

March 24, 2025

VIA ELECTRONIC FILING

Kelly Cashman Grams, General Counsel
c/o Ectory Lawless, Docket Room Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

Electronically Filed in TPUC Docket
Room on March 24, 2025 at 1:58 p.m.

RE: *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 Ms. Grams:

We are in receipt of your data requests to Limestone Water Utility Operating Company, LLC ("Limestone"), dated March 13, 2025. Please find Limestone's responses below.

1. *Refer to pages 318-322 of Vol. II of the hearing transcript from February 19, 2025, in this matter. In the transcript, Mr. Thomas used the term "sanitary sewage overflow" ("SSO") and indicated a reporting requirement for SSOs. Provide any reports made to the Tennessee Department of Environment and Conservation or any other local or state government agency for SSOs that may have occurred at the Grasslands system from December 26, 2024, through February 19, 2025.*

Response: Please see the attached SSO Report. Between December 26, 2024, and February 19, 2025, two sanitary sewer overflows (SSOs) occurred at the Grasslands system: one on December 26, 2024, and the second on February 16, 2025. Regarding the December 26, 2024 overflow, Limestone's operations team contacted Daniel Pleasant of the Tennessee Department of Environment and Conservation (TDEC), who advised that a formal report was not necessary because the facility was operating under a Consent Order and had a history of overflows. The Consent Order referenced is WPC22-0086. However, on February 21, 2025, following a site inspection in response to a public complaint, Mr. Pleasant contacted the field operator, Kenneth Rollins, and instructed Limestone to file an official SSO Report for the February 16 incident due to evidence of an overflow observed outside of the facility fence.¹

¹ Please note that the SSO Report gives February 21, 2025, under "Date Event Began." However, that was the date that Limestone was instructed to file the report. The event began on February 16, 2025.

2. *Provide the date of any overflows in the common areas (i.e., soccer field) at the Grasslands system from December 26, 2024, through February 19, 2025.*

Response: The first incident that took place on December 26, 2024, was identified the same day and resulted in an overflow at a manhole located north of the soccer field in the timber. TDEC's Daniel Pleasant was notified on the same day. Limestone's operations team identified the issue and, in coordination with Bar Environmental, determined that the overflow was caused by pump and electrical damage resulting from blockages. To correct the issue, bypass pump installation was completed on December 28, which resolved the overflow, and the site was cleaned/remediated that same day. Limestone Water notified Mr. Pleasant of the subsequent cleanup actions. Limestone personnel did not observe that a common area (i.e., the soccer field) was impacted by this SSO. A crane, however, was necessary to resolve the issue and the open field was needed to access the manhole. Additionally, a review of the complaint reports from Mr. Pleasant that are available on TDEC's dataviewer show that TDEC observed evidence of sewage near "[t]he manhole adjacent to the soccer field...and a section of the fence adjacent to the treatment facility," but do not mention sewage on the soccer field itself. See [Complaint Details \(tn.gov\)](#).² Importantly, a report from Mr. Pleasant available on TDEC's dataviewer also states that "[n]o conditions of pollution were observed in surrounding wet-weather conveyances or receiving streams." See [Complaint Details \(tn.gov\)](#).³

The second incident occurred on February 16, 2025, the root cause of which was extremely high river levels. The high water levels submerged the discharge point in the river so the pipe could not discharge. The plant does not have a pump that forces water out of the discharge pipe; therefore, in an instance when the water level rises and submerges the pipe, water also backs up into the plant. This, in addition to the continual excessive flows to the plant from residences, resulted in an overflow occurring at both the aeration basin and from a manhole behind the plant. This incident was reported via text to Mr. Pleasant on February 16. Once the excessive rain over the February 16-18 timeframe ceased, Limestone began cleanup of the overflow area on February 18, 2025. The overflow area from the aeration basin (which would not have been treated waste) was cleaned and disinfected. The overflow from the manhole was treated and would have gone into the river as an appropriate discharge but for the submerged discharge point. Mr. Pleasant inspected the site in response to a public complaint and notified Limestone on February 21 to formally file an SSO report.

3. *Describe the specific cleanup steps and measures, including the date(s) of cleanup actions taken in response to any overflows reported in the common areas (i.e., soccer field) at the Grasslands system from December 26, 2024, through February 19, 2025.*

Response: Cleanup efforts for the SSOs occurred as follows:

December 26 Incident:

² In the event the hyperlink is inaccessible, the full link to this complaint report is:

https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:34251:17544674900141:::34251:P34251_ROW_ID:135388

³ In the event the hyperlink is inaccessible, the full link to this complaint report is:

https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:34251:17544674900141:::34251:P34251_ROW_ID:134864

Cleanup began and was completed on December 28, 2024. Debris was raked and placed in bio-waste bags for pickup by Stericycle. Lime was applied for disinfection. The wooded area was restored with new topsoil and straw. The soccer field used for access was not affected by sewage but did incur rutting from truck traffic, which prompted community complaints.

February 16 Incident:

Cleanup of the overflow area began and was completed on February 18, 2025, once the rain had stopped. The overflow area was cleaned and disinfected. Clean-up involved raking debris, bio-waste bagging, lime application, topsoil replacement, and straw to stabilize the ground.

