

January 21, 2021

Christina Brown, Enforcement Analyst
ADEQ
5301 North Shore Drive
North Little Rock, AR 72118-5317

RE: Pine Bluff Wastewater Utility (AR0033316) Quarterly Biomonitoring Noncompliance Report

Dear Ms. Brown :

During the month of October 18, 2020, Pine Bluff Wastewater Utility sent Waypoint Analytical samples for our Quarterly biomonitoring. Waypoint Analytical is in Memphis, Tennessee so we ship our samples via Federal Express. We shipped two samples for analysis successfully and the third sample failed to deliver in a timely manner (fault of Federal Express). The WET (Whole Effluent Toxicity) test could not be used to make regulatory determinations and unacceptable for effluent characterization or compliance monitoring. The WET test is invalid due to lack of sample for the 3rd composite. Therefore, the test could not be renewed and was terminated October 24, 2020. A retest was scheduled.

November 08, 2020, Pine Bluff Wastewater Utility sent Waypoint Analytical samples again for our quarterly biomonitoring. We discussed the importance of Waypoint Analytical working to ensure that deliverance of our sample is ensured via Federal Express. Once again, two samples were received successfully and the third sample failed to be delivered in a timely manner (fault of Federal Express). I was informed that the WET test is invalid due to lack of sample for the third composite. Therefore, the test could not be renewed and was terminated November 14, 2020. This time, we did not schedule a retest with Waypoint Analytical.

Finally, it was decided to ship our samples to American Interplex December 13, 2020. This decision was made due to Waypoint Analytical laboratory 's failure to receive our third composite sample to complete the analysis as required. Since American Interplex is in Little Rock, Arkansas, we personally delivered our samples to their laboratory. Unfortunately, I received noticed from the laboratory that this sample was invalid for the C. dubia and will need to be repeated. According to the laboratory representative, the minnows test was valid and passing.

We do not anticipate this violation to reoccur. We are working with our contract laboratory to correct this error. We will take whatever steps necessary to ensure that samples are shipped and delivered as expected. Arrangements to perform biomonitoring for the quarters are scheduled.

If there should be any other information required of us, please contact me at (870)-535-6603.

Sincerely,

Environmental Compliance Supervisor