



P.O. Box 1807 • Phone (479) 754-3148 • Clarksville, Arkansas 72830

November 10, 2015

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: AR0022187

To whom it may concern:

Clarksville Light and Water is asking for a reduction in our biomonitoring sampling. I certify under penalty of law that we have passed every criteria of this biomonitoring test over the last four consecutive quarters. In addition, I have enclosed the results of the sampling for these quarters. If you have any questions call (479) 754-6241 Ext. 302

Sincerely:

Gregg Rainey
Wastewater Superintendent

Enclosures

TOXICITY TEST REPORT - CHRONIC

Client Environmental Enterprise Group Sample..... Outfall 001
Facility City of Clarksville WWTP Laboratory I.D. 24791
Permit No. NPDES AR0022187 Begin Date October 20, 2015

Results: Pass *Ceriodaphnia dubia* survival and reproduction and *Pimephales promelas* survival and growth at the critical low flow concentration (100% effluent).

SAMPLE COLLECTION

Composite effluent samples from Environmental Enterprise Group, City of Clarksville WWTP were delivered by United Parcel Service courier to Huther & Associates on October 20, October 22, and October 24, 2015. Effluent samples were collected and composited from Outfall 001 using an automatic sampler by facility personnel. Two toxicity tests were requested: a seven-day *Ceriodaphnia dubia* survival and reproduction test (EPA Method 1002.0), and a seven-day *Pimephales promelas* larval survival and growth test (EPA Method 1000.0). Test organisms, procedures and quality assurance requirements were in accordance with the EPA manual, "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, Fourth Edition" (EPA-821-R-02-013).

The effluent and receiving water samples were analyzed for total residual chlorine (Standard Methods, 22nd Edition, 4500-Cl D) and contained <0.01 mg/L, <0.01 mg/L, and <0.01 mg/L, respectively. Effluent and receiving dilution water hardness, alkalinity, conductivity, pH, and dissolved oxygen data were collected and recorded.

TEST SETUP
Ceriodaphnia dubia



The seven-day *Ceriodaphnia dubia* survival and reproduction test was initiated at 1500 hours, October 20, 2015. Five concentrations were prepared (32%, 42%, 56%, 75%, and 100% effluent) utilizing receiving water (Lake Dardanelle) as dilution water. The test was conducted in 25 mL distilled water rinsed plastic beakers containing 15 mL of solution (one neonate per beaker, ten beakers per concentration). *C. dubia* neonates were less than 24-hours old and within eight hours of the same age at test initiation. Neonates were placed in beakers following a randomized block test design. Fresh solutions were prepared and renewed daily. Daily feeding consisted of 0.5 mL *Selenastrum capricornutum* and cerophyll per test chamber. The test proceeded for seven days during which survival, reproduction and water quality data were collected daily.

A true control of ten replicate chambers containing one neonate each in receiving water was conducted concurrently with the test. There was 100% survival in the true control. In addition, a performance control of ten replicate chambers containing one neonate each in synthetic laboratory water was conducted concurrently with the test. The purpose of the performance control was to assess the health of the test organisms and to identify receiving water toxicity. The performance control data was not used in the statistical analysis of the test data. There was 100% survival in the performance control. The test ended at 1500 hours, October 27, 2015. Survival and reproduction data were statistically analyzed ($p = 0.05$) according to EPA procedures to determine the Lowest Observable Effect Concentration (LOEC) and the No Observable Effect Concentration (NOEC).

SURVIVAL

Ceriodaphnia dubia

There was 100% survival to *C. dubia* in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable

NOEC: 100% Effluent

REPRODUCTION

Ceriodaphnia dubia

C. dubia reproduction data were normally distributed at the 0.01 alpha level (13.277) using Chi-Square test for normality. Reproduction data were homogeneous using Bartlett's test at the 0.01 alpha level (15.09) without data transformations. Therefore, a parametric test was performed on the homogeneous data. Dunnett's test on *C. dubia* reproduction data demonstrated that there were no statistically significant differences between the control and any of the effluent concentrations.

