

ADEQ

ARKANSAS
Department of Environmental Quality

October 18, 2018

Kathryn Yeager, Wastewater Manager
City of Harrison
P.O. Box 1715
Harrison, AR 72601

RE: City of Harrison WWTP Inspections (Boone Co)
AFIN: 05-00054 **NPDES Permit No.: AR0034321**

Dear Ms. Yeager:

On September 10, 2018, I performed a Pretreatment Compliance 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 e-mailed 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 **November 2, 2018**.

If I can be of any assistance, please contact me at beck@adeq.state.ar.us or (479) 968-7339 extension 16.

Sincerely,



Amy Beck
District 5 Field Inspector
Office of Water Quality



AR K A N S A S
Department of Environmental Quality

WATER DIVISION INSPECTION REPORT

AFIN: 05-00054	PERMIT #: AR0034321	DATE: 9/10/2018
COUNTY: 05 Boone	PDS #: 104985	MEDIA: WN
GPS LAT: 36.240879 LONG: -93.080843 LOCATION: Entrance		

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: City of Harrison WWTP LOCATION: 1508 Silver Valley Road CITY: Harrison	FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 36537 S - State FACILITY EVALUATION RATING: 2 - Marginal INSPECTION TYPE: Pretreatment Compliance
	DATE(S): 9/10/2018 ENTRY TIME: 10:00 EXIT TIME: 15:15 PERMIT EFFECTIVE DATE: 10/1/2007 PERMIT EXPIRATION DATE: 9/30/2012
RESPONSIBLE OFFICIAL	
NAME / TITLE: Kathryn Yeager / Wastewater Manager COMPANY: City of Harrison MAILING ADDRESS: P.O. Box 1715 CITY, STATE, ZIP: Harrison AR 72601 PHONE & EXT. / FAX: 870-741-5527 / 870-741-5022 EMAIL: kathryn.yeager@cityofharrison.com	FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N
CONTACTED DURING INSPECTION: No	INSPECTION PARTICIPANTS
	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Randy Reese, City of Harrison Pretreatment Coordinator, randy.reese@cityofharrison.com; Skyler Schlick, ADEQ Inspector, SchlickS@adeq.state.ar.us;

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

** PERMIT	** FLOW MEASUREMENT	** STORMWATER
** RECORDS/REPORTS	** LABORATORY	** FACILITY SITE REVIEW
** OPERATION & MAINTENANCE	** EFFLUENT/RECEIVING WATER	** SELF-MONITORING PROGRAM
** SAMPLING	** SLUDGE HANDLING/DISPOSAL	M PRETREATMENT
** OTHER:		


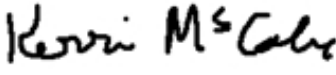
SUMMARY OF FINDINGS

1. This inspection reveals Claridge Extrusions, one of the POTW permitted facilities, is not performing TTO testing required by the IU permit. It is the POTW's responsibility to review Industrial Users' (IU) monitoring reports (see 40 CFR 403.8). Part III 8. a. (3) of your permit requires the POTW to address IU non-compliance.
2. Influent and effluent are not tested once annually for the presence of toxic pollutants listed in 40 CFR 122 Appendix D. Table II. This test is required by Part III 8. c. of your permit. The test results must be submitted with your annual report as stated in Part III 8. d. (4) of your permit.
3. The inspection reveals biosolids are tested annually. Part 9. b. (1) ii of the permit requires biosolids to be tested quarterly for the parameters listed in the same section.

GENERAL COMMENTS

I inspected City of Harrison's pretreatment program on September 10, 2018 with the persons listed above. Inspection consisted of program overview, records review, and three Industrial User (IU) field assessments.

Mr. Reese became the city's Pretreatment Coordinator in February and is still learning the program and requirements. The POTW has four permitted IU: Claridge Products, Claridge Extrusions, Anchor Die Cast, and Pace Industries. However, Claridge Products is not currently discharging to the POTW. The facility works closely with the permitted IU to protect the WWTP and ensure compliance with the pretreatment program. Records of inspections and monitoring are complete and documented with the exception of Claridge Extrusion noted above. Records are organized and easily accessible. The city has determined in the January 2017 Program that Technically Based Local Limits (TBLL) are not necessary per 40 CFR 403.8 f. (4). The program stated the need for TBLL will be evaluated once every five years. The WWTP has not experienced pass through or interference from their IU.

INSPECTOR'S SIGNATURE:  Amy Beck	DATE: 9/24/2018
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 10/18/2018

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Harrison

AFIN Number: 05-00054

NPDES Permit Number(s): AR0034321

Program Tracked under NPDES Permit Number: AR0034321

Fact Sheet Preparation Date: _____

Date of Last PCI/Audit: Audit – July 2015

Date of Last Annual Report: April 24, 2018

Name of Inspector: Amy Beck

Date PCI Performed: September 10, 2018

Name, Title, and Telephone Number of Facility Representative:
Randy Reese, City of Harrison Pretreatment Coordinator
(870)741-4426; randy.reese@cityofharrison.com

Name and Title of Other Participants: Skylar Schlick, ADEQ
Inspector;

Number of IUs Visited: 3

Name(s) of IUs Visited: Claridge Extrusion, Anchor Die Cast,
Pace Industries

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. **No change. Claridge Products does not discharge at this time, but is keeping permit active.**
2. Has ADEQ or EPA been notified of these changes? **N/A**
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** **Yes**
4. What procedures are being used to update the IU Survey? **IU survey is sent to all industries every 5 years. Survey is sent to any new industry in town. Last survey was complete in 2017.**
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) **4**
6. Number of Categorical Industrial Users: **4**
7. How does the POTW determine the appropriate categorical standards to apply to an IU? **National categorical pretreatment standards established under 40 CFR 403.5.**
8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Claridge Extrusions	Aluminum Forming	Extrusion/anodizing/phosphate rinse
Claridge Products	Porcelain Enameling	
Anchor Die Cast	Electroplating, Metal Finishing, Metal Molding and Casting	Zinc plating, Aluminum die cast
Pace Industries	Metal Molding and Casting	Aluminum die cast

B. LOCAL LIMITS

1. **IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? No; local limits were determined to be unnecessary at last program update in 2017. Program states local limits will be reevaluated at least every 5 years.**

2. Describe any apparent problems with the local limits.
N/A

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in Permit:	Requirement in Program:	Comments:
Metals:				
Influent:	Quarterly	Quarterly	Quarterly	
Effluent:	Quarterly	Quarterly	Quarterly	
Sludge:	Annually	Quarterly	Annually	
Organics:				
Influent:	No record	Annually		
Effluent:	No record	Annually		
Sludge:	Annually	Quarterly		

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
No upsets or inhibitions since Mr. Reese took Pretreatment Coordinator position in February 2017.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes; permit
2. How many IU permits (or other control documents) have been issued? 4
3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT. All SIU have current permits.**
-
4. Does the control document contain the following items?
- An expiration date: Yes
- Discharge limitations: Yes
- If the program requires self-monitoring by the IUs, do the Permits contain:
- IU self-monitoring requirements: Yes
- IU reporting requirements: Yes
5. Indicate which of the following recommended standard conditions are contained in the control documents:
- Sample location: Yes
- Type of sample: Yes
- Monitoring frequency: Yes
- Bypass prohibition: Yes
- Right of entry: Yes
- Non-transferability: Yes
- Revocation clause: Yes
- Penalty Provisions: Yes
- Slug load notification: Yes
- Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>Annually</u>	<u>Annually</u>
other SIUs	<u>N/A</u>	<u>N/A</u>
Inspection:		
categorical IUs	<u>Annually</u>	<u>Annually</u>
other SIUs	<u>N/A</u>	<u>N/A</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes

3. Are inspections announced or unannounced? Unannounced

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: Yes

Observation of IU self-monitoring procedures: Yes

Verification that approved analytical techniques are used: Yes

Verification of IU flow measurement (where required): Yes

6. Overall adequacy of inspection documentation: Adequate

7. **DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN**

THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).

Yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? **Yes (reviewed POTW sample of Pace Industries for July 2018)**

9. Are sampling and flow monitoring equipment properly maintained? **Not evaluated**

10. Is the POTW keeping proper field notes and chain of custody forms? **Yes**

11. Is the sampling location representative of the discharge to the collection system? **Yes**

12. Are sampling locations identified in POTW records? **Yes**

13. Are sampling services available in an emergency? **Yes**

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? **Mr. Reese keeps all IU reports in individual binders. Due to low number of permitted IU, this is effective for maintaining records.**

15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?** **Yes**

16. **IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?** **Facility must address Claridge Extrusion TTO monitoring.**

17. What are the POTW's procedures for following up violations?
Notice of violation to IU.

18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?:** N/A. No recent industry permitted. No BMR review required.

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: _____

Other environmental permits held: _____

Description of operations: _____

Process flow diagrams: _____

Flow measurements: _____

Measurements of regulated pollutants: _____

Certification of compliance by the IU: _____

Compliance schedule (if needed): _____

19. Additional comments on the POTW's inspection and sampling procedures:

5. Comments on the POTW's enforcement procedures:
POTW must stay vigilant to ensure industries are self-monitoring all required parameters of the permit.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program?
Yes
2. Are staffing levels adequate? **Yes**
3. Are the responsible officials familiar with the approved program? **Yes, Mr. Reese is still learning the program.**

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
None
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area?
3. Does the POTW have copies of permits for IUs in other cities?
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators?
5. Comments on multijurisdictional issues:

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Claridge Extrusion

POTW Name: Harrison

Industry Contacts: Jake Mattix, Maintenance Manager; Andrew Coker, Operator

Date and Time of Visit: September 10, 2018 @ 1340

Description of Manufacturing Process:
Facility extrudes, fabricates, paints, and anodizes various aluminum parts.

Sources of Process Wastewater:
Anodizing process

Categorical Industry? Yes

Basis for Limits: Categorical

Point of Application: Outfall to POTW

Description of Pretreatment Equipment and Procedures:
pH adjustment, addition of polymer, clarifier, sludge tanks, filter press

Spill Prevention and Solvent Management Procedures:
Spill kits

Sampling Location and Equipment:
Samples are taken at outfall/manhole. Facility has a pH meter. All other parameters are analyzed via contract lab.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Pace Industries**

POTW Name: **Harrison**

Industry Contacts: **Mark Maddox**

Date and Time of Visit: **September 10, 2018 @ 1415**

Description of Manufacturing Process:
 Facility produces custom aluminum die casting for BBQ grill and outdoor lighting.

Sources of Process Wastewater:
 Die cast quench, washing parts

Categorical Industry? **Yes**

Basis for Limits: **Categorical**

Point of Application: **Outfall to POTW**

Description of Pretreatment Equipment and Procedures:
 Add coagulant, pH adjustment, DAF unit, solids to sludge press.

Spill Prevention and Solvent Management Procedures:
 SPCC plan and spill kits

Sampling Location and Equipment:
 ISCO composite sampler set up after treatment processes; pH meter

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Anchor Die Cast

POTW Name: Harrison

Industry Contacts: Todd Allen, Pretreatment Operator; Scott Lusk, Plant Manager

Date and Time of Visit: September 10, 2018 @ 1300

Description of Manufacturing Process:
Facility produces and paints aluminum and galvanized steel hardware for chain link fence.

Sources of Process Wastewater:
Powder coat paint process

Categorical Industry? Yes

Basis for Limits: Categorical

Point of Application: Outfall to POTW

Description of Pretreatment Equipment and Procedures:
Holding tank, pH adjust, add polymer, clarifier, sludge press

Spill Prevention and Solvent Management Procedures:
SPCCC

Sampling Location and Equipment:
Samples taken at box culvert after treatment; pH meter

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Amy Beck</u>	
NAME OF FACILITY:	<u>City of Harrison</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0034321</u>	NPID
DATE OF PCI:	<u>September 10, 2018</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>4</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>4</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSN C
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN

From: [Kathryn Catlin](#)
To: [Water-Inspection-Report; Beck, Amy](#)
Cc: [Randy Reese](#)
Subject: Revised City of Harrison Pretreatment Compliance Inspection Response
Date: Thursday, October 25, 2018 7:55:00 AM
Attachments: [Inspection Response.pdf](#)
[Revised Attachment A.pdf](#)
[Attachment B.pdf](#)

Please disregard the previously submitted response to the City of Harrison's Pretreatment Compliance Inspection conducted on October 10, 2018. The initial response from the City of Harrison included an Attachment A that contained analytical results for 2018 rather than 2017 as stated in the written response. Attached find the revised response with the correct Attachment A. If you have any questions or require any additional information, please feel free to contact me. Thank you and I apologize for the confusion.



Kathryn Catlin, MBA

Wastewater Systems Manager

PO Box 1715

Harrison, AR 72602

870-741-5527

Kathryn.catlin@cityofharrison.com

10/25/2018

Amy Beck

Atten: Water Division Inspection Branch

ADEQ – Water Division

5301 Northshore Drive

North Little Rock, AR 72118-5317

Wastewater Department

Kathryn Catlin

Wastewater Systems Manager

1508 Silver Valley Road

Harrison, Arkansas 72601

Office: 870.741.5527

Fax: 870.741.0318

www.cityofharrison.com

kathryn.catlin@cityofharrison.com

RE: City of Harrison WWTP Inspection (Boone Co)
AFIN: 05-00054 Permit No.: AR0034321

Dear Ms. Beck:

The following is in response to your report on the Pretreatment Compliance Inspection conducted on September 10, 2018:

Item 1 – Claridge Extrusions was issued a Notice of Non-compliance on October 19, 2018 for non-compliance with the TTO analytical requirements of IU Permit No. 001-15. Claridge Extrusions collected and sent a sample for TTO analysis on October 24, 2018. Moving forward, a checklist has been created for each of the permitted industry to ensure that all IU permit requirements are being met.

Item 2 – Influent and Effluent Table II pollutants have been analyzed annually (Attachment A for 2017) but the analytical results were inadvertently not included in the 2017 Annual Pretreatment Summary submitted to ADEQ. The revised summary, with the Table II analytical results, was submitted by the City on October 23, 2018.

Item 3 – When the City of Harrison submitted a permit renewal application for NPDES Permit AR0034321 in 2012, we requested a separate land application permit for our biosolids program that included a land management plan. ARL034321, Permit No.: 5158-W went into effect December 1, 2012. Per Part I Table I of the permit, biosolids analysis is required once annually prior to the 1st application of the calendar year (Attachment B). Permit 5158-W was renewed December 1, 2017 with the same annual biosolids analysis requirement. Per my discussions with ADEQ and EPA upon receiving the initial ARL034321, 5158-W permit; the newly issued land application permit requirements supersede the expired NPDES permit AR034321 requirements for biosolids analysis.

