CIVIL ENGINEERING ASSOCIATES, LLC

June 19, 2026

Ms. Leslie Allen-Daniel, Compliance Coordinator
ADEQ – Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: City of Nashville, AR
Consent Administrative Order (CAO) – LIS 23-080
Quarterly Report #11

Dear Ms. Allen-Daniel:

In accordance with the current CAO with an effective date of November 21, 2023, please accept this update as Quarterly Report #11.

Corrective actions have begun and the City is committed to maintaining compliance with the NPDES Permit for the facility.

Smoke testing has again been delayed for circumstances beyond the City of Nashville's control. However, the City's Wastewater Department has taken steps to identify areas within the collection system that were prone to overflows during heavy rain events and performed heavy cleaning of these areas to assist in reducing overflows. Due to the City's maintenance efforts, no reported overflows occurred in calendar year 2024, but there were seven reported events between March and July of 2025. From the last half of 2025 through May of 2026 there have been no reported overflow events. With the minimal reported overflow events since going under the CAO, the City is confident that overflows can be effectively managed through routine cleaning of the collection system and requests that the SSES requirement be removed from the CAO. The City agrees that smoke testing to identify more areas of I&I should be completed but it would be of great benefit to the City to remove the requirement from the CAO.

Additionally, the Nashville Wastewater Department has spent a significant amount of funds repairing a clarifier at the treatment plant. Once it was completed, it was realized that the other clarifier was in the same condition and required major repairs. Funding for the repairs was not available from reserve funds, so funds awarded to correct the aeration system in the lagoons was transferred to the clarifier. This will cause a delay in being able to complete the necessary repairs aeration system to comply with the nitrogen and TSS violations associated with the CAO. Once the clarifier repairs are complete, a funding application will be submitted to acquire the funds needed to repair the aeration system.

In addition to the above request to remove the SSES requirement from the CAO, the Nashville Wastewater Department also requests to extend the deadline for final compliance to December 2030. Please review the information presented and requests being made for approval. If acceptable, a modification to the CAO is requested.

If more information is needed, please contact me at (501) 504-2455 or by e-mail at tfoster@ce-associates.biz.

Sincerely,
CIVIL ENGINEERING ASSOCIATES, LLC

Trey Foster, P.E.
Member/Principal

Enclosure(s)

Wastewater Treatment Facility		
Violation Noted	**Corrective Action to be Implemented**	**Status of Corrective Action**
Sludge Build-Up Treatment Pond #2	Modify Department budget to allow funds to perform yearly disposal of sludge through hauling	1. Sewer rate increase implemented January 2024. 2. Delayed due to major repairs required to clarifiers
Failures to Respond	Hold weekly Department staff meetings to ensure deadlines are met	1. Began January 2024
Ammonia Nitrogen	Department will initiate modifications to the diffused air system within the Aerated Lagoon to provide additional air to Pond #1 for proper biological process to occur	1. CDBG Funds were transferred to repairs to the WWTP Clarifier due to impending failure of the clarifier 2. Additional CDBG Funds will be applied for in 2027 to address the diffused air system
Total Suspended Solids	Department will initiate modifications to the diffused air system within the Aerated Lagoon to provide additional air to Pond #1 for proper biological process to occur	1. See above
Carbonaceous Biochemical Oxygen Demand	Department will initiate modifications to the diffused air system within the Aerated Lagoon to provide additional air to Pond #1 for proper biological process to occur	1. See above
Fecal Coliform	Implement secondary review of data prior to submittal	1. Began January 2024, ongoing
Nitrate + Nitrite	Implement secondary review of data prior to submittal and create checklist for all required sampling	1. Began January 2024, ongoing
Total Phosphorus	Implement secondary review of data prior to submittal and create checklist for all required sampling	1. Began January 2024, ongoing
Whole Effluent Toxicity	Implement secondary review of data prior to submittal and create checklist for all required sampling	1. Began January 2024, ongoing
Sanitary Sewer Overflow	Develop SSES and modify Department budget to implement an Annual Maintenance Program to rehabilitate the collection system	1. Requested for Removal, Update #11