

From: [Rebecca Burkman](#)
To: [Jamie Belcourt \(adpce.ad\)](#); [Mikel Murders](#)
Cc: [Greg Ramon](#); [Jean Block](#); [Walter Collins](#); [Eric Wassell](#); [Jared Evanov](#); [Cornelius Jones](#); [Stacie Wassell \(adpce.ad\)](#); [David Ramsey \(adpce.ad\)](#); [Richard Healey \(adpce.ad\)](#)
Subject: Re: Little Rock Water Reclamation Authority's 2022 Pretreatment Program Report
Date: Wednesday, April 12, 2023 2:11:37 PM
Attachments: [image002.png](#)
[268407 \(005P-012\).pdf](#)

Ms. Belcourt,

I have received your comments regarding Little Rock Water Reclamation Authority's (LRWRA) January 1, 2022 – December 30, 2022 Pretreatment Program Annual Report (NPDES Permits AR0021806, AR0040177 & AR0050849).

LRWRA pretreatment staff will perform an investigation of our industrial users to determine if an industry is the source of the arsenic exceedance. Per our conversation on the phone, we will submit our findings in thirty (30) days.

Your second comment about cyanide and phenol detection levels is due to a clerical error on our part. LRWRA formerly performed these tests in-house, our detection levels were 3.5 ug/L cyanide and 3.9 ug/L phenols. Due to staffing issues, we now contract these tests to American Interplex (now Eurofins). The detection limits used by American Interplex are <0.01 mg/L cyanide and <0.005 mg/L phenols. The PAR reports in ug/L rather than mg/L, thus the detection limits are <10 ug/L cyanide and <5 ug/L phenols. The results reported are accurate; however, the *Detection Level Achieved (ug/L)* should have been updated to remove our in-house detection limits and replace them with American Interplex's detection limits. I am including an example of a lab report from American Interplex which contains their detection limits.

If you have any questions, please feel free to reach out to me or Mikel Murders, Pretreatment/Sampling Administrator.

Thank you,

Rebecca Burkman

Director of Environmental Affairs
11 Clearwater Dr.
Little Rock, AR 72204
Office: (501) 688-1486
www.lrwra.com



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From: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>

Sent: Thursday, April 6, 2023 9:32 AM

To: Mikel Murders <Mikel.Murders@lrwra.com>

Cc: Greg Ramon <Greg.Ramon@lrwra.com>; Jean Block <Jean.Block@lrwra.com>; Walter Collins <Walter.Collins@lrwra.com>; Rebecca Burkman <Rebecca.Burkman@lrwra.com>; Eric Wassell <Eric.Wassell@lrwra.com>; Jared Evanov <Jared.Evanov@lrwra.com>; Cornelius Jones <Cornelius.Jones@lrwra.com>; Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>; David Ramsey (adpce.ad) <David.E.Ramsey@adeq.state.ar.us>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>

Subject: RE: Little Rock Water Reclamation Authority's 2022 Pretreatment Program Report

Mr. Murders,

Little Rock Water Reclamation Authority's (LRWRA) January 1, 2022 – December 30, 2022 Pretreatment Program Annual Report (NPDES Permits AR0021806, AR0040177 & AR0050849) was received, reviewed, and deemed complete according to the reporting requirements of 40 C.F.R. § 403.12(i).

However, during review of the submitted report it was noted in the monitoring results section that the maximum allowable headworks concentration (MAHC) for arsenic was exceeded for two (2) quarters at the Adams Field WRF (AR0021806) and all four (4) quarters at the Fourche Creek WRF (AR0040177) during the reporting year. DEQ requests that LRWRA address the arsenic exceedances of the MAHC by investigating the cause of the high loading and identifying any noncomplying industries. Please provide a response detailing the LRWRA's investigation into the cause and documentation of any industrial user not in compliance.

Further, it was noted during review of this report that the detection level achieved for cyanide was 3.5 µg/L for all three (3) facilities. However, the results indicate <10.0 µg/L. Similar results were also noted for the detection level achieved for phenols, reporting that the detection level achieved was 3.9 µg/L but results showing <5.0 µg/L. Please also provide a response that addresses this issue.