If you have any questions or require any additional information, please feel free to contact me at 870-741-5527 or Kathryn.catlin@cityofharrison.com.

Sincerely,



Kathryn Catlin

Wastewater Systems Manager

1/26/2017

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison, AR, 72601

Ref: Analytical Testing
Lab Report Number: 17-024-0244
Client Project Description: INF Annual Tbl II & Quarterly Tbl III
EFF PPS Annual Tbl II Quarterly Tbl III

Dear Ms. Kathryn Catlin:
Waypoint Analytical, Inc. received sample(s) on 1/24/2017 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

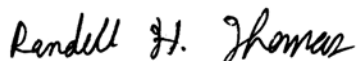
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2012) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Randy Thomas
Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.

Alabama #40750	Louisiana #04015	VA NELAP #460181	Texas #T104704180-11-6	Arkansas #88-0650
Mississippi	California #2904	NC #415	Oklahoma #9311	Virginia #00106
Kentucky #90047	Tennessee #TN02027	EPA #TN00012	Kentucky UST #41	



Client: Harrison Wastewater Treatment Plant
Project: INF Annual Tbl II & Quarterly Tbl III
Lab Report Number: 17-024-0244
Date: 1/26/2017

CASE NARRATIVE

Volatile Organic Compounds - GC/MS Method EPA-624

Sample 91742 (Effluent Grab)

QC Batch No: L319353

Surrogate(s) exhibited a high bias in this project sample where no target analytes were detected. The high recovery(s) had no impact on the data. Batch QC samples (method blank and laboratory control samples) all showed surrogates within QC limits.

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/26/2017
Received : 1/24/2017

Report Number : **17-024-0244**

REPORT OF ANALYSIS

Lab No : **91741**

Matrix: **Aqueous**

Sample ID : **Influent Grab**

Sampled: **1/23/2017 12:00**

Analytical Method: 624 **Prep Batch(es):** **L319350** 01/25/17 08:55

Prep Method: EPA-624 (PREP)

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
Acrolein	<20.0	µg/L	20.0	1	01/25/17 18:21	LAT	L319353
Acrylonitrile	<20.0	µg/L	20.0	1	01/25/17 18:21	LAT	L319353
Benzene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Bromoform	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Carbon Tetrachloride	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Chlorobenzene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Chlorodibromomethane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Chloroethane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
2-Chloroethylvinyl Ether	<5.00	µg/L	5.00	1	01/25/17 18:21	LAT	L319353
Chloroform	2.14	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Dichlorobromomethane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
1,1-Dichloroethane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
1,2-Dichloroethane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
1,1-Dichloroethylene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
1,2-Dichloropropane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
1,3-Dichloropropylene, Total	<1.00	µg/L	1.00	1	01/25/17 18:21		L319353
Ethylbenzene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Methyl Bromide	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Methyl Chloride	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Methylene Chloride	<10.0	µg/L	10.0	1	01/25/17 18:21	LAT	L319353
1,1,2,2-Tetrachloroethane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Tetrachloroethylene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353

**Qualifiers/
Definitions**

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/26/2017
Received : 1/24/2017

Report Number : **17-024-0244**

REPORT OF ANALYSIS

Lab No : **91741**

Matrix: **Aqueous**

Sample ID : **Influent Grab**

Sampled: **1/23/2017 12:00**

Analytical Method: 624 **Prep Batch(es):** **L319350** 01/25/17 08:55

Prep Method: EPA-624 (PREP)

Test	Results	Units	MLQ	DF	Date / Time Analyzed	By	Analytical Batch
Toluene	<5.00	µg/L	5.00	1	01/25/17 18:21	LAT	L319353
1,2-trans-Dichloroethylene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
1,1,1-Trichloroethane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
1,1,2-Trichloroethane	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Trichloroethylene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Vinyl Chloride	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
cis-1,3-Dichloropropene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
trans-1,3-Dichloropropene	<1.00	µg/L	1.00	1	01/25/17 18:21	LAT	L319353
Surrogate: 4-Bromofluorobenzene	122		Limits: 71-131%	1	01/25/17 18:21	LAT	L319353
Surrogate: Dibromofluoromethane	90.2		Limits: 70-128%	1	01/25/17 18:21	LAT	L319353
Surrogate: 1,2-Dichloroethane - d4	102		Limits: 67-136%	1	01/25/17 18:21	LAT	L319353
Surrogate: Toluene-d8	86.4		Limits: 70-130%	1	01/25/17 18:21	LAT	L319353

**Qualifiers/
Definitions**

* Outside QC limit
MLQ Method Quantitation Limit

DF Dilution Factor

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/26/2017
Received : 1/24/2017

Report Number : **17-024-0244**

REPORT OF ANALYSIS

Lab No : **91742**

Matrix: **Aqueous**

Sample ID : **Effluent Grab**

Sampled: **1/23/2017 12:10**

Analytical Method: 624 **Prep Batch(es):** **L319350** 01/25/17 08:55

Prep Method: EPA-624 (PREP)

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
Toluene	<5.00	µg/L	5.00	1	01/25/17 19:03	LAT	L319353
1,2-trans-Dichloroethylene	<1.00	µg/L	1.00	1	01/25/17 19:03	LAT	L319353
1,1,1-Trichloroethane	<1.00	µg/L	1.00	1	01/25/17 19:03	LAT	L319353
1,1,2-Trichloroethane	<1.00	µg/L	1.00	1	01/25/17 19:03	LAT	L319353
Trichloroethylene	<1.00	µg/L	1.00	1	01/25/17 19:03	LAT	L319353
Vinyl Chloride	<1.00	µg/L	1.00	1	01/25/17 19:03	LAT	L319353
cis-1,3-Dichloropropene	<1.00	µg/L	1.00	1	01/25/17 19:03	LAT	L319353
trans-1,3-Dichloropropene	<1.00	µg/L	1.00	1	01/25/17 19:03	LAT	L319353
Surrogate: 4-Bromofluorobenzene	136 *		Limits: 71-131%	1	01/25/17 19:03	LAT	L319353
Surrogate: Dibromofluoromethane	93.2		Limits: 70-128%	1	01/25/17 19:03	LAT	L319353
Surrogate: 1,2-Dichloroethane - d4	101		Limits: 67-136%	1	01/25/17 19:03	LAT	L319353
Surrogate: Toluene-d8	89.0		Limits: 70-130%	1	01/25/17 19:03	LAT	L319353

**Qualifiers/
Definitions**

* Outside QC limit
DF Dilution Factor
ML Method Quantitation Limit

Cooler Receipt Form

Customer Number: **03322**

Customer Name: **Harrison Wastewater Treatment Plant**

Report Number: **17-024-0244**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID: #10

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers received	<input type="text" value="1"/>		
Custody seals intact on shipping container/cooler?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> Not Required
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC properly completed	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Water - VOA vials free of headspace	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Trip Blanks received with VOAs	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input type="checkbox"/> High concentration container (48 hr)		<input type="checkbox"/> Low concentration EnCore samplers (48 hr)	
<input type="checkbox"/> High concentration pre-weighed (methanol -14 d)		<input type="checkbox"/> Low conc pre-weighed vials (Sod Bis -14 d)	
Special precautions or instructions included?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature:

Date & Time:



CHAIN-OF-CUSTODY

Kit ID: 0000075793
Initiated By: Danyale Hill
Project Comment Do not send Quarterly kit when sending this Annual kit.

