

Jamie Belcourt (adpce.ad)

From: Jamie Belcourt (adpce.ad)
Sent: Monday, June 5, 2023 8:23 AM
To: 'Eggleston, Marybeth'
Cc: Foreman, Mitch; Stacie Wassell (adpce.ad); David Ramsey (adpce.ad); Richard Healey (adpce.ad); Zachary Carroll (adpce.ad); Bryan Leamons (adpce.ad); Clayton, Michael
Subject: RE: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Ms. Eggleston,

DEQ's OWQ has received and reviewed the documentation provided by NLRWU on April 28, 2023 and May 3, 2023. DEQ requests that NLRWU address the arsenic exceedances of the MAHC by investigating the cause of the high loading and identifying any noncomplying industries. Please complete this investigation within 60 days and provide a response detailing NLRWU's investigation into the cause and documentation of any industrial user not in compliance.

If you have any further questions, please do not hesitate to reach out.

Regards,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | c: 501.287.8714 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: Eggleston, Marybeth [<mailto:MEggleston@nlrwu.com>]
Sent: Wednesday, May 3, 2023 2:48 PM
To: Jamie Belcourt (adpce.ad)
Cc: Foreman, Mitch ; Stacie Wassell (adpce.ad) ; David Ramsey (adpce.ad) ; Richard Healey (adpce.ad) ; Zachary Carroll (adpce.ad) ; Bryan Leamons (adpce.ad) ; Clayton, Michael
Subject: RE: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Ms. Belcourt,

I received an email from the contract lab regarding the lead and cadmium 2021 first quarter results. I have attached the email response.

Marybeth Eggleston
Environmental Compliance & Safety Manager

North Little Rock Wastewater
7400 Baucum Pike
(PO Box 17898)
North Little Rock, AR 72117
501-945-7186



A Clean Water Agency

From: Eggleston, Marybeth
Sent: Friday, April 28, 2023 3:37 PM
To: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Cc: Foreman, Mitch <MForeman@nlrwu.com>; Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>; David Ramsey (adpce.ad) <David.E.Ramsey@adeq.state.ar.us>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; Zachary Carroll (adpce.ad) <Zachary.Carroll@adeq.state.ar.us>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>; Caipen, Beth <BCaipen@nlrwu.com>; Clayton, Michael <mclayton@nlrwu.com>
Subject: RE: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Ms. Belcourt,

Thank you for speaking with me yesterday about the pretreatment information you requested.

I have attached a corrected Maumelle 2022 monitoring results report. As part of our review, we found a data entry mistake for the 5/10/2022 Cadmium during our review. We believe this result may have been reported in the wrong units and have asked for the contract lab to verify this. For example, converting units from mg/l to µg/l may be the result of human error.

I sent the contract lab (ESC) an email on April 3, 2023, asking for verification of the 2021 first quarter results in question with no response back. I called the contracted lab (ESC) this morning, April 28, 2023, asking for verification of the 2021 first quarter results in question and talked to Ashley Greene. Ms. Green said they had pulled QC and did not see any problems and said she would send something in writing, I will send that information as soon as we receive it. As of January 1, 2023, we no longer use ESC as a contracted lab. We have had past instances where we have requested verification of results and corrected reports were sent shortly after.

There was no additional testing conducted in 2021 for the exceedances of lead and cadmium. There was a Priority Pollutant Scan (PPS) for Five Mile conducted in 2021 and all permitted industries conduct metals testing twice a year. I have attached those results along with a spreadsheet where we reviewed data from 2018-2023. During this data review we found the highest lead result was 134 µg/l and found one other result for cadmium that exceeded

We have revised our procedure for reviewing sampling results conducted by contract labs. Below you will find a list of those revisions.

- Have a check system in place to flag high results so that we can notify DEQ and resample.
 - Created a new spreadsheet for results to be entered into that will highlight when any result is over the MAHC total.
- Multiple people that will review quarterly data as we receive results as part of the new checks and balances procedures.

If you have any questions, please feel free to reach out to me or Mitch Foreman, Pretreatment Supervisor. If you would like an in-person meeting, we are available at your convenience.

Thank you,

Marybeth Eggleston
Environmental Compliance & Safety Manager
North Little Rock Wastewater
7400 Baucum Pike
(PO Box 17898)
North Little Rock, AR 72117
501-945-7186



A Clean Water Agency

From: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Sent: Thursday, April 27, 2023 11:48 AM
To: Eggleston, Marybeth <MEggleston@nlrwu.com>; Caipen, Beth <BCaipen@nlrwu.com>
Cc: Foreman, Mitch <MForeman@nlrwu.com>; Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>; David Ramsey (adpce.ad) <David.E.Ramsey@adeq.state.ar.us>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; Zachary Carroll (adpce.ad) <Zachary.Carroll@adeq.state.ar.us>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>
Subject: RE: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Hello,

I spoke with Mr. Foreman on April 21, 2023 regarding your concerns. While speaking to Mr. Foreman, I requested information and/or documentation on any resampling that may have occurred as a result of the detected exceedances of lead and cadmium during the 2021 reporting year. Additionally, I also inquired about NLRWU meeting the MQLs and Detection Levels Achieved within the facility's annual reports. Mr. Foreman indicated that he would defer to Ms. Eggleston in regards to these questions.