If you have any questions, please feel free to reach out to me.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator

**Division of Environmental Quality | Office of Water Quality
Policy and Administration**

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0858 | c: 501.287.8714 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS

ENERGY & ENVIRONMENT

From: Mikel Murders [mailto:Mikel.Murders@lrwra.com]

Sent: Tuesday, March 28, 2023 10:58 AM

To: Pretreatment-Submittals

Cc: Greg Ramon; Jean Block; Walter Collins; Rebecca Burkman; Eric Wassell; Jared Evanov; Mikel Murders; Cornelius Jones

Subject: Little Rock Water Reclamation Authority's 2022 Pretreatment Program Report

Please see the attached copy of Little Rock Water Reclamation Authority's 2022 Annual Pretreatment Program Report for your review. If you have any questions or need any additional information please feel free to contact me.

Thank you,

Mikel Murders

Pretreatment/Sampling Administrator

1001 Temple St.

Little Rock, AR 72202

Office: (501) 688-1532

www.lrwra.com



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Little Rock Water Reclamation Authority
ATTN: Mr. Jared Evanov
9500 Birdwood Dr
Little Rock, AR 72206

This report contains the analytical results and supporting information for the sample received on August 26, 2022. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Chief Operating Officer or a qualified designee.

A handwritten signature in black ink that reads 'Steve Bradford'.

Steve Bradford
Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: Little Rock Water Reclamation Authority
ATTN: Mr. Jared Evanov
jared.evanov@lrwu.com



Little Rock Water Reclamation Authority
9500 Birdwood Dr
Little Rock, AR 72206

SAMPLE INFORMATION

Project Description:

One (1) water sample(s) received on August 26, 2022
005P-012

Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
268407-1	005P-012 B32-15, 16	26-Aug-2022	1

Notes:

1. Sample label was incomplete in regard to date/time of sampling

Case Narrative:

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
"Standard Methods for the Examination of Water and Wastewaters", (SM).
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).



Little Rock Water Reclamation Authority
9500 Birdwood Dr
Little Rock, AR 72206

ANALYTICAL RESULTS

AIC No. 268407-1

Sample Identification: 005P-012 B32-15, 16 26-Aug-2022

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Total Recoverable Phenolics EPA 420.1	< 0.005 Analyzed: 01-Sep-2022 0832 by 330	0.005	mg/l Batch: W80697	
Total Cyanide SM 4500-CN C,E 2016	< 0.01 Analyzed: 29-Aug-2022 1140 by 376	0.01	mg/l Batch: W80660	Prep: 29-Aug-2022 0923 by 376

Little Rock Water Reclamation Authority
9500 Birdwood Dr
Little Rock, AR 72206

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Recoverable Phenolics	0.1 mg/l	96.8	74.8-121			W80697		01Sep22 0832 by 330		
Total Cyanide	0.1 mg/l	89.6	81.9-118			W80660	29Aug22 0924 by 376	29Aug22 1128 by 376		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Recoverable Phenolics	268389-1	0.1 mg/l	95.7	62.0-123	W80697		01Sep22 0832 by 330		
	268389-1	0.1 mg/l	94.1	62.0-123	W80697		01Sep22 0832 by 330		
	Relative Percent Difference:		1.65	10.0	W80697				
Total Cyanide	268399-1	0.1 mg/l	91.4	65.2-124	W80660	29Aug22 0924 by 376	29Aug22 1131 by 376		
	268399-1	0.1 mg/l	85.0	65.2-124	W80660	29Aug22 0924 by 376	29Aug22 1133 by 376		
	Relative Percent Difference:		7.00	13.2	W80660				

LABORATORY BLANK RESULTS

Analyte	Result	RL	LOQ	QC Sample	Preparation Date	Analysis Date	Qual
Total Recoverable Phenolics	< 0.0050 mg/l	0.0050	0.005	W80697-1		01Sep22 0832 by 330	
Total Cyanide	< 0.0076 mg/l	0.0076	0.01	W80660-1	29Aug22 0924 by 376	29Aug22 1126 by 376	



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Misc Sampling 08-1
ENVIRONMENTAL ASSESSMENT DEPARTMENT
CHAIN OF CUSTODY RECORD

