



1163 Main Street, Suite 104
Vilonia, AR 72173
(501) 504-2455
Fax (870) 932-0432

March 14, 2025

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 #5

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 #6.

Corrective actions have begun and the City is committed to maintaining compliance with the NPDES Permit for the facility. A detailed summary of the corrective actions taken to date is enclosed for reference.

At this time, we are advising that investigative work needed to complete the SSES has been delayed due to the cost of major repairs to the clarifiers at the treatment facility. It is anticipated that funds will be available to begin the investigative portion of the SSES in August 2025. This schedule will still achieve final compliance with the CAO by December 2028; therefore, we do not believe it is necessary to amend the current CAO at this time (see revised SSES schedule under Sanitary Sewer Overflows in the enclosed table). Should final compliance be delayed, we will communicate with the appropriate office to request an amendment to the CAO.

If more information is needed, please contact me at (501) 504-2455 ext. 102 or by e-mail at tfoster@ce-associates.biz.

Sincerely,
CIVIL ENGINEERING ASSOCIATES, LLC

A handwritten signature in blue ink, appearing to read "Trey Foster", is written over a horizontal line.

Trey Foster, P.E.
Member

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. Sludge degradation to occur in 2025
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. Bids for modification to diffused air system received March 2024 2. Bids exceeded funds available 3. Funding application submitted April 2024, if approved, project will be re-bid when funds are available 4. If funding is not approved, additional funds available through the implemented rate increase will be used once sufficient funds have been accumulated
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. Smoke Testing: August 2025 2. CCTV & MH Inspection: August–October 2025 3. SSES Submittal: December 2025 4. Collection System Rehab: February 2026 – December 2027 (As Funds Allow)