4. *In the event of any outstanding or unresolved reports of overflows at the Grasslands system, provide the current status of such reports and actions taken to address them, any actions still to be taken, and when such actions will be completed.*

Response: There are no outstanding or unresolved reports related to SSOs at the Grasslands system. All incidents have been addressed, and appropriate cleanup measures have been completed.

Please feel free to reach out to me if you have any further questions.

Sincerely,

BUTLER SNOW LLP



Katherine Barnes Cohn

clw

Attachment

cc: Russ Mitten, Limestone Water Utility Operating Company, LLC
Karen H. Stachowski, Consumer Advocate Division
Victoria B. Glover, Consumer Advocate Division
Shilina B. Brown, Consumer Advocate Division

NPDES Sewer Overflow/Release/ByPass/Upset Event Report

version 1.15

(Submission #: HQA-N0AY-2R4F1, version 2)

Details

Originally Started By Larry Quattlebaum

Submission ID HQA-N0AY-2R4F1

Facility Name Cartwright Creek - Grasslands STP

Status Draft

Form Input

Permittee/Facility

Permit Number
TN0027278

Permittee Name
Limestone Water Utility Operating Company, LLC

Facility Name
Cartwright Creek - Grasslands STP

Sewer Overflow Event (1 of 1)

Street: river rest subdivision

Date Event Began
02/21/2025

Submission Complete

NPDES Sewer Overflow/Release/ByPass/Upset Event Report

Facility Name Cartwright Creek - Grasslands STP Submission HQA-N0AY-2R4F1 Revision 2
Form Version 1.15

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Status Draft

Form Input

Permittee/Facility

Permit Number
TN0027278

Permittee Name
Limestone Water Utility Operating Company, LLC

Photos

NONE PROVIDED

Comment

NONE PROVIDED

Notes

filed on Monday 02/24/2025 per Daniel Pleasant permission , since i did not know until Friday 02/21/2025. i called Lynn to get the amount of gallons and the duration of the spill

City

English

Street Address

near next subdivision

StructuralComponent ID

as of 1/1/2025

StructuralComponent

Detail

Next Stop: Stream Pump Station

B-Subsida Main Influent lift station

Type of Event

BRO, no weather

Est. Volume (Gallons)

35,000

PLEASE LOOKUP WATERBODY USING MAPPING TOOL

If you need help identifying receiving waterbodies, please access the following mapping page [here](#) to locate the waterbody. You can copy the Source_FeatureID value (ac TN05130107003_2000) and paste it in the Receiving Water Name below.

[BRO Waterbody Spatial Tool](#)

Name of Receiving Water

Cartwright Creek from Harpeth River to headwaters (TN05130204008_0500)

Primary Cause of Event

Inflow & infiltration

Primary Corrective Action Taken

Other - Describe Below

Describe Corrective Action Taken

groups to have consultant in order

Duration (Hours)

6.00

Location

36.01038,-86.89598

State

TN

City

franklin

Street Address

river rest subdivision

Structure/Component ID

NONE PROVIDED

Structure/Component

Outfall

Next Down Stream Pump Station

Grasslands Main Influent lift station

Type of Event

SSO, Wet Weather

Est. Volume (Gallons)

36,000

PLEASE LOOKUP WATERBODY USING MAPPING TOOL

If you need help identifying receiving waterbodies, please access the following mapping application to locate the waterbody. You can copy the Source_FeatureID value (ex: TN05130107006_2000) and paste it in the Receiving Water Name below.

[DWR Waterbodies Spatial Tool](#)

Name of Receiving Water

Cartwright Creek from Harpeth River to headwaters (TN05130204009_0500)

Primary Cause of Event

Inflow & Infiltration

Primary Corrective Action Taken

Other - Describe Below

Describe Corrective Action Taken

prepare to have containment in order

Facility Name

Cartwright Creek - Grasslands STP

Sewer Overflow Event (1 of 1)

Street: river rest subdivision

Date Event Began

02/21/2025

Duration (Hours)

6.00

Location

36.01038,-86.89598

State

TN

City

franklin

Street Address

river rest subdivision

Structure/Component ID

NONE PROVIDED

Structure/Component

Outfall

Next Down Stream Pump Station

not sure

Type of Event
SSO, Wet Weather

Est. Volume (Gallons)
36,000

PLEASE LOOKUP WATERBODY USING MAPPING TOOL

If you need help identifying receiving waterbodies, please access the following mapping application to locate the waterbody. You can copy the Source_FeatureID value (ex: TN05130107006_2000) and paste it in the Receiving Water Name below.
[DWR Waterbodies Spatial Tool](#)

Name of Receiving Water
Cartwright Creek from Harpeth River to headwaters (TN05130204009_0500)

Primary Cause of Event
Inflow & Infiltration

Primary Corrective Action Taken
Other - Describe Below

Describe Corrective Action Taken
prepare to have containment in order

Photos
NONE PROVIDED
Comment
NONE PROVIDED

Notes
filed on Monday 02/24/2025 per Daniel Pleasant permission , since i did not know until Friday 02/21/2025. i called Lynn to get the amount of gallons and the duration of the spill

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail or electronic mail upon:

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This the 24th day of March 2025.



Katherine Barnes Cohn