

November 12, 2025

To: Tennessee Department of Environment
Division of Water Resources
Davy Crockett Tower - 9th Floor
500 James Robertson Pkwy
Nashville, TN 37243
ATTN: Wade Murphy

24-00044

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24-00020

23-00036

From: Douglas P. Turner



Re: Applicant Name: Limestone Water Utility Operating Company LLC
TDEC Permit Number: TN0027278

I'm Doug Turner, residing at [REDACTED]. I am a service customer of Limestone Water / Central States Water Resources ("Limestone/CSWR") for sewer services in the River Rest community in the Grassland Community area of unincorporated Franklin, in Williamson County TN. The new sewer treatment plant proposed by Limestone/CSWR under this permit Number and its cost to its customers will seriously impact my utility costs and monthly budget, so I must **OBJECT to this proposed new plant by Limestone/CSWR**, both personally for myself and as a homeowner representative for the River Rest Homeowners Association (RR-HOA) and advocate for the adjacent River Rest Condominiums (RR-Condos).

Background

The residents of River Rest (RR-HOA and RR-Condos), in the Grassland community of Williamson County, represent 307 of the "taps" (customers) of the 563 total taps (over 54%) for sewer services at the Grassland "Cartwright Creek" plant provided by Limestone/CSWR, a private investor-owned utility operator from St. Louis, Missouri, backed by a billionaire owner from South Carolina.

Limestone has an ongoing tariff application before the TN Public Utility Commission (TPUC) for a rate increase of **106% (more than double)** of our monthly sewer services, from **\$42.00 per month to up to \$86.64 per month**; TPUC has already granted Limestone/CSWR an interim substantial rate increase effective May 2025, pending receipt of additional required documentation from Limestone/CSWR, as even TPUC has serious questions about Limestone/CSWR's operations, cost analysis, expenses, claimed improvements, and proposed resolutions regarding the sewer treatment plant. RR-HOA has a combination of younger families on strict budgets plus older residents on limited incomes, and the majority of RR-Condos has older residents and retirees on limited incomes; **none of us can afford such a hefty increase in rates, amounting to an over \$500.00 increase annually.**

RR-HOA, RR-Condos and individual homeowners have been actively participating in the rate hearing process, having filed online comments with the TPUC, testifying in person at two hearings, and submitting documents regarding our concerns and questions to TPUC. We remotely listened to the hearings via Webex, and are encouraged by the strong efforts of the Consumer Advocate Division (CAD) of the TN Attorney General's Office.

And it has come to our recent attention that Limestone/CSWR is attempting to **increase the monthly sewer service rate for this plant to \$120.00 per month – over \$1,400.00 per year** – in line with what Central States Water Resources and its sister operation around the country are apparently attempting to charge. **A hefty amount of this planned increase is to recover the cost for an expensive, oversized, state-of-the-art sewer plant, who apparently is more to the benefit of its private investors than it is to its utility customers.**

So, we must request a Public Hearing on this matter.

Key Reasons for Requesting a Public Utility Hearing

Key reasons for requesting a public utility hearing in Tennessee generally involve disputes over rate increases, service quality problems, and unfair practices by the utility provider. But it also includes utility non-compliance, willful negligence, jurisdiction, and obfuscation - all by the applicant in order to achieve its short-term goal for investors.

1) Limestone Operations

Limestone/CSWR is running its sewer/water treatment operations like an ULCC airline - subcontracting (nearly) all its service and operations needs to achieve an Ultra Low-Cost Carrier operation, like ValueJet Airlines did in the 1990s, resulting in a plane crash and deaths. This M.O. may look good on paper, but it removes the DIRECT RESPONSIBILITY & LIABILITY from Limestone/CSWR of any irregularities, mis-steps or lapses - regardless of whether it was accidental or willful negligence; a sub-contractor could always be blamed, not Limestone/CSWR. Overlooking an operational or safety step that seems innocuous can compound into a situation that causes a system failure, if not injury or death. Thus, NO ACCOUNTABILITY.

2) Plant Capacity

The current permit level is at .25 MGD, but with taps added by previous owner Cartwright Creek, and possibly Limestone/CSWR, we are unsure if the current capacity is over the permit level for this reason and that is why the design expands to .45 MGD. Some of the data from the flow rates also gives the impression that Limestone/CSWR is frequently handling flow beyond permit limits and it was suggested this was due to issues with the collection system. We noticed that Limestone/CSWR did not submit a plan for the capacity size as recommended by the engineering company who created their report. They were recommended to submit plans for .65 MGD and instead chose to submit for .45 MGD. **What is the justification for an increased capacity wastewater treatment plant? What is the process for Limestone to add additional taps, and is there a division that is responsible for prior approval before additional taps may be added? What division is responsible for monitoring flow rates – TDEC? – and is there a compliance schedule and penalties for not being in compliance with permit capacity and requirements?** Can these things be specified within the permit.

3) Plant Size

The proposed plant is an industrial-sized, expensive, state-of-the-art sewer plant that is **not in line with the general nature of the existing River Rest neighborhood**. It includes a 47' tower that will be visible to multiple homeowners, as well as families at our neighborhood playground, pool, clubhouse, and pavilion.

4) Membrane Bioreactor (MBR) Technology

Though proven in other states, this apparently NEW TECHNOLOGY here is Tennessee. So, who oversees the design, approval and construction of the new plant? TDEC apparently has the regulatory authority for APPROVAL of the new plant, but what experts does TDEC have available to them to review, verify and approve/disapprove the "solution" proposed by Limestone/CSWR? Are they seeking expert help from other states? Are there any other State regulatory agencies that should be involved?