I.D. Number	Sample Number	Set-up Collection			Take-off Collection		
005P	012	Date	N/A	Time	N/A	Date	N/A
Monitoring Requested by:		<input checked="" type="checkbox"/> Protocol	<input type="checkbox"/> Retest	<input type="checkbox"/> Compliance	<input type="checkbox"/> Toxic Pollutant Scan	<input type="checkbox"/> Other (specify)	
Sampling Personnel Initials:		<input type="checkbox"/> RKS	<input checked="" type="checkbox"/> JBV	<input type="checkbox"/> BPR	<input type="checkbox"/> MLM	<input type="checkbox"/>	<input type="checkbox"/>
(If initials are not recorded, Print initials)							
SIGNATURE(S):		<i>J. B. [Signature]</i>					
<small>(Technicians will mark specific dates performed for sampling event)</small>		<input checked="" type="checkbox"/> Initiate Paperwork, <input checked="" type="checkbox"/> Collect Grab(s), <input type="checkbox"/> Collect Composite, <input type="checkbox"/> Field Analysis		<input type="checkbox"/> Initiate Paperwork, <input type="checkbox"/> Collect Grab(s), <input type="checkbox"/> Collect Composite, <input type="checkbox"/> Field Analysis		<input type="checkbox"/> Initiate Paperwork, <input type="checkbox"/> Collect Grab(s), <input type="checkbox"/> Collect Composite, <input type="checkbox"/> Field Analysis	
Type of Sample:		<input type="checkbox"/> Industrial Waste	<input type="checkbox"/> Plant Influent	<input checked="" type="checkbox"/> Final Effluent	<input type="checkbox"/> River Water	<input type="checkbox"/> Other (Specify) AFWRF	

Weather Conditions Current at Grab	Weather Conditions Current at Grab 2	Weather Conditions Current at Grab 3	Weather Conditions Current at Grab 4	Weather Conditions During 24 Hour Sampling Period
<input type="checkbox"/> Storm (heavy rain) <input type="checkbox"/> Rain (steady rain) <input type="checkbox"/> Showers (intermittent rain) <input type="checkbox"/> Overcast <input type="checkbox"/> Clear/Sunny <input type="checkbox"/> Cloudy <input checked="" type="checkbox"/> Cloudy (partly)	<input type="checkbox"/> Storm (heavy rain) <input type="checkbox"/> Rain (steady rain) <input type="checkbox"/> Showers (intermittent rain) <input type="checkbox"/> Overcast <input type="checkbox"/> Clear/Sunny <input type="checkbox"/> Cloudy <input checked="" type="checkbox"/> Cloudy (partly)	<input type="checkbox"/> Storm (heavy rain) <input type="checkbox"/> Rain (steady rain) <input type="checkbox"/> Showers (intermittent rain) <input type="checkbox"/> Overcast <input checked="" type="checkbox"/> Clear/Sunny <input type="checkbox"/> Cloudy <input type="checkbox"/> Cloudy (partly)	<input type="checkbox"/> Storm (heavy rain) <input type="checkbox"/> Rain (steady rain) <input type="checkbox"/> Showers (intermittent rain) <input type="checkbox"/> Overcast <input checked="" type="checkbox"/> Clear/Sunny <input type="checkbox"/> Cloudy <input type="checkbox"/> Cloudy (partly)	<input type="checkbox"/> Storm (heavy rain) <input type="checkbox"/> Rain (steady rain) <input type="checkbox"/> Showers (intermittent rain) <input type="checkbox"/> Overcast <input type="checkbox"/> Clear/Sunny <input type="checkbox"/> Cloudy <input checked="" type="checkbox"/> Cloudy (partly)

If applicable, record rain data obtained from LRW Seada System below:

Rain Total, Inches:	0.0	Rain Total, Inches:	0.0	Rain Total, Inches:	0.0	Rain Total, Inches:	0.0
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Definitions
Cloudy - When 7/8ths or more of the sky is covered by clouds.
Partly Cloudy - Between 3/8ths and 5/8ths of the sky is covered by clouds.
Overcast - Overcast sky conditions occur when clouds cause low visibility conditions. Although fog can cause low visibility on the ground, overcast skies are those higher in the atmosphere. Typically, individual clouds are not seen in an overcast sky.

