

August 8, 2025

VIA ELECTRONIC FILING

Hon. David Jones, Chairman
c/o Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

Electronically Filed in TPUC Docket
Room on August 8, 2025 at 3:30 p.m.

RE: *Limestone Water Utility Operating Company, LLC's Application to Expand its Certificate of Convenience and Necessity to Serve the Nash Ridge Subdivision, Williamson County, Tennessee, TPUC Docket No. 23-00036*

Application of Limestone Water Utility Operating Company, LLC to Expand Its Certificate of Convenience and Necessity to Serve the Adley Subdivision, TPUC Docket No. 24-00020

Petition of Limestone Water Utility Operating Company, LLC to Increase Charges, Fees and Rates and for Approval of a General Rate Increase and Consolidated Rates, TPUC Docket No. 24-00044

Dear Chairman Jones:

Attached please find Limestone Water Utility Operating Company, LLC's ("Limestone Water") July 29, 2025, response to the Tennessee Department of Environment and Conservation's July 25, 2025, Complaint Investigation & Notice of Violation regarding Grasslands. As detailed in the response, appropriate corrective actions were undertaken immediately by Limestone Water upon learning of the incident, and the line blockage caused by grease deposits and an accumulation of disposable wipes was cleared to restore proper flow in the system. Along with other remediation efforts outlined in the response, Limestone Water has conducted daily testing of the impacted area since July 25 for laboratory *E. coli* analysis, and it will report the results to TDEC, and to the Commission, in due course. The impacted area has been restored to a safe and aesthetic condition, and there are no longer any detectable odors or visible signs of discharge present.

We have learned that the resident who reported the incident has revisited the site and is pleased with our timely remediation actions and the present condition of the site. TDEC has also expressed its appreciation for Limestone Water's prompt response and remediation work.

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We appreciate our valued customers reaching out to TDEC, and we appreciate TDEC promptly alerting us. Although we are in the process of replacing this aging system, our aim remains to proactively prevent such occurrences and to respond quickly to resolve any issues should they occur. In support of our aim, Limestone Water will begin televising the Grasslands collection system and is launching a comprehensive line-cleaning program to better monitor and improve system performance. Additionally, Limestone Water's Asset Management team is in the process of evaluating additional recurring tasks and inspections to further support proactive maintenance and to lessen the likelihood, if not eliminate, future incidents.

As always, please let us know if you have any questions.

Very truly yours,

BUTLER SNOW LLP

A handwritten signature in dark ink, appearing to read 'Melvin J. Malone', is written over the printed name.

Melvin J. Malone

clw

Attachment

cc: Russ Mitten, Central States Water Resources
Vance Broemel, Consumer Advocate Division
Karen H. Stachowski, Consumer Advocate Division



July 29, 2025

TDEC - Division of Water Resources
Nashville Field Office
711 R.S. Gass Blvd
Nashville, Tennessee 37216

**RE: Limestone Water UOC – Grassland STP
Permit No. – TN0027278
Franklin, Williamson County, TN**

To the Tennessee Division of Water Resources,

This letter is submitted in response to the Sanitary Sewer Overflow (SSO) violation reported by the Division of Water Resources on Thursday, July 24, 2025, and will outline the corrective actions taken by Limestone along with the additional measures required to remediate this incident.

A representative of the Division conducted a site investigation on July 24, 2025, in response to complaints filed on July 10, 2025, regarding odors being emitted from the treatment facility and the surrounding area. It was discovered that a collection system overflow was active and flowing down to Cartwright Creek. Several trails with public access were observed to be affected due to the overflow. The Division notified Clearwater Solutions, Limestone's contract operator for the affected area, at approximately 6:15 pm local time on July 24, 2025.

Once notified by the Division, the Clearwater Solutions team responded immediately. In fact, when Limestone contacted Clearwater Solutions its technicians were already enroute to the site in response to a call received from one of Limestone's customers. Once onsite, Clearwater Solutions discovered a line blockage caused by grease deposits and an accumulation of disposable wipes. The line was cleared on July 25, 2025, to ensure proper flow was returned to the system.

Due to the contaminated area being available for public access, the Division advised that the area be corded off with caution tape and that informative warning signage be placed to ensure public safety. Limestone's team complied with the Division's request on the morning of July 25, 2025, as can be seen in the attachments below. The Division representative also required an *E. coli* analysis to be conducted within the impacted area of the receiving stream (along with an upstream control) once per day until normal conditions are restored. Daily testing of the site is continuing.



After the line was returned to operational on July 25, 2025, remediation began. Those efforts are documented as follows,

- Commencing on July 25, 2025, operations crews used pumps and hoses to agitate waterways and extracted the debris and concentrated spillage. Debris has been placed into containment bins and disposed of as a Class I solid waste as per **TN Rule 0400-11-01-.04(2)**. Those activities are ongoing.
- Commencing on July 25, 2025, all contaminated areas in the woods, where overflow reached the creek, have been shoveled, treated with lime, and covered with straw to prevent the lime from dispersing. Crews will remove any straw visible from the walking trails by August 8. However, straw at the primary overflow site will remain in place through at least August 15 to help with lime stabilization and bacterial neutralization. This area will be cleaned and restored afterward, with a berm installed around the manhole.

After an inspection by Limestone, it has been determined that the efforts made have restored the area to a safe and aesthetic condition. This inspection revealed that there are no longer any detectable odors or visible signs of discharge present.

We value our customers and the communities we serve. We appreciate them reaching out to TDEC, and we appreciate TDEC promptly alerting us. Our aim is to proactively prevent such occurrences, even at aging facilities, and to respond quickly to resolve any issues when they do occur. Further, we look forward to the approval of the pending facilities' proposed replacement so that we may proceed expeditiously with the necessary capital improvements.

We appreciate your understanding of this matter. Limestone Water UOC remains committed to resolving these compliance matters responsibly and promptly. Please do not hesitate to contact me via email at JJOHNSON@CSWRGROUP.COM should you require additional documentation or clarification.

Sincerely,

Joe Johnson

CSWR – EHS Compliance Coordinator