LOEC: Not Applicable

PMSD: 6.6%

NOEC: 100% Effluent

TEST SETUP

Pimephales promelas



The seven-day *Pimephales promelas* larval survival and growth test was initiated at 1615 hours, October 20, 2015. Five concentrations were prepared (32%, 42%, 56%, 75%, and 100% effluent) utilizing receiving water (Lake Dardanelle) as dilution water. The test was conducted in 300 mL distilled water rinsed plastic beakers containing 250 mL of solution (eight larvae per beaker, five beakers per concentration). *P. promelas* larvae were less than 24-hours old at test initiation and originated from a minimum of three in-house spawnings. Fresh solutions were prepared and renewed daily. Larvae in each test chamber were fed <24-hour-old *Artemia* (brine shrimp) three times per day. The test proceeded for seven days during which survival and water quality data were collected daily.

A true control of five replicate chambers of eight larvae each in receiving water was conducted concurrently with the test. There was 100% survival in the true control. In addition, a performance control of five replicate chambers of eight larvae each in synthetic laboratory water was conducted concurrently with the test. The purpose of the performance control was to assess the health of the test larvae and to identify receiving water toxicity. The performance control data was not used in the statistical analysis of the test data. There was 100% survival in the performance control. At the end of the test, all larvae were sacrificed, dried, and weighed. The test ended at 1615 hours, October 27, 2015. Survival and growth (weight) data were statistically analyzed ($p = 0.05$) according to EPA procedures to determine the Lowest Observable Effect Concentration (LOEC) and the No Observable Effect Concentration (NOEC).

SURVIVAL***Pimephales promelas***

There was 100% survival to *P. promelas* in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable

NOEC: 100% Effluent

GROWTH***Pimephales promelas***

P. promelas growth data were normally distributed at the 0.01 alpha level (0.900) using Shapiro Wilk's test for normality. Growth data were homogeneous using Bartlett's test at the 0.01 alpha level (15.09) without data transformations. Therefore, a parametric test was performed on the homogeneous data. Dunnett's test on *P. promelas* growth data demonstrated that there were no statistically significant differences between the control and any of the effluent concentrations.

LOEC: Not Applicable

NOEC: 100% Effluent

PMSD: 10.0%

SUMMARY

There were no statistically significant differences between the control and the critical low flow concentration (100% effluent) for *C. dubia* survival and reproduction and *P. promelas* survival and growth. Based on biomonitoring requirements for Outfall 001 contained in Permit Number NPDES AR0022187 for Environmental Enterprise Group, City of Clarksville WWTP, Outfall 001 passed for this testing period.

TOXICITY TEST REPORT - CHRONIC

Client Environmental Enterprise Group Sample..... Outfall 001
Facility City of Clarksville WWTP Laboratory I.D. 24791
Permit No: NPDES AR0022187 Begin Date October 20, 2015

Results: Pass *Ceriodaphnia dubia* survival and reproduction and *Pimephales promelas* survival and growth at the critical low flow concentration (100% effluent).

SAMPLE COLLECTION

Composite effluent samples from Environmental Enterprise Group, City of Clarksville WWTP were delivered by United Parcel Service courier to Huther & Associates on October 20, October 22, and October 24, 2015. Effluent samples were collected and composited from Outfall 001 using an automatic sampler by facility personnel. Two toxicity tests were requested: a seven-day *Ceriodaphnia dubia* survival and reproduction test (EPA Method 1002.0), and a seven-day *Pimephales promelas* larval survival and growth test (EPA Method 1000.0). Test organisms, procedures and quality assurance requirements were in accordance with the EPA manual, "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, Fourth Edition" (EPA-821-R-02-013).

The effluent and receiving water samples were analyzed for total residual chlorine (Standard Methods, 22nd Edition, 4500-Cl D) and contained <0.01 mg/L, <0.01 mg/L, and <0.01 mg/L, respectively. Effluent and receiving dilution water hardness, alkalinity, conductivity, pH, and dissolved oxygen data were collected and recorded.

TEST SETUP
Ceriodaphnia dubia



The seven-day *Ceriodaphnia dubia* survival and reproduction test was initiated at 1500 hours, October 20, 2015. Five concentrations were prepared (32%, 42%, 56%, 75%, and 100% effluent) utilizing receiving water (Lake Dardanelle) as dilution water. The test was conducted in 25 mL distilled water rinsed plastic beakers containing 15 mL of solution (one neonate per beaker, ten beakers per concentration). *C. dubia* neonates were less than 24-hours old and within eight hours of the same age at test initiation. Neonates were placed in beakers following a randomized block test design. Fresh solutions were prepared and renewed daily. Daily feeding consisted of 0.5 mL *Selenastrum capricornutum* and cerophyll per test chamber. The test proceeded for seven days during which survival, reproduction and water quality data were collected daily.

