/2024 2/7/2024 2/9/2024 /11/2024 /11/2024 /13/2024 /13/2024 /14/2024 /15/2024	278.37 271.17 279.78 299.7 326.17 318.6 387.84 393.62 329.29 305.3 288.86 382.8 266.09 287.45 383.46 296.22 329.77 390.28	548.42 444.54 275.24 484.84 373.09 532.29 430.42 250.51 310.69 580.33				

5/12/2024	323.23	
5/13/2024	272.4	224.54
5/14/2024	363.64	355.3
5/15/2024	299.27	249.29
5/16/2024	282.41	339.71
5/17/2024	289.15	254.43
5/18/2024	227.56	
5/19/2024	167.59	
5/20/2024	106.74	320.28
5/21/2024	179.26	317.67
5/22/2024	181.24	300.49
5/23/2024	197.34	323.77
5/24/2024	217.57	553.77
5/25/2024	376.55	
5/26/2024	385.57	
5/27/2024	296.01	
5/28/2024	136.13	481.21
5/29/2024	220.07	585.44
5/30/2024	217.6	536.9
5/31/2024	232.64	502.26
6/1/2024	323.96	
6/2/2024	304.02	
6/3/2024	315.98	467.39
6/4/2024	296.07	526.75
6/5/2024	308.93	43.88
6/6/2024	304.35	45.42
6/7/2024	336.04	21.75
6/8/2024	207.67	
6/9/2024	129.04	
6/10/2024	183.64	262.71
6/11/2024	171.35	354.63
6/12/2024	174.49	287.61
6/13/2024	249.78	321.6
6/14/2024	319.15	258.97
6/15/2024	254.08	
6/16/2024	252.06	
6/17/2024	349.18	321.28
6/18/2024	318.78	334.04
6/19/2024	249.42	379.6
6/20/2024	293.59	345.67
6/21/2024	286.56	281.97
6/22/2024	329.47	
6/23/2024	296.28	
6/24/2024	144.13	372.33

Hauled	Difference	
1423.27	311.16	

6/25/2024	182.74	413.84
6/26/2024	295.94	365.7
6/27/2024	166.19	395.76
6/28/2024	108.91	582.27
6/29/2024	156.43	371.04
6/30/2024	162.41	
7/1/2024	287.15	505.54
7/2/2024	335.47	457.9
7/3/2024	300.59	549.63
7/4/2024	292.37	0
7/5/2024	315.11	479.74
7/6/2024	293.87	
7/7/2024	348.3	
7/8/2024	317.06	529.26
7/9/2024	295.51	300.53
7/10/2024	322.68	344.7
7/11/2024	341.36	517.29
7/12/2024	301.54	512.55
7/13/2024	303.87	
7/14/2024	273.63	
7/15/2024	195.25	436.34
7/16/2024	298.56	494.08
7/17/2024	299.07	639.11

Produced	Hauled	Difference
5/19/2024		
through		
7/17/2024		
15506 34	16442 67	-936 33

Acres	F2-30.1; F9-77.5;	F12-70 9-	F6-126.8 F26-80.5	67.1	F1-50.8	F1-25.1 F2-24.2	F1-9.5; F2-8.4; F3-36 3.
Phone Number	304-619-8722	423-903-9326/4 23-903-9327	304-619-8722	828-361-2080	931-580-9805	423-716-3660	931-946-5263
Miles from Plant	100	Ю	100		55	57	59.4
Zip Code	38571	37402	38571	28906	37356	37327	38585
State	Ę	Z	Ę	NC	Z	Z.	Z
A)	Crossville	Chattanooga	Crossville	Murphy	Monteagle	Dunlap	Spencer
Street Address	1253 McClanahan Drive	535 Chestnut Street, Suite 214	1253 McClanahan Drive	93 Family Church Road Suite C	1130 Jernigan Rd	2607 Rocky River Road	1133 Walling Road
Operator	Wil Mayes	Steve Clark/Rick Lowery - CLC Cattle	Wil Mayes	George Randy Dixon	Troy Stevens	Robert Clark	Jeff Pettite
Owner	ZWT Ranch (Tony Mayes)	TN River Gorge Trust	ZWT Ranch (Tony Mayes)	George Randy Dixon	Troy Stevens	Robert Clark	Jeff Pettite
Farm Fields	CU-105 (F2, 9, 12, 13)	HA-016	CU-105 (F6, 26, &27)	VB-007	GY-102 (F1)	VB-008 (F1 & F2)	VB-001

Setbacks Flagged					ON N	No	8	
Equipment on site spreading	Yes	Yes	Yes	Staged	No	No	ON.	
Staging Approved	Yes				Virtually by Matt Snyder and Jake MrCrary	Yes	Yes	
Days Staged	39		18	17	14			
Tons Applied	2315.52	414.86	2964.11	0	0			
90% Total Haul Rate (from MM)	F2-399; F9-873; F12_799·		F6-1411; F26-882; F27-946		565	381	1035	
Tons Hauled	2710.43 F2:291.27; F9: 840.76	414.86	2964.11 F6: 1293.34; F76: 815.43	92'969	507.75			
Number of Loads * = Currently Hauling	130	22	145	33	25			
1st Haul Date	6/10/2024	6/21/2024	6/24/2024	7/2/2024	7/5/2024	Working on scheduling	Working on scheduling	
Farm Fields	CU-105 (F2, 9, 12, 13)	HA-016	CU-105 (F6, 26, &27)	VB-007	GY-102 (F1)	VB-008 (F1 & F2)	VB-001	

Link to Site Book	9EQePLZjr2EmP5a-lview?usp=drivr	OWGE/VEWW3HGNyG4/view?usp=	YbABO9pA0hMIBwE/view?usp=driv		RvXiPrM8wsk8kGMk/view?usp≕drtvr		
Link to Photos	https://drive.google.com/file/d/1BU7PvP1mMdV5ifVt9EQePLZjr2EmP5a-/view?usp=drivr	https://drive.google.com/file/d/1AFTCKtxhkZeE33vVOWGEIVEWW3HGNyG4/view?usp=	https://drive.google.com/file/d/1ShAj7pRs1DzEIEnTrYbABO9pA0hMIBwE/view?usp=driv		https://drive.google.com/file/d/1wyxnyFsfW2IvoWL4RvXiPrM8wsk8kGMk/view?usp=driv		
Application Complete			Application Complete 7/11/2024				
Forms signed and pH received	Yes					Yes	Yes
Farm Fields	CU-105 (F2, 9, 12, 13)	HA-016	CU-105 (F6, 26, &27)	VB-007	GY-102 (F1)	VB-008 (F1 & F2)	VB-001