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November 8, 2019


Enforcement Branch, Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Re: Forest Tower Foodmart WWTP, Grant County, AR  
NPDES Permit Number AR0050113, AFIN 27-00026  
Pilot Study Results

In response to Paragraph 1 of the ORDER AND AGREEMENT section of the PROPOSED CONSENT ADMINISTRATIVE ORDER PENALTY REDUCTION document dated October 11, 2019 for the referenced facility, I submit, on behalf of Gene Graves Enterprises, LLC, the following report detailing the results of the pilot study approved on January 31, 2019:

1. The temporary changes to the Forest Tower Food Mart wastewater treatment facility that were approved on January 31, 2019 were installed in March of 2019.
2. Attached are the laboratory test results of the plant effluent for the following dates:  
April 1, 2019 (Quarterly sampling results)  
July 8, 2019 (Quarterly sampling results)  
July 22, 2019 (Ammonia only)  
August 5, 2019 (Ammonia, pH, and temperature only)  
September 9, 2019 (Ammonia, pH, temperature and TRC only)  
October 28, 2019 (Quarterly sampling results)
3. The test results show that all NPDES permit discharge limits are being met after the installation of the equipment detailed in the approved pilot study.
4. The owner of the Forest Tower Food Mart will continue the use of equipment installed as described in the pilot study and will submit a construction permit within 2 weeks of the date of this report.

Sincerely,

  
Darryl Laws, P. E.

W/ attachments

Cc: Gene Graves (by email)  
Alan McEntire (by email)

Client: Forest Tower Food Mart  
 Sample Description: NPDES Monitoring  
 Sample Location: WWTP Effluent  
 Permit Number: AR0050113  
 References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times  
 Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020  
 Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples  
 QA Frequency: Minimum of 10% Spikes and Duplicates

Sample Number: 50520-01  
 Date Reported: 5/14/2019

Sample Picked up/Grab Date/Time	Sampler	Composite Completed Date/Time	Sampler	Date/Time Lab Received:
04/01/19 11:52	Kyle Jackson			04/01/19 12:40

Parameter	Reference	Test Date/Time	Analyst	Result	Qualifiers
<b>American Interplex</b>					
Oil & Grease	EPA 1664	4/3/2019 1:26:00 PM	AI*	<5 mg/l	
<b>Basic WW</b>					
Ammonia, NH3-N	SM 4500-NH3D, 2011.	4/2/2019 9:00:00 AM	JB	<0.10 mg/l	
CBOD	SM 5210B, 2011.	4/3/2019 9:15:00 AM	JB	<2.00 mg/l	
DO	SM 4500-O, 2011.	4/1/2019 11:55:00 AM	KJ	8.7 mg/l	
Fecal Coliforms	SM 9222D, 2011.	4/1/2019 12:45:00 PM	KJ	<4 Col/100 mls	
pH	SM 4500HB, 2011.	4/1/2019 11:55:00 AM	KJ	6.3 pH Units	
Temperature	SM 2550B, 2010.	4/1/2019 11:55:00 AM	KJ	15.9 degrees C	
TSS	SM 2540 D, 2011.	4/3/2019 9:30:00 AM	JB	3.0 mg/l	

\* Quality assurance/Quality control performed in Lab.

AI\* American Interplex Laboratory performed this test.

Chain of custody, equipment calibration and maintenance records, and QA/QC information are on file at the laboratory.

