



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

May 21, 2019

Honorable Kevin A. Smith, Mayor
Helena Municipal Water & Sewer System
P.O. Box 248
Helena, AR 72342

RE: NPDES Permit Number: AR0043389, AFIN: 54-00083
Whole Effluent Toxicity Test Lab Error

Dear Mayor Smith:

The Department has conducted a review of the Whole Effluent Toxicity (WET) tests performed by American Interplex Corporation from September 2016 to January 2019. The review revealed that acute WET tests for *Pimephales promelas* and *Daphnia pulex* conducted for Outfall 001 during October 25, 2016, January 17, 2017, April 24, 2017, July 17, 2017, and October 30, 2017 as required by NPDES Permit No. AR0043389 (Permit) deviated from the 48-hour test duration specified in EPA-821-R-02-012. These tests have been deemed invalid.

Please correct the TX1-Q Discharge Monitoring Reports (DMRs) for December 31, 2016, March 31, 2017, June 30, 2017, September 30, 2017, and December 31, 2017 to reflect "NODI M – Laboratory Error" and attach this letter as your non-compliance report. These corrections should be made by June 1, 2019.

Reporting Laboratory Error on your DMR is a violation of Part I, Section A of your Permit. The Department has elected not to take formal enforcement action for these violations of your Permit.

Thank you for your attention to this matter. If you have questions or would like to discuss this matter further, please feel free to contact Leslie Allen-Daniel at 501-682-0630, or by e-mail at allen-daniel@adeq.state.ar.us.

Sincerely,

Richard Healey
Enforcement Branch Manager
Office of Water Quality

cc: Jack Ross, General Manager, HWH Water Dept (jross@hwhwater.com)
John Overbey, Laboratory Director, American Interplex Corporation
(joverbey@americaninterplex.com)