

June 12, 2026

**RE: Public Records Request – Treatment Technology Selection
and Acreage Threshold in WWTP Site Selection**

Dear Ms. Santana,

Pursuant to the Tennessee Public Records Act (T.C.A. § 10-7-503 et seq.), I am requesting copies of all documents in the possession of the City of Lebanon relating to the treatment technology selected or under consideration for the proposed new 20 MGD Wastewater Treatment Plant, and the engineering basis for the 60-acre minimum acreage threshold applied in the candidate site scoring process.

Specifically, I am requesting:

1. The design Request for Proposals (RFP), preliminary engineering report, or any equivalent planning document for the new WWTP facility, including any specifications, design criteria, or scope language identifying the treatment technology — conventional activated sludge (CAS), membrane bioreactor (MBR), moving bed biofilm reactor (MBBR), sequencing batch reactor (SBR), or other — selected or assumed for design purposes.
2. All records documenting the engineering basis for the 60-acre minimum site acreage threshold applied in the candidate site scoring matrix, including any calculation, memorandum, or consultant report showing which treatment technology and which design capacity (initial 20 MGD or ultimate 40–50 MGD buildout) the threshold assumes.
3. All technology evaluation reports, feasibility studies, or comparative analyses examining conventional activated sludge against alternative technologies (MBR, MBBR, SBR, aerobic granular sludge, or other) at the 20 MGD or 40–50 MGD scale, including any comparison of footprint requirements, capital costs, and operational costs.
4. All records addressing biological nutrient removal (BNR)

requirements for the new facility — including any analysis of anticipated nitrogen or phosphorus effluent limits for discharge to the Cumberland River (Old Hickory Reservoir) and any evaluation of how those limits affect technology selection or site footprint.

5. All correspondence between the City of Lebanon and TDEC regarding anticipated effluent limits, nutrient removal requirements, or permit conditions for the new facility's discharge to Old Hickory Reservoir.
6. All correspondence between the City of Lebanon and its engineering consultants regarding treatment technology selection, site footprint calculations, or the acreage threshold applied in the candidate site scoring process.
7. All records addressing whether any candidate site currently scored as marginal or eliminated on acreage grounds has been evaluated for viability under a compact-process technology (MBR, MBBR, or equivalent) rather than conventional activated sludge.

Please provide the responsive records in electronic format if available. If any portion of this request is denied, please provide a written explanation citing the specific statutory exemption relied upon. If any responsive record contains both exempt and non-exempt information, please redact the exempt portions and provide the remainder. Please do not withhold an entire record solely because a portion of it may be exempt.

I am willing to pay reasonable copying or processing fees. Please notify me in advance if the estimated cost exceeds \$25.00.

Thank you for your assistance. Please feel free to contact me with any questions.

Sincerely,

Ryan Todd Roark

Email: tnt.central@gmail.com