A true control of ten replicate chambers containing one neonate each in receiving water was conducted concurrently with the test. There was 100% survival in the true control. In addition, a performance control of ten replicate chambers containing one neonate each in synthetic laboratory water was conducted concurrently with the test. The purpose of the performance control was to assess the health of the test organisms and to identify receiving water toxicity. The performance control data was not used in the statistical analysis of the test data. There was 100% survival in the performance control. The test ended at 1500 hours, October 27, 2015. Survival and reproduction data were statistically analyzed ($p = 0.05$) according to EPA procedures to determine the Lowest Observable Effect Concentration (LOEC) and the No Observable Effect Concentration (NOEC).

SURVIVAL***Ceriodaphnia dubia***

There was 100% survival to *C. dubia* in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable

NOEC: 100% Effluent

REPRODUCTION***Ceriodaphnia dubia***

C. dubia reproduction data were normally distributed at the 0.01 alpha level (13.277) using Chi-Square test for normality. Reproduction data were homogeneous using Bartlett's test at the 0.01 alpha level (15.09) without data transformations. Therefore, a parametric test was performed on the homogeneous data. Dunnett's test on *C. dubia* reproduction data demonstrated that there were no statistically significant differences between the control and any of the effluent concentrations.

LOEC: Not Applicable

NOEC: 100% Effluent

PMSD: 6.6%

TEST SETUP***Pimephales promelas***

The seven-day *Pimephales promelas* larval survival and growth test was initiated at 1615 hours, October 20, 2015. Five concentrations were prepared (32%, 42%, 56%, 75%, and 100% effluent) utilizing receiving water (Lake Dardanelle) as dilution water. The test was conducted in 300 mL distilled water rinsed plastic beakers containing 250 mL of solution (eight larvae per beaker, five beakers per concentration). *P. promelas* larvae were less than 24-hours old at test initiation and originated from a minimum of three in-house spawnings. Fresh solutions were prepared and renewed daily. Larvae in each test chamber were fed <24-hour-old *Artemia* (brine shrimp) three times per day. The test proceeded for seven days during which survival and water quality data were collected daily.

A true control of five replicate chambers of eight larvae each in receiving water was conducted concurrently with the test. There was 100% survival in the true control. In addition, a performance control of five replicate chambers of eight larvae each in synthetic laboratory water was conducted concurrently with the test. The purpose of the performance control was to assess the health of the test larvae and to identify receiving water toxicity. The performance control data was not used in the statistical analysis of the test data. There was 100% survival in the performance control. At the end of the test, all larvae were sacrificed, dried, and weighed. The test ended at 1615 hours, October 27, 2015. Survival and growth (weight) data were statistically analyzed ($p = 0.05$) according to EPA procedures to determine the Lowest Observable Effect Concentration (LOEC) and the No Observable Effect Concentration (NOEC).

SURVIVAL***Pimephales promelas***

There was 100% survival to *P. promelas* in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable

NOEC: 100% Effluent

GROWTH***Pimephales promelas***

P. promelas growth data were normally distributed at the 0.01 alpha level (0.900) using Shapiro Wilk's test for normality. Growth data were homogeneous using Bartlett's test at the 0.01 alpha level (15.09) without data transformations. Therefore, a parametric test was performed on the homogeneous data. Dunnett's test on *P. promelas* growth data demonstrated that there were no statistically significant differences between the control and any of the effluent concentrations.

LOEC: Not Applicable

NOEC: 100% Effluent

PMSD: 10.0%

SUMMARY

There were no statistically significant differences between the control and the critical low flow concentration (100% effluent) for *C. dubia* survival and reproduction and *P. promelas* survival and growth. Based on biomonitoring requirements for Outfall 001 contained in Permit Number NPDES AR0022187 for Environmental Enterprise Group, City of Clarksville WWTP, Outfall 001 passed for this testing period.

TOXICITY TEST REPORT - CHRONIC

Client Environmental Enterprise Group Sample..... Outfall 001
Facility City of Clarksville WWTP Laboratory I.D. 24791
Permit No. NPDES AR0022187 Begin Date October 20, 2015

Results: Pass *Ceriodaphnia dubia* survival and reproduction and *Pimephales promelas* survival and growth at the critical low flow concentration (100% effluent).

