

June 18, 2015

Tim Joyner , General Manager City of Cabot 208 North 1st. Street Cabot, AR 72023

RE: Cabot Water & Wastewater Comm Inspection

AFIN: 43-00059 Permit No.: AR0021661

Dear Mr. Joyner,

On May 13, 2015, I performed a Compliance Evaluation Inspection and a Sanitary Sewer Overflow Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or emailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by July 2, 2015.

If I can be of any assistance, please contact me at mcadoo@adeq.state.ar.us or 501-683-0827.

Sincerely,

Erica McAdoo

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District 9 Field Inspector

Water Division

	ADEO		WATER I	DIVISION I	NSF	PECT	ΓΙΟΝ	REPORT
	ADLQ	AF	IN: 43-00059 PI	ERMIT #: AR002	1661		[DATE: 5/13/2015
Α	RKANSAS	CC	OUNTY: 43 Lonok	(e	PDS	#: 0847	724	MEDIA: WN
Dep	partment of Environmental Quality	GF	S LAT: 34.5263	LONG: -92.6903	LOCA	TION:	Genera	al Area
	FACILITY INFORMAT	ION		IN	SPEC	TION II	NFOR	MATION
	: bot Water & Wastewater Comm			FACILITY TYPE: 1 - Municipal	273	TOR ID#:		
	Marshall Lane			FACILITY EVALUATION RATIN 5 - Satisfactory				oliance Evaluation
-	bot			(-)	TRY TIME: 9:00	EXIT T		PERMIT EFFECTIVE DATE:
	RESPONSIBLE OFFIC	CIAL		3/13/2013	3.00	10.	00	3/1/2013 PERMIT EXPIRATION DATE:
	: / TITLE							2/28/2018
	n Joyner / General Manager			FAYETTEVILLE	SHAL	E REL	ATED:	N
	y of Cabot			FAYETTEVILLE				
	ng address: B North 1st. Street							IPANTS
_	STATE, ZIP:			NAME/TITLE/PHONE/FAX/EMA	IL/ETC.:			II AII I O
Ca	bot AR 72023			Chris Naus, AD		•		
	IE & EXT: / FAX:			Clark Baker, Al				
5U'	1-605-1740 /			Jana Kohlman,				erator # 0/5/5
				Mike Tillman, U David Long, US				
CC	NTACTED DURING INSPECTION:	Yes	S	David Long, 03	LFA	nspeci	.OI	
			AREA EVA					
S	PERMIT (s=s)	atisfac S	tory, M=Marginal, U=Unsati FLOW MEASUR		/Evaluate		RMWA	TED
S	RECORDS/REPORTS	N	LABORATORY	VEINIEIN I	S			ITE REVIEW
S	OPERATION & MAINTENANCE	S		CEIVING WATER				TORING PROGRAM
N	SAMPLING	S		LING/DISPOSAL	N	_	TREAT	
**	OTHED:	J	GLODGE HAND	LINO/DIOI COAL	"			IVILIAI

SUMMARY OF FINDINGS

Effluent sampling device requires maintenance. The sample tubing had spots of algae and/or debris throughout the inner parts of the tubing. The effluent sample container was dirty and needs to be clean at all times. The effluent sample unit thermometer was not standing upright and displayed a temperature of 10° Celsius and calibration records were not available. Similarly, the influent sample device tubing was dirty and contained spots of debris within the tubing. The influent sample is collected once per year, therefore the unit needs to be cleaned thoroughly and tubing cleaned or replaced prior to influent sampling. This is a violation of Part III, Section B.1 of the permit.

The UV disinfection chamber auto scrapers were not on, and a large amount of algae was growing on the UV bulbs within the chambers which can prevent sufficient UV contact time with the effluent. This is a violation of Part III, Section B.1 of the permit.

Solid waste that is removed or skimmed from treatment areas must be dried and placed into waste management bins. Solid waste was observed on the ground in several locations and needs to be properly disposed of. Similarly, several old pumps located outside awaiting disposal are covered with dried solids and exposed to the elements. These need to be properly cleaned and moved to a covered area until they can be moved off site. This is a violation of Part III, Section B.6 of the permit.

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There are four stationary pumps and two portable diesel pumps available for the Influent Force Main. Only one pump was required and running at the time of this inspection, and one stationary pump was not functioning properly. The non-functional pump is being repaired.