Company Name Harrison Wastewater Treatment Plant	Company Number 03322	Client Project Manager/Contact Mr. Tim Holt	Purchase Order Number
Site Name Annual PPS & INF/EFF Tbl. II & III	Project Number	<input type="checkbox"/> RUSH – Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed	Method of Shipment <input type="checkbox"/> Fed Ex <input checked="" type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other
LIMS Project ID Harrison Annual Inf/Eff	Project Manager Phone # (870) 741-5527	Project Manager Email hwwtp2@windstream.net	Site/Facility ID #

Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
1-23-17	12:00 pm	Influent	Aqueous	G	2	Glass Vial Amber - 40ml	HCL - Hydrochloric Acid	VOC
1-23-17	12:10 pm	Effluent	Aqueous	G	2	Glass Vial Amber - 40ml	HCL - Hydrochloric Acid	VOC

For Laboratory Use Only			Sampled by (Name - Print)	Client Remarks/Comments				
Ice Y/N	Custody Seals Y/N	Lab Comments	Randy Reese	Date	Time	Received by: (SIGNATURE)	Date	Time
			Randy Reese	1-23-17	12:00 pm			
Blank/ Cooler Temp 1.9°C 116								

1016

1/27/2017

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison, AR, 72601

Ref: Analytical Testing
Lab Report Number: 17-018-0219
Client Project Description: INF Annual Tbl II & Quarterly Tbl III
EFF PPS Annual Tbl II Quarterly Tbl III

Dear Ms. Kathryn Catlin:
Waypoint Analytical, Inc. received sample(s) on 1/18/2017 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

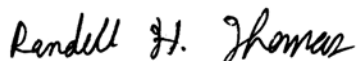
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2012) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Randy Thomas
Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.

Alabama #40750	Louisiana #04015	VA NELAP #460181	Texas #T104704180-11-6	Arkansas #88-0650
Mississippi	California #2904	NC #415	Oklahoma #9311	Virginia #00106
Kentucky #90047	Tennessee #TN02027	EPA #TN00012	Kentucky UST #41	



Client: Harrison Wastewater Treatment Plant
Project: INF Annual Tbl II & Quarterly Tbl III
Lab Report Number: 17-018-0219
Date: 1/27/2017

CASE NARRATIVE

Organochlorine Pesticides Method EPA-608 (FV1)

Sample 90723 (Effluent Composite 1/16-17/17)

Analyte: Chlorpyrifos

QC Batch No: L319201

Analyte was detected in both the primary and confirmatory analyses, with a relative percent difference (RPD) of greater than 40% between the two results. These results are flagged Q and the lower of the two values is reported. Analytes with RPD values greater than 100% are reported as non-detect. RPD is 43.1%.

Semivolatile Organic Compounds - GC/MS Method EPA-625

Sample 90721 (Influent Composite 1/16-17/17)

QC Batch No: L319010

Surrogates were flagged for recoveries in the associated project sample. During the extraction step, the extraction technician noted that a significant emulsion formed. Batch QC samples (Method Blank and Laboratory Control Samples) all showed surrogate recoveries within QC limits, indicating that the low recoveries were due to the sample matrix.

Sample Summary Table

Report Number: 17-018-0219
Client Project Description: INF Annual Tbl II & Quarterly Tbl III
EFF PPS Annual Tbl II Quarterly Tbl III

Lab No	Client Sample ID	Matrix	Date Collected	Date Received	Method	Lab ID
90720	Influent Grab	Aqueous	01/17/2017 12:00	01/18/2017	420.1	WTN
90720	Influent Grab	Aqueous	01/17/2017 12:00	01/18/2017	4500CNE-2011	WTN
90721	Influent Composite 1/16-17/17	Aqueous	01/17/2017 11:45	01/18/2017	1631E	WMS
90721	Influent Composite 1/16-17/17	Aqueous	01/17/2017 11:45	01/18/2017	625	WTN
90721	Influent Composite 1/16-17/17	Aqueous	01/17/2017 11:45	01/18/2017	EPA-200.8	WTN
90722	Effluent Grab	Aqueous	01/17/2017 12:15	01/18/2017	420.1	WTN
90722	Effluent Grab	Aqueous	01/17/2017 12:15	01/18/2017	4500CNE-2011	WTN
90723	Effluent Composite 1/16-17/17	Aqueous	01/17/2017 12:00	01/18/2017	1631E	WMS
90723	Effluent Composite 1/16-17/17	Aqueous	01/17/2017 12:00	01/18/2017	3500CrB-2011	WTN
90723	Effluent Composite 1/16-17/17	Aqueous	01/17/2017 12:00	01/18/2017	608	WTN
90723	Effluent Composite 1/16-17/17	Aqueous	01/17/2017 12:00	01/18/2017	625	WTN
90723	Effluent Composite 1/16-17/17	Aqueous	01/17/2017 12:00	01/18/2017	625 Screen	WTN
90723	Effluent Composite 1/16-17/17	Aqueous	01/17/2017 12:00	01/18/2017	EPA-200.8	WTN
90723	Effluent Composite 1/16-17/17	Aqueous	01/17/2017 12:00	01/18/2017	EPA-608 (PCB)	WTN
90724	Field Blank	Aqueous	01/17/2017 12:15	01/18/2017	1631E	WMS

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/27/2017
Received : 1/18/2017

Report Number : **17-018-0219**

REPORT OF ANALYSIS

Lab No : **90720**

Matrix: **Aqueous**

Sample ID : **Influent Grab**

Sampled: **1/17/2017 12:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Phenols (Total)	38.40	µg/L	5.000	1	01/24/17 12:30	CLP	420.1
Cyanide, Total	<5.00	µg/L	5.00	1	01/23/17 12:51	EWB	4500CNE-2011

**Qualifiers/
Definitions**

*	Outside QC limit	DF	Dilution Factor
MQL	Method Quantitation Limit	Q	RPD >40% dual column results

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/27/2017
Received : 1/18/2017

Report Number : **17-018-0219**

REPORT OF ANALYSIS

Lab No : **90721**

Matrix: **Aqueous**

Sample ID : **Influent Composite 1/16-17/17**

Sampled: **1/17/2017 11:45**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Antimony	4.56	µg/L	1.00	1	01/19/17 15:32	BKN	EPA-200.8
Total Arsenic	<0.500	µg/L	0.500	1	01/19/17 15:32	BKN	EPA-200.8
Total Beryllium	<0.500	µg/L	0.500	1	01/19/17 15:32	BKN	EPA-200.8
Total Cadmium	0.137	µg/L	0.100	1	01/19/17 15:32	BKN	EPA-200.8
Total Chromium	8.11	µg/L	1.00	1	01/19/17 15:32	BKN	EPA-200.8
Total Copper	39.8	µg/L	0.500	1	01/19/17 15:32	BKN	EPA-200.8
Total Lead	2.36	µg/L	0.500	1	01/19/17 15:32	BKN	EPA-200.8
Mercury (Total)	99.5	ng/L	2.50	1	01/26/17 18:55	BTH	1631E
Total Nickel	11.4	µg/L	0.500	1	01/19/17 15:32	BKN	EPA-200.8
Total Selenium	<1.00	µg/L	1.00	1	01/19/17 15:32	BKN	EPA-200.8
Total Silver	0.729	µg/L	0.100	1	01/19/17 15:32	BKN	EPA-200.8
Total Thallium	<0.100	µg/L	0.100	1	01/19/17 15:32	BKN	EPA-200.8
Total Zinc	127	µg/L	5.00	1	01/19/17 15:32	BKN	EPA-200.8
Total Molybdenum	3.67	µg/L	1.00	1	01/19/17 15:32	BKN	EPA-200.8