SAMPLE COLLECTION

Composite effluent samples from Environmental Enterprise Group, City of Clarksville WWTP were delivered by United Parcel Service courier to Huther & Associates on October 20, October 22, and October 24, 2015. Effluent samples were collected and composited from Outfall 001 using an automatic sampler by facility personnel. Two toxicity tests were requested: a seven-day *Ceriodaphnia dubia* survival and reproduction test (EPA Method 1002.0), and a seven-day *Pimephales promelas* larval survival and growth test (EPA Method 1000.0). Test organisms, procedures and quality assurance requirements were in accordance with the EPA manual, "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, Fourth Edition" (EPA-821-R-02-013).

The effluent and receiving water samples were analyzed for total residual chlorine (Standard Methods, 22nd Edition, 4500-Cl D) and contained <0.01 mg/L, <0.01 mg/L, and <0.01 mg/L, respectively. Effluent and receiving dilution water hardness, alkalinity, conductivity, pH, and dissolved oxygen data were collected and recorded.

TEST SETUP
Ceriodaphnia dubia



The seven-day *Ceriodaphnia dubia* survival and reproduction test was initiated at 1500 hours, October 20, 2015. Five concentrations were prepared (32%, 42%, 56%, 75%, and 100% effluent) utilizing receiving water (Lake Dardanelle) as dilution water. The test was conducted in 25 mL distilled water rinsed plastic beakers containing 15 mL of solution (one neonate per beaker, ten beakers per concentration). *C. dubia* neonates were less than 24-hours old and within eight hours of the same age at test initiation. Neonates were placed in beakers following a randomized block test design. Fresh solutions were prepared and renewed daily. Daily feeding consisted of 0.5 mL *Selenastrum capricornutum* and cerophyll per test chamber. The test proceeded for seven days during which survival, reproduction and water quality data were collected daily.

A true control of ten replicate chambers containing one neonate each in receiving water was conducted concurrently with the test. There was 100% survival in the true control. In addition, a performance control of ten replicate chambers containing one neonate each in synthetic laboratory water was conducted concurrently with the test. The purpose of the performance control was to assess the health of the test organisms and to identify receiving water toxicity. The performance control data was not used in the statistical analysis of the test data. There was 100% survival in the performance control. The test ended at 1500 hours, October 27, 2015. Survival and reproduction data were statistically analyzed ($p = 0.05$) according to EPA procedures to determine the Lowest Observable Effect Concentration (LOEC) and the No Observable Effect Concentration (NOEC).

SURVIVAL***Ceriodaphnia dubia***

There was 100% survival to *C. dubia* in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable

NOEC: 100% Effluent

REPRODUCTION***Ceriodaphnia dubia***

C. dubia reproduction data were normally distributed at the 0.01 alpha level (13.277) using Chi-Square test for normality. Reproduction data were homogeneous using Bartlett's test at the 0.01 alpha level (15.09) without data transformations. Therefore, a parametric test was performed on the homogeneous data. Dunnett's test on *C. dubia* reproduction data demonstrated that there were no statistically significant differences between the control and any of the effluent concentrations.

LOEC: Not Applicable

NOEC: 100% Effluent

PMSD: 6.6%

TEST SETUP***Pimephales promelas***

The seven-day *Pimephales promelas* larval survival and growth test was initiated at 1615 hours, October 20, 2015. Five concentrations were prepared (32%, 42%, 56%, 75%, and 100% effluent) utilizing receiving water (Lake Dardanelle) as dilution water. The test was conducted in 300 mL distilled water rinsed plastic beakers containing 250 mL of solution (eight larvae per beaker, five beakers per concentration). *P. promelas* larvae were less than 24-hours old at test initiation and originated from a minimum of three in-house spawnings. Fresh solutions were prepared and renewed daily. Larvae in each test chamber were fed <24-hour-old *Artemia* (brine shrimp) three times per day. The test proceeded for seven days during which survival and water quality data were collected daily.

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SURVIVAL
Pimephales promelas

There was 100% survival to *P. promelas* in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable
NOEC: 100% Effluent

GROWTH
Pimephales promelas

P. promelas growth data were normally distributed at the 0.01 alpha level (0.900) using Shapiro Wilk's test for normality. Growth data were homogeneous using Bartlett's test at the 0.01 alpha level (15.09) without data transformations. Therefore, a parametric test was performed on the homogeneous data. Dunnett's test on *P. promelas* growth data demonstrated that there were no statistically significant differences between the control and any of the effluent concentrations.