Comments:



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Lot Identifier(s)	Sample Type		Record WWTW Flow for CN-, O&G, & Phenol Grabs	Preservative	Type: P/G	Sample Bottle Number	Parameter(s) Requested (Circle When Parameter Completed)	Designated Laboratory	Tag/Seal Verification	
	Composite	Grab Sample Date & Time								
1	NA	08/25/22 @ 9:40 am	11.13	preserved by contract lab	G	B32-11	Hg(I) (Grab 1)	AA	*-1 ✓	
2	NA	08/25/22 @ 2:04 pm	16.76	preserved by contract lab	G	B32-12	Hg(I) (Grab 2)	AA	*-1 ✓	
3	NA	08/25/22 @ 7:48 pm	18.98	preserved by contract lab	G	B32-13	Hg(I) (Grab 3)	AA	*-1 ✓	
4	NA	08/26/22 @ 6:11 am	15.97	preserved by contract lab	G	B32-14	Hg(I) (Grab 4)	AA	*-1 ✓	
5	4/24HFC	NA	**	**Ice, pH <2.00 w/conc. H ₂ SO ₄	G	B32-15	Total Phenolics	AA	*-1 ✓	
6	4/24HFC	NA	**	**Ice, pH >12.00 w/10N NaOH	P	B32-16	CN(I) Decolorized with Sodium Thiosulfate ^ <input type="checkbox"/> Yes, <input checked="" type="checkbox"/> No, <input type="checkbox"/> N/A; TRC ** mg/L CN- Tested for Sulfide: <input checked="" type="checkbox"/> Yes, <input type="checkbox"/> No, <input type="checkbox"/> N/A <input type="checkbox"/> Positive or <input checked="" type="checkbox"/> Negative	AI	✓	
7	NA	08/25/22 @ 9:40 am	11.13	**Ice, pH <2.00 w/conc. H ₂ SO ₄	G	B32-17	O&G (Grab 1)	LRWRA		
8	NA	08/25/22 @ 2:04 pm	16.76	**Ice, pH <2.00 w/conc. H ₂ SO ₄	G	B32-18	O&G (Grab 2)	LRWRA		
9	NA	08/25/22 @ 7:48 pm	18.98	**Ice, pH <2.00 w/conc. H ₂ SO ₄	G	B32-19	O&G (Grab 3)	LRWRA		
10	NA	08/26/22 @ 6:11 am	15.87	**Ice, pH <2.00 w/conc. H ₂ SO ₄	G	B32-20	O&G (Grab 4)	LRWRA		
Custody Transfer(s)										
1-4			J. B. ... 8-26-22 @ 12:16 pm			J. B. ... 8/26/22 12/16				
Custody Transfer-Lot Identifier(s)			Sample Relinquished By (Signature) Date & Time			Received By (Signature) Date & Time				
5, 6			Brady ... 8-26-22 1:49 pm			Brady ... 8-26-22 / 1349				
Custody Transfer-Lot Identifier(s)			Sample Relinquished By (Signature) Date & Time			Received By (Signature) Date & Time				
Custody Transfer-Lot Identifier(s)			Sample Relinquished By (Signature) Date & Time			Received By (Signature) Date & Time				
Custody Transfer-Lot Identifier(s)			Sample Relinquished By (Signature) Date & Time			Received By (Signature) Date & Time				
Note 1: The O&G adjusted pH was obtained as per instructions in EPA-821-R-10-001. ^ If sample decolorated, DPD method used to check for Chlorine. Comments: *-1 Each sample bottle is in a labeled bag, and the tag is verified, and placed on the outside of bag. To prevent possible low level Hg contamination, the individual bottle is not sealed. **See the attached flow bench sheet regarding the WWTW flow and preservation data for the individual aliquots composited.										
EAD Laboratory Personnel's Initials:			<input type="checkbox"/> LLI <input type="checkbox"/> LEH <input type="checkbox"/> RWB <input type="checkbox"/> JRE <input type="checkbox"/> DRM <input type="checkbox"/> HLF <input type="checkbox"/> JDV							
Sampling Personnel's Initials (Only if Not Checked on Front of C of G)			<input type="checkbox"/> RKS <input type="checkbox"/> JBV <input type="checkbox"/> BPR <input type="checkbox"/> BDD <input type="checkbox"/> MLM <input type="checkbox"/>							
Contract Lab Sample Custodian Name: (Print)			AMANDA ... DARBY BROWN							
Data Reviewed By: (Signature)			Data Reviewed:							
Sample Date(s):			N/A - N/A			Sample I.D. & No. 005P - 012			Classification <input type="checkbox"/> A <input checked="" type="checkbox"/> B <input type="checkbox"/> C	

2.3 °C