Analytical Method: 625

Prep Batch(es): **L318945** 01/01/00 00:00

Prep Method: 625

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
2-Chlorophenol	<5.00	µg/L	5.00	1	01/23/17 19:08	RQE	L319010
2,4-Dichlorophenol	<5.00	µg/L	5.00	1	01/23/17 19:08	RQE	L319010
2,4-Dimethylphenol	<5.00	µg/L	5.00	1	01/23/17 19:08	RQE	L319010
4,6-Dinitro-o-cresol	<10.0	µg/L	10.0	1	01/23/17 19:08	RQE	L319010

**Qualifiers/
Definitions**

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor
Q RPD >40% dual column results

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/27/2017
Received : 1/18/2017

Report Number : **17-018-0219**

REPORT OF ANALYSIS

Lab No : **90721**

Matrix: **Aqueous**

Sample ID : **Influent Composite 1/16-17/17**

Sampled: **1/17/2017 11:45**

Analytical Method: 625 **Prep Batch(es):** **L318945** 01/01/00 00:00

Prep Method: 625

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Naphthalene	<2.00	µg/L	2.00	1	01/23/17 19:08	RQE	L319010
Nitrobenzene	<5.00	µg/L	5.00	1	01/23/17 19:08	RQE	L319010
N-Nitrosodimethylamine	<5.00	µg/L	5.00	1	01/23/17 19:08	RQE	L319010
N-Nitrosodi-n-propylamine	<5.00	µg/L	5.00	1	01/23/17 19:08	RQE	L319010
N-Nitrosodiphenylamine	<10.0	µg/L	10.0	1	01/23/17 19:08	RQE	L319010
Phenanthrene	<2.00	µg/L	2.00	1	01/23/17 19:08	RQE	L319010
Pyrene	<2.00	µg/L	2.00	1	01/23/17 19:08	RQE	L319010
1,2,4-Trichlorobenzene	<5.00	µg/L	5.00	1	01/23/17 19:08	RQE	L319010
Surrogate: 2-Fluorobiphenyl	37.5 *		Limits: 38-107%	1	01/23/17 19:08	RQE	L319010
Surrogate: 2-Fluorophenol	13.5		Limits: 8-88%	1	01/23/17 19:08	RQE	L319010
Surrogate: Nitrobenzene-d5	37.3		Limits: 29-105%	1	01/23/17 19:08	RQE	L319010
Surrogate: Phenol-d6	10.1		Limits: 7-58%	1	01/23/17 19:08	RQE	L319010
Surrogate: 4-Terphenyl-d14	35.5		Limits: 30-130%	1	01/23/17 19:08	RQE	L319010
Surrogate: 2,4,6-Tribromophenol	46.6		Limits: 16-138%	1	01/23/17 19:08	RQE	L319010

Qualifiers/Definitions	*	Outside QC limit	DF	Dilution Factor
	MQL	Method Quantitation Limit	Q	RPD >40% dual column results

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/27/2017
Received : 1/18/2017

Report Number : **17-018-0219**

REPORT OF ANALYSIS

Lab No : **90722**

Matrix: **Aqueous**

Sample ID : **Effluent Grab**

Sampled: **1/17/2017 12:15**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Phenols (Total)	<5.000	µg/L	5.000	1	01/24/17 12:30	CLP	420.1
Cyanide, Total	<5.00	µg/L	5.00	1	01/23/17 12:51	EWB	4500CNE-2011

**Qualifiers/
Definitions**

*	Outside QC limit	DF	Dilution Factor
MQL	Method Quantitation Limit	Q	RPD >40% dual column results

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/27/2017
Received : 1/18/2017

Report Number : **17-018-0219**

REPORT OF ANALYSIS

Lab No : **90723**

Matrix: **Aqueous**

Sample ID : **Effluent Composite 1/16-17/17**

Sampled: **1/17/2017 12:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Antimony	1.96	µg/L	1.00	1	01/19/17 15:36	BKN	EPA-200.8
Total Arsenic	<0.500	µg/L	0.500	1	01/19/17 15:36	BKN	EPA-200.8
Total Beryllium	<0.500	µg/L	0.500	1	01/19/17 15:36	BKN	EPA-200.8
Total Cadmium	<0.100	µg/L	0.100	1	01/19/17 15:36	BKN	EPA-200.8
Total Chromium	<1.00	µg/L	1.00	1	01/19/17 15:36	BKN	EPA-200.8
Chromium, Hexavalent	<0.010	mg/L	0.010	1	01/18/17 10:44	KGL	3500CrB-2011
Total Copper	4.01	µg/L	0.500	1	01/19/17 15:36	BKN	EPA-200.8
Total Lead	0.525	µg/L	0.500	1	01/19/17 15:36	BKN	EPA-200.8
Mercury (Total)	8.99	ng/L	0.500	1	01/26/17 18:02	BTH	1631E
Total Nickel	8.40	µg/L	0.500	1	01/19/17 15:36	BKN	EPA-200.8
Total Selenium	<1.00	µg/L	1.00	1	01/19/17 15:36	BKN	EPA-200.8
Total Silver	<0.100	µg/L	0.100	1	01/19/17 15:36	BKN	EPA-200.8
Total Thallium	<0.100	µg/L	0.100	1	01/19/17 15:36	BKN	EPA-200.8
Total Zinc	93.8	µg/L	5.00	1	01/19/17 15:36	BKN	EPA-200.8
Total Molybdenum	2.95	µg/L	1.00	1	01/19/17 15:36	BKN	EPA-200.8

Analytical Method: 608

Prep Batch(es): **L319083** 01/24/17 13:30

Prep Method: EPA-608 (PREP FV1)

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Aldrin	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
alpha-BHC	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
beta-BHC	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201

**Qualifiers/
Definitions**

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor
Q RPD >40% dual column results

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/27/2017
Received : 1/18/2017

Report Number : **17-018-0219**

REPORT OF ANALYSIS

Lab No : **90723**

Matrix: **Aqueous**

Sample ID : **Effluent Composite 1/16-17/17**

Sampled: **1/17/2017 12:00**

Analytical Method: 608 **Prep Batch(es):** **L319083** 01/24/17 13:30

Prep Method: EPA-608 (PREP FV1)

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
gamma-BHC	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
delta-BHC	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Chlordane	<0.02000	µg/L	0.02000	1	01/24/17 20:47	VIC	L319201
4,4'-DDT	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
4,4'-DDE	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
4,4'-DDD	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Dieldrin	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
alpha Endosulfan	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
beta Endosulfan	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Endosulfan Sulfate	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Endrin	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Endrin Aldehyde	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Heptachlor	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Heptachlor Epoxide	<0.00400	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Chlorpyrifos	0.00512 Q	µg/L	0.00400	1	01/24/17 20:47	VIC	L319201
Toxaphene	<0.03000	µg/L	0.03000	1	01/24/17 20:47	VIC	L319201
Surrogate: Decachlorobiphenyl	57.54		Limits: 36-116%	1	01/24/17 20:47	VIC	L319201
Surrogate: Tetrachloro-m-xylene	68.67		Limits: 25-123%	1	01/24/17 20:47	VIC	L319201

Qualifiers/Definitions	*	Outside QC limit	DF	Dilution Factor
	MQL	Method Quantitation Limit	Q	RPD >40% dual column results