5) Life-Cycle Costs and Expenses

The total cost of a membrane system for the new plant indeed needs to look at the expected LIFE-CYCLE COST of a system - including scheduled or required maintenance - so that stakeholders (we, the customers who eventually pay for this through the service charges) aren't blind-sided 5, 10, 15 years down the road because the operating company (Limestone/CSWR) chose to take the CHEAPEST UP-FRONT COST, because they are expecting to "flip the plant" (sell it to someone else) 5 years down the road, so it's not their problem and they get maximum return for their investors.

6) Jurisdiction

Once the project is approved, **who or what agency has jurisdiction to inspect the construction of the plant - State or Williamson County?** You need multilayered inspection and verification procedures to make sure things are done properly, the plant is absolutely built to the specification approved by TDEC (or BETTER), and that **shortcuts in the quality of materials and construction are NOT taken**. If there currently is no such authority, then that is a **VERY BIG PROBLEM**; if the creation or expansion of an authority is being considered or proposed by Williamson County – and that process always take a lot of time – then implementation needs to retroactively include recently-built systems, so there is NOT A GAP in regulatory coverage.

7) Financial Concerns

TPUC, in its interim rate decision, agreed that the request by Limestone/CSWR of a **five (5) year ROI is inappropriate** when public owned utilities amortize debt on the range of 20 years for the major structural part of the investment. **Limestone is front-loading their expenses short-term onto the rate-payers**. Further, Limestone/CSWR did not take advantage of certain guaranteed grant money being offered for infrastructure, which would have (partially) offset the cost of a new/replacement sewer plant. Finally, the Escrow funds collected over 10+ years – **totaling \$654,000 per hearing testimony** - have apparently gone unused by Limestone and **apparently have not been considered by Limestone/CSWR as an offset** to the expenses Limestone has claimed for plant improvement and/or replacement. **While TDEC may think TPUC rate determination has no bearing on its plant approval process and decisions, it certainly does have an incredible, lasting financial impact on the rate-paying customers who have to pay for this new plant. Please think about that, TDEC members.**

8) Williamson County Unified Water & Sewer System

As I had stated in my in-person verbal testimony to the Commission at the hearing on February 13, 2025 - as well as prior testimony in a TPUC/TDED hearing at the Williamson County Community Center in 2013 - **ALL sewer and water systems in Williamson County should be owned and operated by a coordinated, county-wide public utility network**, similar to Metro Water Services in Davidson County. This is in the best long-term interest of the customer.

9) TDEC's Willful Negligence

It has become obvious that **TDEC has willfully chosen to ignore the timely resolution of failing water and sewer systems under its jurisdiction in Tennessee**, as reported by Tennessee Advisory Commission on Intergovernmental Affairs of Tennessee's aging waste systems. According to the report, **Tennessee needs more than \$3 billion by 2027 to repair, replace and expand wastewater treatment systems as infrastructure crumbles and population increases**. Media reports abound of failing systems – Chapel Hill, Monterey, Gatlinburg, and closer to home **Spring Hill, Wilson County, and... yes... our Limestone/CSWR plant here is Grassland**. See the attached image, below. TDEC has essentially buried its head in the sand the past 15 to 20 years – unforgiveable. Indeed, willful negligence on the part of a state regulatory agency.

There are many other issues that affected homeowners and members of the community may have already commented on: noise and smell, sewage leaks and plant overflows, poor communication by Limestone/CSWR aka "The Artful Dodger", false promises of only single-digit rate increases, ongoing destruction of RR-HOA's Recreation Road leading to the sewer plant (30+ years of deterioration from heavy trucks hauling sewage either into or out of the plant), and enforceable deadlines, among others. This plant is a **VERY BIG PROBLEM**, and Limestone/CSWR's oversized, over-teched, expensive proposal is **NOT ACCEPTABLE**.

So, again, we MUST request a Public Hearing on this matter of TDEC Permit Number: TN0027278.

Sincerely,



Douglas P. Turner
Resident Member - River Rest Homeowners Association
Advocate for River Rest Condominium Association

Wastewater plant failures in tennessee

Tennessee has faced numerous wastewater plant failures, leading to significant environmental and public health concerns. Here are some notable incidents:



- **Limestone Water Treatment Plant:** This plant has a history of over 10 years of violations and fines, with recent leaks into the Harpeth River. Cleanup was completed, but the facility continues to face scrutiny for its operations. [↪ 1](#)
 - **Chapel Hill Wastewater Treatment Plant:** This plant has repeatedly violated state pollution limits for treated sewage discharges, impacting the Duck River ecosystem. A lawsuit has been filed to ensure the city fixes its failing sewage infrastructure. [↪ 1](#)
 - **Monterey Sewage Treatment Plant:** This plant has had 286 days of violations since January 2022, including 145 overflows of untreated sewage. A lawsuit is planned under the Clean Water Act for these violations. [↪ 1](#)
 - **Gatlinburg Wastewater Treatment Plant:** A failure of the equalization basin caused a rupture, sending almost 1 million gallons of untreated waste into the Little Pigeon River, resulting in two fatalities. [↪ 1](#)
- These incidents highlight the ongoing challenges Tennessee faces with its wastewater treatment systems, necessitating urgent attention and improvements to ensure public health and environmental safety.