The Equalization Basin shows signs of mild sloughing along the banks and will need to be monitored and stabilized accordingly.

INSPECTOR'S SIGNATURE: Erica McAdoo DATE: 6/18/2015

SUPERVISOR'S SIGNATURE: Jason Bolenbaugh DATE: 6/18/2015

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S □M □U □NA □NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	ØY □N □NA □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	ØY □N □NA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	ØY □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:	ØY □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	ØS □M □U □NA □NE
DETAILS:	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠S □M □U □NA □NE
a. DATES AND TIME(S) OF SAMPLING:	☑Y □N □NA □NE
b. EXACT LOCATION(S) OF SAMPLING:	Øy □n □na □ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y □N □NA □NE
e. RESULTS OF CALIBRATIONS:	☑Y □N □NA □NE
f. RESULTS OF ANALYSES:	☑Y □N □NA □NE
g. DATES AND TIMES OF ANALYSES:	☑Y □N □NA □NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	□S □M □U □NA ☑NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	⊠s □m □u □na □ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: Facility uses a data I that records pump run times and uses the pump flow rate to calculate and record daily flows.	logger ☑Y □N □NA □NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☑S □M □U □NA □NE
DETAILS:	
TREATMENT UNITS PROPERLY OPERATED:	ØS □M □U □NA □NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	⊠S □M □U □NA □NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	□S □M □U ☑NA □NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	□S □M □U ☑NA □NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	⊠S □M □U □NA □NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	⊠S □M □U □NA □NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	⊠S □M □U □NA □NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y □N □NA □NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y □N □NA □NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	□y Øn □na □ne
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	□y □n ☑na □ne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	□y □n ☑na □ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□Y ØN □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y □n ☑na □ne

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y □N □NA □NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	□Y □N ☑NA □NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y □N □NA □NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y □N □NA □NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	□Y □N ☑NA □NE
b. PROPER PRESERVATION TECHNIQUES USED:	□Y □N □NA ØNE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y □N □NA □NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□y □n ☑na □ne
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:	☑y □n □na □ne
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y □N □NA □NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	□Y □N ☑NA □NE
4. CALIBRATION FREQUENCY ADEQUATE:	☑Y □N □NA □NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y □N □NA □NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y □N □NA □NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y □N □NA □NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	□S □M □U □NA ☑NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	□Y □N □NA ☑NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	OY ON ONA MINE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	□Y □N □NA ☑NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	□Y □N □NA ☑NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	OY ON ONA MINE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	OY ON ONA MINE
7. COMMERCIAL LABORATORY USED:	□Y □N □NA ☑NE
a. LAB NAME: Sorrells Research	
b. LAB ADDRESS: 8001 National Drive, Little Rock, AR	
c. PARAMETERS PERFORMED: <u>DO, pH, TSS, Fecal coliform, CBOD, NH3-N</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	OY ON MA ONE
a. PROPER ORGANISMS USED:	OY ON MA ONE
b. PROPER DILUTION SERIES FOLLOWED:	DY DN MA DNE
c. PROPER TEST METHODS AND DURATION:	OY ON MA ONE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□Y □N ☑NA □NE
1	

