

## Jamie Belcourt (adpce.ad)

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**From:** npw@nashar.org  
**Sent:** Thursday, May 4, 2023 9:33 AM  
**To:** Jamie Belcourt (adpce.ad)  
**Subject:** RE: City of Nashville - AR0021776 - Annual Pretreatment Report

Jamie,

Thank you. We will see that these issues are corrected on future reports.

Thank you

Larry

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**From:** Jamie Belcourt (adpce.ad)  
**Sent:** Thursday, May 4, 2023 8:50 AM  
**To:** npw@nashar.org; kevinashville26@yahoo.com  
**Cc:** Stacie Wassell (adpce.ad) ; Richard Healey (adpce.ad) ; Bryan Leamons (adpce.ad) ; David Ramsey (adpce.ad)  
**Subject:** City of Nashville - AR0021776 - Annual Pretreatment Report  
**Importance:** High

Mr. Dunaway,

The City of Nashville's (Nashville) Annual Pretreatment Report (NPDES AR0021776) for the January 1, 2022, through December 31, 2022 reporting year, has been received and reviewed. The Annual Pretreatment Report was due to DEQ on February 28, 2023. Nashville submitted the Report to DEQ on April 5, 2023.

During initial review of the report, the following issues were noted:

1. Non-detect (N/D) was reported for several parameters for multiple quarters. Results must be reported as indicated by the laboratory's report. For each analytical result that is less than the EPA MQL or the Detection Level Achieved, please indicate that within the specific quarter on all future reports (e.g.,
2. The method used by the laboratory must be indicated for each parameter. In the 2022 Report, the method reported for arsenic analysis was EPA Method 335.3; however, the laboratory analytical report indicated that EPA Method 200.8 was used for analysis of arsenic.

On April 11, 2023, DEQ requested the laboratory reports with the influent sampling analytical data for November 30, 2022, and the effluent sampling analytical data for the samples taken on March 11, 2022, May 13, 2022, and December 14, 2022. DEQ received the requested laboratory reports on April 21, 2023. DEQ reviewed the laboratory reports and noted the following issues of concern:

1. Influent data, November 2022: Mercury was detected at 1.81 µg/L. This measurement was verified by the laboratory report that was submitted. The MAHC for mercury for your facility is 1 µg/L.
  - DEQ requests that Nashville address the mercury exceedance of the MAHC by investigating the cause of the high mercury result and identifying any noncomplying industries.
  - Please provide a response detailing Nashville's investigation into the cause and documentation of any industrial user (IU) not in compliance.
2. Effluent data, March 11, 2022: The pretreatment annual report indicates that mercury was detected at 0.000129 µg/L. However, the laboratory report provided reported this value in mg/L. The correct conversion to µg/L yields a result of 0.0129 µg/L. Please be sure to report the correct converted value in µg/L in future reports.

In addition, please specify if the WQ level/limit is a limit set by Nashville so that it is not confused with an EPA or DEQ water quality standard or criteria. Further, the report indicates that cyanide was detected at 9.2 µg/L. This measurement was verified by the laboratory report that was submitted.

3. Effluent data, May 13, 2022: The pretreatment annual report indicates that mercury was detected at 0.0000798 µg/L. However, the laboratory report provided reported this value in mg/L. The correct conversion to µg/L yields a result of 0.0798 µg/L. Please be sure to indicate the correct converted value in µg/L in future reports. In addition, please specify if the WQ level/limit is a limit set by Nashville so that it is not confused with an EPA or DEQ water quality standard or criteria.

Please respond to this email to let me know you have received it.

Thank you,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality** | **Office of Water Quality**  
**Policy and Administration**

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