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/27/2017
Received : 1/18/2017

Report Number : **17-018-0219**

REPORT OF ANALYSIS

Lab No : **90723**

Matrix: **Aqueous**

Sample ID : **Effluent Composite 1/16-17/17**

Sampled: **1/17/2017 12:00**

Analytical Method: 625 Screen **Prep Batch(es):** **L318951** 01/23/17 15:30
Prep Method: 625

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
Dioxin (2,3,7,8-TCDD) screen	<1.00	µg/L	1.00	1	01/25/17 18:31	CGC	L319363 ~

Analytical Method: EPA-608 (PCB) **Prep Batch(es):** **L319085** 01/24/17 13:30
Prep Method: EPA-608 (PCB Prep)

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
Aroclor 1242	<0.200	µg/L	0.200	1	01/24/17 19:27	VIC	L319205
Aroclor 1254	<0.200	µg/L	0.200	1	01/24/17 19:27	VIC	L319205
Aroclor 1221	<0.200	µg/L	0.200	1	01/24/17 19:27	VIC	L319205
Aroclor 1232	<0.200	µg/L	0.200	1	01/24/17 19:27	VIC	L319205
Aroclor 1248	<0.200	µg/L	0.200	1	01/24/17 19:27	VIC	L319205
Aroclor 1260	<0.200	µg/L	0.200	1	01/24/17 19:27	VIC	L319205
Aroclor 1016	<0.200	µg/L	0.200	1	01/24/17 19:27	VIC	L319205
Surrogate: Decachlorobiphenyl	56.0		Limits: 25-125%	1	01/24/17 19:27	VIC	L319205
Surrogate: Tetrachloro-m-xylene	45.1		Limits: 25-125%	1	01/24/17 19:27	VIC	L319205

Qualifiers/Definitions	*	Outside QC limit	DF	Dilution Factor
	ML	Method Quantitation Limit	Q	RPD >40% dual column results

03322

Harrison Wastewater Treatment Plant
Ms. Kathryn Catlin
PO Box 1715
Harrison , AR 72601

Project INF Annual Tbl II & Quarterly Tbl III
Information : EFF PPS Annual Tbl II Quarterly Tbl III

Report Date : 01/27/2017
Received : 1/18/2017

Report Number : **17-018-0219**

REPORT OF ANALYSIS

Lab No : **90724**

Matrix: **Aqueous**

Sample ID : **Field Blank**

Sampled: **1/17/2017 12:15**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Mercury (Total)	1.31	ng/L	0.500	1	01/26/17 14:41	BTH	1631E

**Qualifiers/
Definitions**

*	Outside QC limit	DF	Dilution Factor
MQL	Method Quantitation Limit	Q	RPD >40% dual column results

Cooler Receipt Form

Customer Number: **03322**

Customer Name: **Harrison Wastewater Treatment Plant**

Report Number: **17-018-0219**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID: #10

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers received	<input type="text" value="2"/>		
Custody seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC properly completed	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Water - VOA vials free of headspace	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
Trip Blanks received with VOAs	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input type="checkbox"/> High concentration container (48 hr)		<input type="checkbox"/> Low concentration EnCore samplers (48 hr)	
<input type="checkbox"/> High concentration pre-weighed (methanol -14 d)		<input type="checkbox"/> Low conc pre-weighed vials (Sod Bis -14 d)	
Special precautions or instructions included?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature:

Date & Time:



Kit ID: 0000058895
Initiated By: Rebekah Barger Ross
Project Comment Do not send Quarterly kit when sending this Annual kit.

CHAIN-OF-CUSTODY



17-018-0219
 03322
 01-18-2017
 11:31:12
 Harrison Wastewater Treatment Plant
 INF Annual Tbl II & Quarterly Tbl III

Company Name Harrison Wastewater Treatment Plant	Company Number 03322	Client Project Manager/Contact Mr. Tim Holt	Purchase Order Number
Site Name Annual PPS & INF/EFF Tbl. II & III	Project Number	<input type="checkbox"/> RUSH – Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed	Method of Shipment <input type="checkbox"/> Fed Ex <input checked="" type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other
LIMS Project ID Harrison Annual Inf/Eff	Project Manager Phone # (870) 741-5527	Project Manager Email hwwtp2@windstream.net	Site/Facility ID #

Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
1-17-17	12:00pm	Influent	Aqueous	G	1	Plastic - Pint	NaOH - Sodium Hydroxide	Cyanide
1-17-17	12:09pm	Influent	Aqueous	G	1	Glass Clear - Quart	H2SO4 - Sulfuric Acid	Phenols
1-17-17	12:09pm	Influent	Aqueous	G	2	Glass Vial Amber - 40ml	HCL - Hydrochloric Acid	VOC
1-16/1-17-17	11:45am to 11:45am	Influent	Aqueous	C	1	Plastic - Pint	HNO3 - Nitric Acid	Ag, As, Be, Cd, Cr, Cu, Hg, Ni, Pb, Sb, Se, Tl, Zn
1-16/1-17-17	11:45am to 11:45am	Influent	Aqueous	C	1	Glass - Low Level Hg	NONE	Low Level Mercury
1-16/1-17-17	11:45am to 11:45am	Influent	Aqueous	C	2	Glass Amber - Liter	Na2S2O3 - Sodium Thiosulfate	SVOC
1-17-17	12:15pm	Effluent	Aqueous	G	1	Plastic - Pint	NaOH - Sodium Hydroxide	Cyanide
1-17-17	12:15pm	Effluent	Aqueous	G	1	Glass Clear - Quart	H2SO4 - Sulfuric Acid	Phenols

For Laboratory Use Only			Sampled by (Name - Print) Randy Reese		Client Remarks/Comments Annual INF + EFF				
Ice Q/N	Custody Seals Q/N	Lab Comments All vials have headspace. Will resample vials only per Randy Reese. 02	Relinquished by: (SIGNATURE) Randy Reese	Date Time 1-17-17/12:32pm	Received by: (SIGNATURE)	Date Time			
			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time			
Blank/Cooler Temp 1.1208 1.5°C TC			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE) D. One	Date Time 1/18/17 10:25			

Kit ID: 0000058895
Initiated By: Rebekah Barger Ross
Project Comment Do not send Quarterly kit when sending this Annual kit.

CHAIN-OF-CUST

 Harrison Wastewater Treatment Plant INF Annual Tbl II & Quarterly Tbl III	17-018-0219 03322 01-18-2017 11:31:12
--	--

Company Name Harrison Wastewater Treatment Plant	Company Number 03322	Client Project Manager/Contact Mr. Tim Holt	Purchase Order Number
Site Name Annual PPS & INF/EFF Tbl. II & III	Project Number	<input type="checkbox"/> RUSH – Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed	Method of Shipment <input type="checkbox"/> Fed Ex <input checked="" type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other
LIMS Project ID Harrison Annual Inf/Eff	Project Manager Phone # (870) 741-5527	Project Manager Email hwwtp2@windstream.net	Site/Facility ID #

Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
1-17-17	12:15 pm	Effluent	Aqueous	G	2	Glass Vial Amber - 40ml	HCL - Hydrochloric Acid	VOC
1-16/1-17-17	12:00 pm to 12:00 pm	Effluent	Aqueous	C	1	Plastic - Pint	HNO3 - Nitric Acid	Ag, As, Be, Cd, Cr, Cu, Hg, Ni, Pb, Sb, Se, Tl, Zn
1-16/1-17-17	12:00 pm to 12:00 pm	Effluent	Aqueous	C	2	Glass Amber - Liter	Na2S2O3 - Sodium Thiosulfate	Pest/PCB's
1-16/1-17-17	12:00 pm to 12:00 pm	Effluent	Aqueous	C	2	Glass Amber - Liter	Na2S2O3 - Sodium Thiosulfate	SVOC
1-16/1-17-17	12:00 pm to 12:00 pm	Effluent	Aqueous	C	2	Glass Amber - Liter	NONE	Dioxin Screen
1-16/1-17-17	12:00 pm to 12:00 pm	Effluent	Aqueous	C	1	Plastic - Pint	NONE	Hex Cr
1-16/1-17-17	12:00 pm to 12:00 pm	Effluent	Aqueous	C	1	Glass - Low Level Hg	NONE	Low Level Hg

For Laboratory Use Only		Sampled by (Name - Print) Randy Reese	Client Remarks/Comments Annual Inf + EFF					
Ice Y/N	Custody Seals Y/N	Relinquished by: (SIGNATURE) Randy Reese	Date	Time	Received by: (SIGNATURE)	Date	Time	
			1-17-17	12:30 pm				
Blank/Cooler Temp 1.1°C 1.5°C		Relinquished by: (SIGNATURE)	Date	Time	Received by: (SIGNATURE)	Date	Time	
					Dave	1/18/17	10:25	



Kit ID: 0000058895
Initiated By: Rebekah Barger Ross
Project Comment Do not send Quarterly kit when sending this Annual kit.

CHAIN-OF-CUSTODY

	17-018-0219
	03322
	01-18-2017
	11:31:12

Harrison Wastewater Treatment Plant
 INF Annual Tbl II & Quarterly Tbl III

Company Name Harrison Wastewater Treatment Plant		Company Number 03322	Client Project Manager/Contact Mr. Tim Holt			Purchase Order Number		
Site Name Annual PPS & INF/EFF Tbl. II & III		Project Number		<input type="checkbox"/> RUSH – Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed		Method of Shipment <input type="checkbox"/> Fed Ex <input type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other		
LIMS Project ID Harrison Annual Inf/Eff		Project Manager Phone # (870) 741-5527		Project Manager Email hwwtp2@windstream.net		Site/Facility ID #		
Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
1-17-17	12:15pm	Field Blank	Aqueous	G	1	Glass - Low Level Hg	NONE	Low Level Hg

For Laboratory Use Only			Sampled by (Name - Print)	Client Remarks/Comments			
Ice Y/N	Custody Seals Y/N	Lab Comments	Randy Reese	Annual INF + EFF			
			Relinquished by: (SIGNATURE) <i>Randy Reese</i>	Date Time 1-17-17/12:30pm	Received by: (SIGNATURE)	Date Time	
			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time	
Blank/Cooler Temp 10.20 10.20 10.20			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE) <i>[Signature]</i>	Date Time 1/17/17 1025	

**Part I
 PERMIT REQUIREMENTS**

LIMITATIONS AND MONITORING REQUIREMENTS:

The following tables detail the constituent limits, monitoring frequencies, and the requirements for reporting results to ADEQ for each respective parameter listed in the table heading.

TABLE I			
Biosolids Analysis, Reporting, and Record Keeping			
Parameter	Ceiling Concentrations (mg/kg)¹	Cumulative Pollutant Loading Rate (lb/ac)⁴	Monitoring Frequency
Arsenic	75	37	Annually, prior to the 1 st application of the calendar year
Cadmium	85	35	
Copper	4300	1350	
Lead	840	270	
Mercury	57	15	
Molybdenum	75	Report	
Nickel	420	378	
Selenium	100	90	
Zinc	7500	2520	
Polychlorinated Biphenyls (PCB's)	50	N/A	
Parameter	Maximum Limit	Reporting Units	Monitoring Frequency
Total Solids	Report	Percentage (%)	Annually, prior to the 1 st application of the calendar year
pH		S.U.	
Nitrate Nitrogen		mg/kg ¹	
Nitrite Nitrogen			
Ammonia Nitrogen			
Total Kjeldahl Nitrogen			
Total Phosphorus			
Total Potassium		Unitless	
Sodium Absorption Ratio (SAR)			
Total Volume of Waste Applied		Dry tons/acre/year	Lbs N/acre/year
Nitrogen Application Rate	^{2,3} Depends on Crop		

¹ Dry-weight Basis

² The land application of waste must not exceed the limits for Nitrogen Application Rate.

³ Refer to Condition No. 3 of Part II of the permit.

⁴ Refer to Condition No. 5 of Part II of the permit.

From: [Kathryn Catlin](#)
To: [Beck, Amy; Water-Inspection-Report](#)
Cc: [Randy Reese](#)
Subject: RE: Revised City of Harrison Pretreatment Compliance Inspection Response
Date: Tuesday, November 20, 2018 10:37:38 AM
Attachments: [Follow-up Inspection Response 11-20-18.pdf](#)

Amy,

Attached find the City of Harrison's response to your November 16, 2018 email requested documentation of conversations with ADEQ concerning the frequency of biosolids sampling requirements. In the response I have provided additional information from the initial land application permit for our interpretation that the frequency of biosolids sampling was reduced from quarterly to annually. Please let me know if you require any additional information. Thank you.



Kathryn Catlin, MBA

Wastewater Systems Manager

PO Box 1715

Harrison, AR 72602

870-741-5527

kathryn.catlin@cityofharrison.com

From: Beck, Amy <BECK@adeq.state.ar.us>
Sent: Friday, November 16, 2018 10:56 AM
To: Kathryn Catlin <kathryn.catlin@cityofharrison.com>
Subject: RE: Revised City of Harrison Pretreatment Compliance Inspection Response

Ms. Catlin,

Can you provide documentation of your conversation with ADEQ allowing the less frequent monitoring of biosolids? You referred to this under Item 3 of your response letter. I have searched the Department records but did not find it documented. You currently are required to comply with both sets of permit conditions.

Here is a copy of the inspection and your response for reference.

<https://www.adeq.state.ar.us/downloads/WebDatabases/InspectionsOnline/104985-insp.pdf>

Amy Beck
District 5 Water Inspector
(479) 968-7339 ext. 16

From: Kathryn Catlin [<mailto:kathryn.catlin@cityofharrison.com>]
Sent: Thursday, October 25, 2018 7:54 AM
To: Water-Inspection-Report; Beck, Amy
Cc: Randy Reese
Subject: Revised City of Harrison Pretreatment Compliance Inspection Response

Please disregard the previously submitted response to the City of Harrison's Pretreatment Compliance Inspection conducted on October 10, 2018. The initial response from the City of Harrison included an Attachment A that contained analytical results for 2018 rather than 2017 as stated in the written response. Attached find the revised response with the correct Attachment A. If you have any questions or require any additional information, please feel free to contact me. Thank you and I apologize for the confusion.