SECTION G	: EFFLUENT/R	•		•	1. 45-00033, 1 CITIII	. 7110021001				
	N VISUAL OBS					ØS □M □	IU □NA □NE			
DETAILS:					I					
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER			
001	No	No	No	No	No	clear				
			1	1	1	1	•			
SECTION H	: SLUDGE DIS	POSAL								
SLUDGE [DISPOSAL ME	ETS PERMIT F	REQUIREMEN	TS			U ⊠NA □NE			
DETAILS:					<u>.</u>					
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			□s □м	□u ☑na □ne			
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: □S □M □U ☑NA □N 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: □S □M □U ☑NA □N										
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PU	BLIC CONTACT SITE):					
	SAMPLING IN									
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	ΓS			U ⊠NA □NE			
DETAILS:										
1. SAMPLES	OBTAINED THIS INSPE	ECTION:				□Y	□N ☑NA □NE			
2. TYPE OF S	AMPLE: GRAB:	□COMPOSITE:	METHOD: FREQUE	ENCY:						
3. SAMPLES	PRESERVED:						□N ☑NA □NE			
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□N ☑NA □NE			
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE	VICE:				□N ☑NA □NE			
6. SAMPLE R	EPRESENTATIVE OF \	VOLUME AND NATUR	E OF DISCHARGE:				□N ☑NA □NE			
7. SAMPLE S	PLIT WITH PERMITTER	E:				□Y	□n ☑na □ne			
8. CHAIN-OF-	CUSTODY PROCEDUI	RES EMPLOYED:					□N ☑NA □NE			
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IIT:			□Y	□N ☑NA □NE			
	: STORM WATI				<u>, </u>					
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5		IU ⊠NA □NE			
DETAILS:							D. D. D.			
	PDATED AS NEEDED:_						□N ØNA □NE			
	INCLUDING ALL DISCH		CE WATERS:				ON MA ONE			
	N PREVENTION TEAM						□N ØNA □NE			
	N PREVENTION TEAM		D:				□N ☑NA □NE			
	DTENTIAL POLLUTANT		D.I. FALCO				ON MA ONE			
	DTENTIAL SOURCES A						□N ☑NA □NE			
	STORM WATER DISCH	AKGES AKE AUTHOR	KIZED:				ON MA ONE			
	RUCTURAL BMPS:	20.					ON MA ONE			
	ON-STRUCTURAL BMF						ON MA ONE			
	PERLY OPERATED AN						□N ☑NA □NE			
11. INSPECTIO	ONS CONDUCTED AS I	KEQUIKED:				⊔Y	□N ☑NA □NE			

DMR Calculation Check

Reporting Period:	From	2015	03	01	_ To _	2015	03	31
		Year	Month	Day		Year	Month	Day
Parameter Checked:		NH3-N	-					
		Loading				Concer	ntration	
		Mass				Mon	thly	
	Mo	o. Avg Ibs/day	′	Mo. A	Avg mg	g/l	7-day Avg	mg/l
Reported Value:		6.2			.02			
Calculated Value:		6.2			.02			
Permit Value:		105.1			2.1		5.2	

If calculated value does not equal reported value, explain: Calculated using Q and analytical data in a DMR Spreadsheet

Inspection Report: Cabot Water & Wastewater Comm, AFIN: 43-00059, Permit #: AR0021661

	Water Division Photographic Evidence Sheet									
Location:	ocation: Cabot Water & Wastewater Comm									
Photograp	her:	Erica McAdoo, ADEQ Inspector	Date:	5/13/2015	Time:	0900				
Witness:										

Description: Influent Sampler containers and tubing are dirty





Inspection Report: Cabot Water & Wastewater Comm, AFIN: 43-00059, Permit #: AR0021661

	Water Division Photographic Evidence Sheet											
Location:	Location: Cabot Water & Wastewater Comm											
Photograp	Photographer: Erica McAdoo, ADEQ Inspector Date: 5/13/2015 Time: 0900											
Witness:					Photo #:	3						
Description	n· I	Effluent sample tubing is clean. Theri	nometer	bracket has rusted	d from refrige	rator						





Water Division Photographic Evidence Sheet

Location: Cabot Water & Wastewater Comm

Photographer: Erica McAdoo, ADEQ Inspector Date: 5/13/2015 Time: 0900

Witness: Photo #: 5

Description: Effluent sample thermometer was not standing upright in the refrigerator.

Thermometer reading was 10° C



Photographer:	Erica McAdoo, ADEQ Inspector	Date:	5/13/2015	Time:	0900
Witness:				Photo #	6

Description: UV Disinfection System



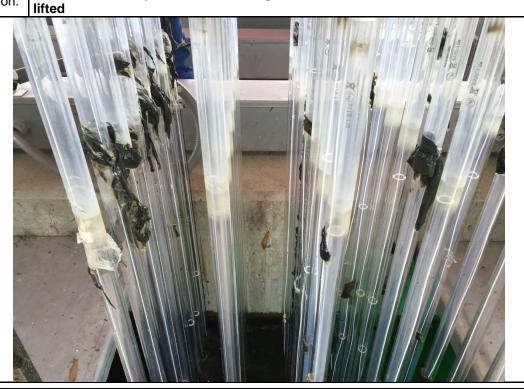
Water Division Photographic Evidence Sheet

