



DIVISION OF ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

July 11, 2024

Thom Vinson, Process & Compliance Coordinator
Jacobs
1400 North Fox Hunter Rd
Fayetteville, AR 72701

RE: City of Berryville WRRF
AFIN: 08-00034 Permit No.: AR0021792

Dear Mr. Vinson,

Division of Environmental Quality (DEQ) performed a laboratory data audit of the City of Berryville WRRF Laboratory, 1000 W. Cedarville Rd., Berryville, Arkansas 72616 in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the rules promulgated thereunder. The Laboratory Audit Report details three (3) findings that need to be addressed and five (5) recommendations for your consideration to help the laboratory function more efficiently and improve recordkeeping.

Please provide a written response to each finding that includes, but is not limited to,

- The corrective action to be taken,
- The estimated time to complete the corrective action,
- And a demonstration, if necessary, that the corrective action was sufficient to resolve the deficiency.

The corrective action response is due by August 12, 2024, and may be emailed to WaterLab@adeq.state.ar.us.

If you have any questions, please contact Lessie Redican at 501-682-0937 or by email at lessie.redican@adeq.state.ar.us or Stacie Wassell by email at Stacie.wassell@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink that reads "Lessie Redican".

Lessie Redican,
Laboratory Branch Manager, Office of Water Quality
Division of Environmental Quality

Cc: Richard Healy, Enforcement Branch Manager, Office of Water Quality
Jason Bolenbaugh, Compliance Manager, Office of Water Quality
Stacie Wassell, Associate Director, Office of Water Quality



LABORATORY DATA AUDIT REPORT

Berryville WRRF
Permit Number: AR0021792

Introduction

The Arkansas Department of Energy and Environment Division of Environmental Quality (DEQ), Office of Water Quality Laboratory conducted a data audit of the Berryville WRRF in-house laboratory (Pemittee) pursuant to the Part III, Section B, Condition 1 and Part III, Section C, Condition 3 of Permit AR0021792 and 40 C. F. R. § 136. The purpose of the audit was to verify that Permittee is complying with Part III, Section B, Condition 1 and Part III, Section C, Condition 3 of Permit AR0021792 and 40 C. F. R. § 136, and correctly implementing approved analytical methods, including acceptable quality control, and maintaining adequate laboratory documentation.

DEQ performed a data document audit and reviewed documents submitted by Permittee. The findings and recommendations are set forth below.

This Laboratory Audit Report reports only on the documents submitted to DEQ for review. This report may not include all deficiencies in the provided documents. No representation is made as to any documents not specifically commented upon.

Summary of Findings and Recommendations

	Findings	Recommendations
General Recordkeeping	0	1
Dissolved Oxygen	1	2
pH	1	2
DMRQA	1	0
TOTAL	3	5

I. General Recordkeeping

During the laboratory data audit, DEQ noted zero (0) findings and one (1) recommendation.

#		Description	Correction Date	Completion Date
1.	Recommendation	With MUR 2023 in effect June 17, 2024, it is time to update the Method References to meet the changes in 40 CFR 136.	January 1, 2025	



II. Analysis: Dissolved Oxygen (DO)

During the laboratory data audit, DEQ noted one (1) finding and two (2) recommendations.

#		Description	Correction Date	Completion Date
2.	Finding	QC elements, #3: A Proficiency Test needs to be added annually for DO.		
3.	Recommendation	Procedure: Is there a warmup time for the meter before calibration? When the probe has been out of use for an extended period, define "an extended period".		
4.	Recommendation	Maintenance: how do you keep up with when to replace the probe cap? Is there an indication that it might need to be done sooner than 365 days?		

III. Analysis: pH

During the laboratory data audit, DEQ noted one (1) finding and two (2) recommendations.

#		Description	Correction Date	Completion Date
5.	Finding	Lacks Lot numbers and/or expiration dates for calibration buffers and QC check buffer.		
6.	Recommendation	Establish a maintenance logbook for pH probe cleaning and maintenance.		
7.	Recommendation	Format SOP such that bullet points are not used. This will make each chemical and reagent easier to identify. Add specifications to the chemicals such as ACS grade or ultrapure. Vendor part numbers make reordering easier, but be sure to include "or equivalent" to avoid having to revise the SOP in case of a vendor change.		

IV. Proficiency / DMRQA Records

During the laboratory data audit, DEQ noted one (1) finding and zero (0) recommendations.

#		Description	Correction Date	Completion Date
8.	Finding	Need to add a proficiency test for Dissolved Oxygen.		



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V.	Training Logs	No findings or Recommendations.
VI.	Calibration Records	No findings or Recommendations.
VII.	Bench Sheets and Data	No findings or Recommendations.
VIII.	QA Records	No findings or Recommendations.
IX.	Sample collection	No findings or Recommendations.
X.	Flow Measurements	No findings or Recommendations.