



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

Nashville Environmental Field Office  
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Nashville, TN 37216

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July 2, 2024

Chandler Sullivan, PT Coordinator  
e-copy: pretreatment@wadc.us  
Water Authority of Dickson County  
1198 Rock Church Road  
Dickson, TN 37055

Re:    **Pretreatment Compliance Inspection**  
      WADC Pretreatment Program  
      NPDES Permit Nos. TN0066958  
      Dickson County

Dear Mr. Sullivan:

Thank you for your time on June 3, 2024, when we met to conduct a Pretreatment Compliance Inspection (PCI) of Water Authority of Dickson County's (WADC) industrial pretreatment program. I was assisted by Mrs. Samantha O'Neil, also of the Division of Water Resources. The comments below are based on the results of this inspection.

1. After reviewing the previous inspection report and response, it appears that WADC has addressed all items of note.
2. Permit states monitoring reports must be submitted by email. TN Rule 0400-40-14-.08(7) requires any Control Authority hoping to receive electronic documents must satisfy the requirements of 40 CFR Part 3. WADC does not meet the requirements and therefore must receive documents through other means.
3. Local limit for Cr IV is listed as 1.5 in permits and 15 in local limits. Either the local limits or permit should be addressed and revised.
4. Cyanide is an individual allocation but per approved local limits from May 2023, cyanide limits were calculated on a per industry basis. The IU permit must be revised to reflect the correct cyanide limit.
5. Part 1.5 of Sumiden's permit requires quarterly monitoring for Total Toxic Organics (TTO), but the certification states that they only need to certify semi-annually. Sumiden is currently sampling for TTO's rather than submitting the certification. The IU permit must be revised to clarify TTO requirements for the industry.

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6. Permits cannot be administratively extended past five years; the current permit has language for extension but would only be for 23 days.

I appreciate the cooperation and hospitality shown during the inspection. Please provide documentation of a plan to address these items by **August 1, 2024**. If you have any questions or comments, please contact me at (615) 961-3875 or [Christina.Wingett@tn.gov](mailto:Christina.Wingett@tn.gov).

Sincerely,

*Christina Wingett*

Christina Wingett  
Environmental Consultant,  
Division of Water Resources

e-copy: Samantha O'Neil, TDEC DWR, [samantha.oneil@tn.gov](mailto:samantha.oneil@tn.gov)  
Nick Tatum, WADC, [ntatum@wadc.us](mailto:ntatum@wadc.us)

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