Location: Cabot Water & Wastewater Comm

Photographer: Erica McAdoo, ADEQ Inspector Date: 5/13/2015 Time: 0900

Witness: Photo #: 7

Description: UV Disinfection System- sheets of algae fell from the bulbs as the chamber was



Photographer: Erica McAdoo, ADEQ Inspector Date: 5/13/2015 Time: 0900
Witness: Photo #: 8

Description: UV Disinfection System- sheets of algae fell from the bulbs as the chamber was lifted. (Using only a metal algae screen prior to UV disinfection may not be adequate in skimming algae)

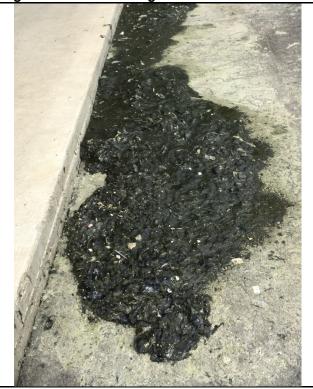


	Water Division Photographic Evidence Sheet										
Location:	Location: Cabot Water & Wastewater Comm										
Photograp	her:	Erica McAdoo, ADEQ Inspector	Date:	5/13/2015	Time:	0900					
Witness:	Witness: Photo #: 9										
Description	า: E	Example of metal grate used for skin	nming alg	gae prior to the U	/ chamber						

Photographer:	Erica McAdoo, ADEQ Inspector	Date:	5/13/2015	Time:	0900
Witness:				Photo #:	10

Description:

Algae skimmed from the UV chamber, left on the ground to dry prior to being taken to waste management. Preferably, a bin or shallow drying device should be used in lieu of placing the material on the ground.



Water Division Photographic Evidence Sheet Location: Cabot Water & Wastewater Comm Photographer: Erica McAdoo, ADEQ Inspector Date: 5/13/2015 Time: 0900 Witness: Photo #: 11

Description: Solid waste was observed outside of the waste management bin



	Water Division Photographic Evidence Sheet										
Location:	ocation: Cabot Water & Wastewater Comm										
Photograp	her:	Erica McAdoo, ADEQ Inspector	Date:	5/13/2015	Time:	0900					
Witness:					Photo #:	13					

Description: Old pumps covered with solid waste are outside, exposed to the elements







Figure 1: Google Earth Image of the facility and receiving stream

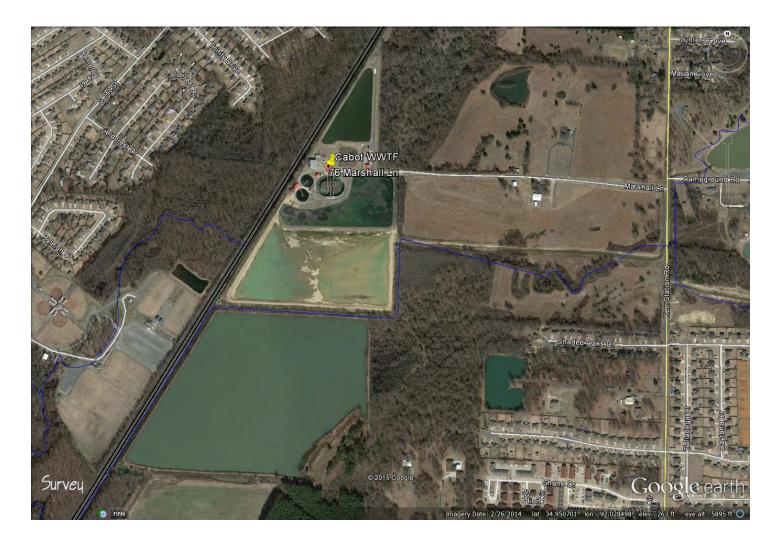


Figure 1: Google Earth Image of the facility





One City Plaza, Suite B P.O. BOX 1287 Cabot, Arkansas 72023 Phone 501 605-1740 Fax 501-605-1743

July 6, 2015

Arkansas Department of Environmental Quality Erica McAdoo, Water Division 5301 Northshore Drive Little Rock, Arkansas 72118-5317

RE: May 13, 2015 Inspection of Cabot Waterworks NPDES AR0021661.

