

City of Hope

P. O. Box 667 • Hope, Arkansas 71802-0667 • (870) 777-6701 • Fax (870) 722-2579

February 8, 2023

Arkansas Department of Energy and Environment
Attn: Leslie Allen-Daniel – Enforcement Coordinator
5301 Northside Drive
North Little Rock, AR 72118

Re: City of Hope – Bois D’Arc (West Plant) AFIN: 29-00034; NPDES Permit No.: AR0038466

Ms. Leslie Allen Daniel,

You recently contacted the City of Hope regarding our certification of compliance for the final effluent limits for the sub-lethal WET limits: Total Recoverable Copper and Total Recoverable Mercury, submitted by the City of Hope (AR0038466). As you know we originally submitted monthly DMR reports during the calendar year of 2022. Upon receiving your email of concern related to Copper and Mercury limits, we reviewed the reports for accuracy.

Initially we discovered that with respect to our Mercury numbers, we failed to properly convert the analytic data provided in nanograms from our vender Arkansas Analytical to micrograms required by your report. For example, our December 2022 report from Arkansas Analytical indicated the presence of mercury at 4.69 ng/l. This was placed on our December DMR as 4.7 µg/l. The correct conversion should have been .0047 µg/l causing us to report “0” on our DMR. Upon discovering this error, Superintendent Ross corrected our Mercury numbers on our DMR’s for January 2022- January 2023.

A few days later, we discovered a second error with respect to Copper. Arkansas Analytics provides copper information to us in micrograms per liter. However, the DMR requests additional information with respect to copper in mass pounds per day. Our original formula used to compute mass lbs./day was in error at: $(\mu\text{g}/\text{l}) \times \text{MGD} \times 8.34$. This formula was corrected to:

$$1. \{(\mu\text{g}/\text{l}) / 1000\} \times \text{MGD} \times 8.34$$

For example, our December 2022 report from Arkansas Analytical indicated the presence of copper at 8.66 µg/l. The appropriate conversion for mass lbs./day using a .667 MGD (for example only) would be:

$$(8.66/1000 \times \text{MGD (Est .667 used here)}) \times 8.34 = .048 \text{ or } 0 \text{ by ADEQ reporting rule.}$$

Upon discovering this error, Superintendent Ross corrected our DMR's a second time for January 2022-
January 2023 with corrected mass lbs./day data.

All reports have been corrected and resubmitted. As you can see, the City of Hope is actually within all
standard required permit limits. We are sorry for this confusion. Please accept our apology.

If you have additional questions, please feel to contact JR Wilson City Manager, at 870-777-
6701 or Scott Ross, Wastewater Superintendent at 870-796-0891.

Sincerely,



Scott Ross

Wastewater Superintendent

City of Hope AR