*Matthew S. Bienvenu*

Matthew S. Bienvenu, Laboratory Manager

**PRELIMINARY LAB REPORT**

Client: Forest Tower Food Mart Sample Number: 51026-01  
Sample Description: NPDES Monitoring Date Reported:  
Sample Location: WWTP Effluent  
Permit Number: AR0050113  
References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times  
Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020  
Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples  
QA Frequency: Minimum of 10% Spikes and Duplicates

Sample Picked up/Grab Date/Time	Composite Completed Date/Time	Date/Time Lab Received:
07/08/19 11:42		07/08/19 12:15
Sampler	Sampler	
Kyle Jackson		

Parameter	Reference	Test Date/Time	Analyst	Result	Qualifiers
<b>American Interplex</b>					
Oil & Grease	EPA 1664		AI*	mg/l	
<b>Basic WW</b>					
Ammonia, NH3-N	SM 4500-NH3D, 2011.	7/8/2019 1:45:00 PM	KJ	0.94 mg/l	
CBOD	SM 5210B, 2011.	7/10/2019 8:30:00 AM	MB	<2.00 mg/l	
DO	SM 4500-O, 2011.	7/8/2019 11:45:00 AM	KJ	6.2 mg/l	
Fecal Coliforms	SM 9222D, 2011.	7/8/2019 12:30:00 PM	KJ	Est 20 Col/100 mls	W3
pH	SM 4500HB, 2011.	7/8/2019 11:45:00 AM	KJ	7.1 pH Units	
Temperature	SM 2550B, 2010.	7/8/2019 11:45:00 AM	KJ	29.3 degrees C	
Total Residual Chlorine	SM 4500CLG, 2011.	7/8/2019 11:48:00 AM	KJ	1.37 mg/l	
TSS	SM 2540 D, 2011.	7/11/2019 9:50:00 AM	KJ	6.0 mg/l	

\* Quality assurance/Quality control performed in Lab.

AI\* American Interplex Laboratory performed this test.

W3 - Result estimated due to the count falling not within the desired range of 20-60cfu/100mls (SM9222D)

Chain of custody, equipment calibration and maintenance records, and QA/QC information are on file at the laboratory.

Matthew S. Bienvenu, Laboratory Manager



Client: Forest Tower Food Mart  
Sample Description: NPDES Monitoring  
Sample Location: WWTP Effluent  
Permit Number: AR0050113  
References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times  
Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020  
Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples  
QA Frequency: Minimum of 10% Spikes and Duplicates

Sample Number: 51135-01  
Date Reported: 9/2/2019

Sample Picked up/Grab Date/Time	Sampler	Composite Completed Date/Time	Sampler	Date/Time Lab Received:
07/22/19 12:55	Kyle Jackson			07/22/19 13:30

Parameter	Reference	Test Date/Time	Analyst	Result	Qualifiers
<b>Basic WW</b>					
Ammonia, NH3-N	SM 4500-NH3D, 2011.	7/25/2019 12:30:00 PM	MB	0.22	

\* Quality assurance/Quality control performed in Lab.

Chain of custody, equipment calibration and maintenance records, and QA/QC information are on file at the laboratory.

*Matthew S. Bienvenu*

Matthew S. Bienvenu, Laboratory Manager

Client: Forest Tower Food Mart

Sample Number: 51219-01

Sample Description: NPDES Monitoring

Date Reported: 9/15/2019

Sample Location: WWTP Effluent

Permit Number: AR0050113

References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times  
 Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020

Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples

QA Frequency: Minimum of 10% Spikes and Duplicates

Sample Picked up/Grab

Composite Completed

Date/Time Lab Received:

Date/Time

Sampler

Date/Time

Sampler

08/05/19 12:30

08/05/19 12:03

Kyle Jackson

Parameter	Reference	Test Date/Time	Analyst	Result	Qualifiers
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**Basic WW**

Ammonia, NH3-N	SM 4500-NH3D, 2011.	8/5/2019 2:00:00 PM	KJ	<0.10 mg/l	
pH	SM 4500HB, 2011.	8/5/2019 12:05:00 PM	KJ	7.2 pH Units	
Temperature	SM 2550B, 2010.	8/5/2019 12:05:00 PM	KJ	30.1 degrees C	

\* Quality assurance/Quality control performed in Lab.

Chain of custody, equipment calibration and maintenance records, and QA/QC information are on file at the laboratory.