Mrs. McAdoo,

Cabot Waterworks has corrected the following issues from your June 18, 2005 inspection report:

- 1. The effluent sampler tubing has been replaced. We will monitor for algae or debris and replace accordingly.
- 2. The automatic bulb wipers on the Effluent UV are operating in automatic mode to keep algae from building up.
- 3. Solid waste removed from treatment units and pumps has been disposed into dumpsters. Debris removed from pumps and treatment units will be disposed of promptly in the future.
- 4. We will monitor and repair erosion around all pond levies.

If you need additional information please feel free to contact me.

Sincerely

Tim D. Joyner P.E. General Manager

C_{NaterWorks}

One City Plaza, Suite B P.O. Box 1287 Cabot, Arkansas 72023 USA USA OG JUR ZONIS PORT I FOREVER

Arkansas Department of Environmental Quality Erica McAdoo,
Water Division
5301 Northshore Drive
Little Rock, Arkansas 72118-5317
72118531789



One City Plaza, Suite B P.O. BOX 1287 Cabot, Arkansas 72023 Phone 501 605-1740 Fax 501-605-1743

July 8, 2015

Arkansas Department of Environmental Quality Erica-McAdoo, Water Division 5301 Northshore Drive Little Rock, Arkansas 72118-5317

RE: Request for Reduction in WET testing frequency - Cabot Waterworks NPDES AR0021661.

Mrs. McAdoo,

Cabot Waterworks request's a reduction in WET testing frequency in accordance with our NPDES Permit. Please notify me if the full reduction in testing frequency is granted.

Sincerely

Tim D. Joyner P.E. General Manager

Permit Number: AR0021661 AFIN: 43-00059 Page 14 of Part II

- 3. any data which identifies effluent toxicity control mechanisms that will reduce effluent toxicity to the level necessary to meet no significant toxicity at the critical dilution.
- d. The permittee shall submit a Final Report on Toxicity Reduction Evaluation Activities no later than twenty-eight (28) months from confirming toxicity in the retests, which provides information pertaining to the specific control mechanism selected that will, when implemented, result in reduction of effluent toxicity to no significant toxicity at the critical dilution. The report will also provide a specific corrective action schedule for implementing the selected control mechanism.
- e. Quarterly testing during the TRE-is-a-minimum monitoring requirement. EPA recommends that permittees required to perform a TRE not rely on quarterly testing alone to ensure success in the TRE, and that additional screening tests be performed to capture toxic samples for identification of toxicants. Failure to identify the specific chemical compound causing toxicity test failure will normally result in a permit limit for whole effluent toxicity limits per federal regulations at 40 CFR 122.44(d)(1)(v).

6. MONITORING FREQUENCY REDUCTION

- a. The permittee may apply for a testing frequency reduction upon the successful completion of the first four consecutive quarters or first twelve consecutive months (in accordance with Item 1.a.) of testing for one or both test species, with no lethal or sub-lethal effects demonstrated at or below the critical dilution. (If granted, the monitoring frequency for that test species may be reduced to not less than once per year for the less sensitive species (usually the Fathead minnow) and not less than twice per year for the more sensitive test species (usually the Ceriodaphnia dubia).
- b. CERTIFICATION The permittee must certify in writing that no test failures have occurred and that all tests meet all test acceptability criteria in item 3.a. above. In addition the permittee must provide a list with each test performed including test initiation date, species, NOECs for lethal and sub-lethal effects and the maximum coefficient of variation for the controls. Upon review and acceptance of this information the agency will issue a letter of confirmation of the monitoring frequency reduction. A copy of the letter will be forwarded to the agency's Permit Compliance System section to update the permit reporting requirements.
- c. SUB-LETHAL OR SURVIVAL FAILURES If any test fails the survival or sublethal endpoint at any time during the life of this permit, three monthly retests are required and the monitoring frequency for the affected test species shall be increased to once per quarter until the permit is re-issued. Monthly retesting is not required if the permittee is performing a TRE.

CABOT

One City Plaza, Suite B P.O. Box 1287 Cabot, Arkansas 72023 LITTLE ROCK AR 722

<u> Արահրելիցի գով Սերևգրահրով վիրա վերցի հերթի իրկի հետ իսկինով </u>



Arkansas Department of Environmental Quality Erica McAdoo, Water Division 5301 Northshore Drive Little Rock, Arkansas 72118-5317

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