Please provide a response to the above.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
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ARKANSAS
ENERGY & ENVIRONMENT

From: Jamie Belcourt (adpce.ad)
Sent: Monday, April 17, 2023 3:23 PM
To: 'Eggleston, Marybeth' <MEggleston@nlrwu.com>; Caipen, Beth <BCaipen@nlrwu.com>
Cc: Foreman, Mitch <MForeman@nlrwu.com>; Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>; David

Ramsey (adpce.ad) <David.E.Ramsey@adeq.state.ar.us>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; Zachary Carroll (adpce.ad) <Zachary.Carroll@adeq.state.ar.us>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>

Subject: RE: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Hello Ms. Eggleston,

I received and reviewed the information that was provided to me on 4/14/2023. I appreciate the quick response.

Mr. Foreman – If you are available tomorrow (4/18/2023), I will give you a call. Please provide a good phone number to reach you at.

Is there a particular time that is better for you? If tomorrow is not a good day, please let me know when you'll be available.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | **Office of Water Quality**
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ARKANSAS
ENERGY & ENVIRONMENT

From: Eggleston, Marybeth [<mailto:MEggleston@nlrwu.com>]

Sent: Friday, April 14, 2023 3:16 PM

To: Jamie Belcourt (adpce.ad); Caipen, Beth

Cc: Foreman, Mitch; Stacie Wassell (adpce.ad); David Ramsey (adpce.ad); Richard Healey (adpce.ad); Zachary Carroll (adpce.ad); Bryan Leamons (adpce.ad)

Subject: RE: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Ms. Belcourt,

We have not received a response from the contracted lab (ESC) verifying the 2021 second quarter Lead and Cadmium results for all for NLRW treatment plants.

I have attached the 2021 and 2022 sampling analytical data with chain of custodies for all NLRW treatment plants and Notices of Violation for all non-compliant SIUs for 2021 and 2022 you requested. I also attached a corrected Maumelle 2021 monitoring results report. We found a data entry mistake for the 2/2/2021 Antimony during our review.

Mitch Forman and I left you a voicemail this morning. We would like to talk to you regarding the Lead and Cadmium explanation and the MQLs. I will be out of the office next week, but Mitch Foreman will be available.

Thank you,

Marybeth Eggleston
Environmental Compliance & Safety Manager
North Little Rock Wastewater
7400 Baucum Pike
(PO Box 17898)
North Little Rock, AR 72117
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A Clean Water Agency

From: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Sent: Thursday, April 13, 2023 3:27 PM
To: Caipen, Beth <BCaipen@nlrwu.com>
Cc: Foreman, Mitch <MForeman@nlrwu.com>; Eggleston, Marybeth <MEggleston@nlrwu.com>; Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>; David Ramsey (adpce.ad) <David.E.Ramsey@adeq.state.ar.us>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; Zachary Carroll (adpce.ad) <Zachary.Carroll@adeq.state.ar.us>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>
Subject: RE: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Ms. Caipen,

Do you have an update from your lab?

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
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ARKANSAS
ENERGY & ENVIRONMENT

From: Caipen, Beth [<mailto:BCaipen@nlrwu.com>]
Sent: Friday, April 7, 2023 8:58 AM
To: Jamie Belcourt (adpce.ad)
Cc: Foreman, Mitch; Eggleston, Marybeth; Stacie Wassell (adpce.ad); David Ramsey (adpce.ad); Richard Healey (adpce.ad); Zachary Carroll (adpce.ad); Bryan Leamons (adpce.ad)
Subject: RE: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Jamie

We have contacted the lab (ESC) to verify the results for the lead and cadmium on 2/2/2021. Hopefully, they will get back with us in regard to our request. As soon as we hear from them, we will send you all the information you asked for. Thank you for your patience.

Beth

Beth Caipen
Pretreatment Clerk
North Little Rock Wastewater
7400 Baucum Pike
(PO Box 17898)
North Little Rock, AR 72117
501-945-7186



A Clean Water Agency

From: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Sent: Monday, April 3, 2023 9:18 AM
To: Caipen, Beth <BCaipen@nlrwu.com>
Cc: Foreman, Mitch <MForeman@nlrwu.com>; Eggleston, Marybeth <MEggleston@nlrwu.com>; Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>; David Ramsey (adpce.ad) <David.E.Ramsey@adeq.state.ar.us>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; Zachary Carroll (adpce.ad) <Zachary.Carroll@adeq.state.ar.us>; Bryan Leamons (adpce.ad) <Bryan.Leamons@adeq.state.ar.us>
Subject: NLR Wastewater Utilities - 2021/2022 Pretreatment Program Annual Reports - NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626

Hello,

North Little Rock Wastewater Utilities' (NLRWU) January 1, 2022 – December 31, 2022 Pretreatment Program Annual Report (NPDES Permits AR0020303, AR0020320, AR0038288 & AR0033626) was received and reviewed. In addition, the Pretreatment Program Annual Report for the January 1, 2021 - December 31, 2021 reporting year was reviewed.

Please provide Notices of Violation for all noncompliant SIUs for the 2021 and 2022 reporting years, an explanation for >1,000 µg/l Lead and Cadmium results at several of NLRWU plants on February 2, 2021, and meeting the required MQLs in the effluent samples at all plants.

Further, please submit for review the complete influent and effluent sampling analytical data, along with chain of custody, for the samples taken on the dates below at all treatment plants.

- February 2, 2021
- May 5, 2021
- August 10, 2021
- October 27, 2021
- January 5, 2022
- May 10, 2022
- August 16, 2022
- October 26, 2022

Thank you,

Jamie Belcourt | State Pretreatment Coordinator

**Division of Environmental Quality | Office of Water Quality
Policy and Administration**

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