*Matthew S. Bienvenu*

Matthew S. Bienvenu, Laboratory Manager

Client: Forest Tower Food Mart

Sample Number: 51376-01

Sample Description: NPDES Monitoring

Date Reported: 10/20/2019

Sample Location: WWTP Effluent

Permit Number: AR0050113

References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times  
 Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020

Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples

QA Frequency: Minimum of 10% Spikes and Duplicates

Sample Picked up/Grab Date/Time	Sampler	Composite Completed Date/Time	Sampler	Date/Time Lab Received:
09/09/19 11:40	Kyle Jackson			09/09/19 12:10

Parameter	Reference	Test Date/Time	Analyst	Result	Qualifiers
<b>Basic WW</b>					
Ammonia, NH3-N	SM 4500-NH3D, 2011.	9/13/2019 7:00:00 AM	KJ	<0.10 mg/l	
pH	SM 4500HB, 2011.	9/9/2019 11:41:00 AM	KJ	7.4 pH Units	
Temperature	SM 2550B, 2010.	9/9/2019 11:42:00 AM	KJ	30.7 degrees C	
<b>Total Residual Chlorine</b>					
TRC	SM 4500CLG, 2011.	9/9/2019 11:40:00 AM	KJ	2.04 mg/l	

\* Quality assurance/Quality control performed in Lab.

Chain of custody, equipment calibration and maintenance records, and QA/QC information are on file at the laboratory.

*Matthew S. Bienvenu*

Matthew S. Bienvenu, Laboratory Manager



Client: Forest Tower Food Mart  
 Sample Description: NPDES Monitoring  
 Sample Location: WWTP Effluent  
 Permit Number: AR0050113  
 References: 40 CFR Part 136 Approved Methods, Containers, Preservation, Holding Times  
 Standard Methods for the Examination of Water and Wastewater: EPA-600/4-79-020  
 Quality Control: Blank, duplication, known addition, quarterly analysis of external references samples  
 QA Frequency: Minimum of 10% Spikes and Duplicates

Sample Number: 51549-01  
 Date Reported: 11/7/2019

Sample Picked up/Grab Date/Time: 10/28/19 12:25  
 Sampler: Kyle Jackson  
 Composite Completed Date/Time: 10/28/19 14:00  
 Sampler: [Blank]  
 Date/Time Lab Received: 10/28/19 14:00

Parameter	Reference	Test Date/Time	Analyst	Result	Qualifiers
<b>American Interplex</b>					
Oil & Grease	EPA 1664	11/6/2019 5:23:00 PM	AI*	<5 mg/l	
<b>Basic WW</b>					
Ammonia, NH3-N	SM 4500-NH3D, 2011.	11/1/2019 11:30:00 AM	KJ	<0.10 mg/l	
CBOD	SM 5210B, 2011.	10/30/2019 8:45:00 AM	MB	<2.00 mg/l	
DO	SM 4500-O, 2011.	10/28/2019 12:27:00 PM	KJ	6.9 mg/l	
Fecal Coliforms	SM 9222D, 2011.	10/28/2019 2:05:00 PM	KJ	Est 10 Col/100 mls	W3
pH	SM 4500HB, 2011.	10/28/2019 12:27:00 PM	KJ	7.0 pH Units	
Temperature	SM 2550B, 2010.	10/28/2019 12:27:00 PM	KJ	18.9 degrees C	
Total Residual Chlorine	SM 4500CLG, 2011.	10/28/2019 12:30:00 PM	KJ	4.20 mg/l	
TSS	SM 2540 D, 2011.	10/29/2019 12:45:00 PM	MB	3.0 mg/l	

\* Quality assurance/Quality control performed in Lab.

AI\* American Interplex Laboratory performed this test.

W3 - Result is estimated due to the count falling not within the desired range of 20-60cfu/100mls (SM9222D)

Chain of custody, equipment calibration and maintenance records, and QA/QC information are on file at the laboratory.

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