LOEC: Not Applicable **PMSD: 10.0%**
NOEC: 100% Effluent

SUMMARY

There were no statistically significant differences between the control and the critical low flow concentration (100% effluent) for *C. dubia* survival and reproduction and *P. promelas* survival and growth. Based on biomonitoring requirements for Outfall 001 contained in Permit Number NPDES AR0022187 for Environmental Enterprise Group, City of Clarksville WWTP, Outfall 001 passed for this testing period.

TOXICITY TEST REPORT - CHRONIC

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TEST SETUP
Ceriodaphnia dubia



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SURVIVAL***Ceriodaphnia dubia***

There was 100% survival to *C. dubia* in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable

NOEC: 100% Effluent

REPRODUCTION***Ceriodaphnia dubia***

C. dubia reproduction data were normally distributed at the 0.01 alpha level (13.277) using Chi-Square test for normality. Reproduction data were homogeneous using Bartlett's test at the 0.01 alpha level (15.09) without data transformations. Therefore, a parametric test was performed on the homogeneous data. Dunnett's test on *C. dubia* reproduction data demonstrated that there were no statistically significant differences between the control and any of the effluent concentrations.

LOEC: Not Applicable

NOEC: 100% Effluent

PMSD: 6.6%

TEST SETUP***Pimephales promelas***

The seven-day *Pimephales promelas* larval survival and growth test was initiated at 1615 hours, October 20, 2015. Five concentrations were prepared (32%, 42%, 56%, 75%, and 100% effluent) utilizing receiving water (Lake Dardanelle) as dilution water. The test was conducted in 300 mL distilled water rinsed plastic beakers containing 250 mL of solution (eight larvae per beaker, five beakers per concentration). *P. promelas* larvae were less than 24-hours old at test initiation and originated from a minimum of three in-house spawnings. Fresh solutions were prepared and renewed daily. Larvae in each test chamber were fed <24-hour-old *Artemia* (brine shrimp) three times per day. The test proceeded for seven days during which survival and water quality data were collected daily.

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SURVIVAL
Pimephales promelas

There was 100% survival to *P. promelas* in all of the effluent concentrations tested. Therefore, statistical analyses were not required to determine a no effect concentration.

LOEC: Not Applicable
NOEC: 100% Effluent

GROWTH
Pimephales promelas

P. promelas growth data were normally distributed at the 0.01 alpha level (0.900) using Shapiro Wilk's test for normality. Growth data were homogeneous using Bartlett's test at the 0.01 alpha level (15.09) without data transformations. Therefore, a parametric test was performed on the homogeneous data. Dunnett's test on *P. promelas* growth data demonstrated that there were no statistically significant differences between the control and any of the effluent concentrations.

LOEC: Not Applicable **PMSD: 10.0%**
NOEC: 100% Effluent

SUMMARY

There were no statistically significant differences between the control and the critical low flow concentration (100% effluent) for *C. dubia* survival and reproduction and *P. promelas* survival and growth. Based on biomonitoring requirements for Outfall 001 contained in Permit Number NPDES AR0022187 for Environmental Enterprise Group, City of Clarksville WWTP, Outfall 001 passed for this testing period.

Change of Mailing Address Form

Arkansas Department of Environmental Quality
Water Division – Permits
5301 Northshore Drive
North Little Rock, AR 72118-5317
P: 501-682-0656
F: 501-682-0910

RE: NPDES Permit No: AR 0022187 AFIN No: 36-00038

Name on Permit: Clarksville Light + Water

Responsible Official: Gregg Rainey

Phone: (479-979-5509 cell) (479-754-6241 EXT 302)

Please update facility mailing address to (If Applicable):

Address: _____

City: _____ State: _____ Zip: _____

Please update the Discharge Monitoring Reports (DMRs) Mailing Address to (If Applicable):

Name: _____

Address: _____

City: _____ State: _____ Zip: _____

Email (If Applicable): gregg.rainey@clarksvillelightwater.com

Sincerely,

Gregg Rainey
Signature (Responsible Official)

11-10-2015
Date



7013 2630 0000 6571 0144



ZIP 72830 \$ 007.89⁰
02 1W
0001370120 NOV. 10. 2015

CLARKSVILLE LIGHT & WATER CO.

400 WEST MAIN • P.O. BOX 1807
CLARKSVILLE, AR 72830
PHONE (479) 754-3148

To

ADEQ
Attn: Kyle Barber
5301 Northshore Drive
North Little Rock, AR 72118