Kathryn Catlin, MBA

Wastewater Systems Manager

PO Box 1715

Harrison, AR 72602

870-741-5527

kathryn.catlin@cityofharrison.com



Department of Public Works

11/19/2018

Amy Beck

Atten: Water Division Inspection Branch

ADEQ – Water Division

5301 Northshore Drive

North Little Rock, AR 72118-5317

Wastewater Department

Kathryn Catlin

Wastewater Systems Manager

1508 Silver Valley Road

Harrison, Arkansas 72601

Office: 870.741.5527

Fax: 870.741.0318

www.cityofharrison.com

kathryn.catlin@cityofharrison.com

RE: City of Harrison WWTP Inspection (Boone Co)
AFIN: 05-00054 Permit No.: AR0034321

Dear Ms. Beck:

The following is in response to your November 16, 2018 email concerning the biosolids sampling requirements, which are listed under Item 3 in the September 10, 2018 pretreatment inspection Summary of Findings:

Item 3 – When the City of Harrison submitted a permit renewal application for NPDES Permit AR0034321 in 2012, we requested a separate land application permit for our biosolids program that included a land management plan. ARL034321, Permit No.: 5158-W went into effect December 1, 2012. Per Part I Table I of the permit, biosolids analysis is required once annually prior to the 1st application of the calendar year (Attachment A). On page 2 of the Statement of Basis under item 7. Changes from the Previously Issued Permit, Item A. reads “Change monitoring frequency for the waste from quarterly to annually, prior to the 1st application of the calendar year” (Attachment B). This permit was renewed December 1, 2017 with the same annual frequency for biosolids analysis.

In my October 25, 2018 ADEQ Pretreatment Inspection response I noted that upon receiving the new land application permit I contacted both ADEQ and EPA concerning the monitoring frequency. Your November 16th email requested documentation of these discussion. Unfortunately, I failed to document the representative I spoke with at ADEQ. The EPA representative I spoke with concerning the changes in monitoring frequency was Helen Nguyen.

If you have any questions or require any additional information, please feel free to contact me at 870-741-5527 or Kathryn.catlin@cityofharrison.com. Thank you.

Sincerely,

Kathryn Catlin

Wastewater Systems Manager

Part I
PERMIT REQUIREMENTS

SECTION A. LIMITATIONS AND MONITORING REQUIREMENTS:

The following tables detail the constituent limits, monitoring frequencies, and the requirements for reporting results to ADEQ for each respective parameter listed in the table heading.

TABLE I			
Biosolids Analysis, Reporting, and Record Keeping			
Parameter	Ceiling Concentrations (mg/kg) ¹	Cumulative Pollutant Loading Rate (lb/ac)	Monitoring Frequency
Arsenic	75	37	Annually, prior to the 1 st application of the calendar year
Cadmium	85	35	
Copper	4300	1350	
Lead	840	270	
Mercury	57	15	
Molybdenum	75	Report	
Nickel	420	378	
Selenium	100	90	
Zinc	7500	2520	
Polychlorinated Biphenyls (PCB's)	50	N/A	
Parameter	Maximum Limit	Reporting Units	Monitoring Frequency
Total Solids	Report	Percentage (%)	Annually, prior to the 1 st application of the calendar year
pH		S.U.	
Nitrate Nitrogen		mg/kg ¹	
Nitrite Nitrogen			
Ammonia Nitrogen			
Total Kjeldahl Nitrogen			
Total Phosphorus			
Total Potassium			
Magnesium			
Sodium			
Calcium			
Sodium Absorption Ratio (SAR)		Unitless	
Total Volume of Waste Applied		gallons/acre/year	Prior to each application
Nitrogen Application Rate	² Depends on Crop	Lbs N/acre/year	

¹ Dry-weight basis² Refer to Condition No. 3 of Part II of the permit.

TABLE II		
Soils Analysis, Reporting, and Record Keeping		
Parameter	Limit (Reporting Units)	Monitoring Frequency
Electrical Conductivity	4.0 (mmhos/cm) ²	Annually, Prior to the 1 st application of the calendar year
Cation Exchange Capacity	Report (meq/100g)	
pH ¹	Report (s.u.)	
Sodium Adsorption Ratio (SAR)	12.0 (unitless) ²	
Calcium	Report (mg/kg)	
Magnesium		
Sodium		
Nitrate-Nitrogen		
Phosphorus		
Potassium		
Parameter	Limit (Reporting Units)	Monitoring Frequency
Arsenic	Report (mg/kg)	Once every five (5) years
Cadmium		
Copper		
Lead		
Mercury		
Molybdenum		
Nickel		
Selenium		
Zinc		

¹ If the resulting pH is 5.7 or lower for the soil analysis, lime must be applied, in the section of the field that the soil sample represents, in accordance with recommendations from the University of Arkansas Cooperative Extension Service.

² If a soil analysis exceeds any limit set in Table II of Part I, waste cannot be applied in the section of the field that the soil sample represents until an additional soil analysis shows compliance with all limits set in Table II of Part I.

SECTION B. SCHEDULE OF COMPLIANCE:

Compliance with the monitoring requirement for additional parameters and limits added to the soil analysis and the waste analysis shall commence on January 1, 2013. Application of waste in 2013 shall not be executed until the waste samples and soil samples are analyzed for the parameters listed in Table I and Table II of Part I of this permit.

The permittee has previously land applied biosolids under NPDES Permit No. AR0034321. The NPDES permit will no longer include land application of biosolids, and this No-Discharge permit now covers all land application of biosolids at the permitted sites.

The permittee submitted a permit renewal application for a No-Discharge permit, which was received on 3/29/2012 with additional information received on 4/10/2012, 4/11/2012, 4/13/2012, 8/10/2012, 8/21/2012 and 8/29/2012. It is proposed that the renewed water no-discharge permit be reissued for a 5-year term.

Legal Order Review:

There are currently no active Consent Administrative Orders (CAOs) or Notice of Violations (NOVs) for this facility.

Site Visits/Inspections:

The Inspection Branch performed a Pretreatment Compliance Inspection and an Industrial Storm Water No Exposure Certification Inspection on June 1, 2012, which revealed no violations of the permit.

7. Changes from the Previously Issued Permit

- A. Change monitoring frequency for the waste from quarterly to annually, prior to the 1st application of the calendar year.
- B. Remove monitoring requirements for Volatile Solids in the waste.
- C. Add monitoring and reporting requirements for Molybdenum, Magnesium, Sodium, Calcium, and Sodium Adsorption Ratio (SAR) in the waste.
- D. Add monitoring and reporting requirements for Sodium, Calcium, and Molybdenum.
- E. Add a limit for Electrical Conductivity and Sodium Adsorption Ratio (SAR) in the soil.

8. Applicant Activity

Under the standard industrial classification (SIC) code 4952 or North American Industry Classification System (NAICS) code 221320, the applicant's activities are the operation of sewerage system.

9. Waste Application Method

The City of Harrison will transport biosolids from a Wastewater Treatment Plant by a spreader truck to land application sites located in Boone County. Where the material will be surface applied.

10. Total Available Acreage

There are 675 acres available for land application. The annual application of biosolids will be based on the rates developed using the phosphorus index; however, the total nitrogen application will be monitored to insure that the most limiting nutrient is not exceeded during application.



A R K A N S A S
Department of Environmental Quality

December 12, 2018

Kathryn Catlin, Wastewater Manager
City of Harrison
P.O. Box 1715
Harrison, AR 72601

RE: City of Harrison WWTP PCI - Response to Inspections (Boone Co)
AFIN: 05-00054 **NPDES Permit No.: AR0034321**

Dear Ms. Catlin:

I have reviewed the response pertaining to my September 10, 2018 inspection of the City's Pretreatment Program. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (479) 968-7339 ext. 16 or you may e-mail me at beck@adeq.state.ar.us.

Sincerely,

A handwritten signature in cursive script that reads "Amy Beck".

Amy Beck
District 5 Field Inspector
Office of Water Quality