

Owned by the Citizens of Jonesboro

December 17, 2010

Mr. Rufus Torrence Arkansas Department of Environmental Quality 5301 North Shore Drive North Little Rock, AR 72118

RETURN RECEIPT CERTIFIED MAIL

Re: 2009-2010 Annual Pretreatment Status Report

Dear Mr. Torrence,

Enclosed is our 2009-2010 Annual Pretreatment Status report for NPDES permit #'s AR0043401 & AR0037907. This should satisfy the requirements stated in our NPDES Permit.

If more information is required, please contact my office at 870.930.3389.

Sincerely,

Myra Taylor

CWL Lab Supervisor



City Water & Light

400 E. Monroe Avenue PO Box 1289 Jonesboro, Arkansas 72403-1289

2009/2010 Pretreatment Program Status Report

NPDES #AR0043401

NPDES #AR0037907

Pretreatment Performance Summary (PPS)

Pretreatment Performance Summary (PPS)

Note: All questions refer to the Industrial Pretreatment Program <u>as approved</u> by the EPA. The permittee should not answer the questions based on changes made to the approved program without department authorization.

I. General Information

Control Authority Name:

City Water and Light Plant of the City of Jonesboro

Address:

400 East Monroe Avenue, P.O. Box 1289

City:

Jonesboro

State/ Zip:

Arkansas/ 72403-1289

Contact Person (Position):

Myra Taylor (Laboratory Supervisor/Pretreatment Coordinator)

Contact Telephone:

870.930.3389

E-mail:

mtaylor@jonesborocwl.org

NPDES Permit Numbers:

AR0037907 (Westside POTW) & AR0043401 (Eastside POTW)

Reporting Period

-Beginning Month and Year:

October 2009

-Ending Month and Year:

September 2010

Total Number of Categorical IUs:

7

Total Number of Significant Non-categorical IUs:

10

II. Significant Industrial User Compliance

| 1) Number of SIUs Submitting BMRs/ Total Number Required | <u>Significant</u> <u>Categorical</u> <u>NA</u> | Industrial Users Noncategorical N/A |
|--|---|---------------------------------------|
| Number of SIUs Submitting 90-Day Compliance Reports/ Number Required | <u>NA</u> | <u>N/A</u> |
| Number of SIUs Submitting Semiannual Reports/ Total Number Required | 00/00 | 00/00 |
| Number of SIUs Meeting Compliance Schedule/ Total Number Required to Meet Schedule | 01/01 | 00/00 |
| 5) Number of SIUs in Significant Noncompliance/ Total Number of SIUs | 00/07 | <u>00/10</u> |
| 6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) | 09 | <u>%</u> |

III. Compliance Monitoring Program

| | Significant | Industrial Users |
|--|--------------|------------------|
| | Categorical | Noncategorical |
| 1) Number of Control Documents Issued/ Total Number Required | <u>07/07</u> | <u>10/10</u> |
| 2) Number of Non-sampling Inspections Conducted | <u>07</u> | <u>10</u> |
| 3) Number of Sampling Visits Conducted | <u>20</u> | <u>1371</u> |
| 4) Number of Facilities Inspected (non-sampling) | <u>07</u> | <u>10</u> |
| 5) Number of Facilities Sampled | <u>07</u> | <u>10</u> |
| | | |

III. Enforcement Actions

| C. J. J. L. L. L. J. Marshov of Schedules Required | Significant Categorical 00/00 | Industrial Users Noncategorical 00/00 |
|---|-------------------------------|---------------------------------------|
| 1) Number of Compliance Schedules Issued/Number of Schedules Required | 00 | 04 |
| 2) Number of Notices of Violations Issued to SIUs | - - | — |
| 3) Number of Administrative Orders Issued to SIUs | <u>00</u> | <u>00</u> |
| 4) Number of Civil Suits Filed | <u>00</u> | <u>00</u> |
| 5) Number of Criminal Suits Filed | <u>00</u> | <u>00</u> |
| 6) Number of Significant Violators (attach newspaper publication) | <u>00</u> | <u>00</u> |
| 7) Amount of Penalties Collected (total dollars/ IUs assessed) | \$0.00/0 | <u>\$0.00/0</u> |
| 8) Other Actions (sewer bans, etc.) | <u>00</u> | <u>00</u> |

The following certification must be signed in order for this form to be considered complete: I certify that the information contained herein is accurate to the best of my knowledge.

Anthorized Representative

12/17/2010 Date **Updated Significant Industrial Users List**

| | | us Reports | Semi- Se | Annual Mon | N/A* N | N/A* | N/A* N | N/A* N | N/A* | N/A* | Z/A* | X **/N | - | + | N/A* | N/A* N | N/A* N | N/A* | N/A* | N/A* | *** | + | N/A* | | |
|---|---|---------------------------|--------------|---------------|-----------------|---------------------|------------------------|-----------------|-----------------|-----------------|------------------|--------------------|----------------|-------------------|------------------------------|---------------------|-----------------|---------------|------------------|-----------------|--|---------------------------|---------------------|----------------------------|-----|
| | | Compliance Status Reports | | _ | | - | | _ | _ | - | \vdash | + | \dagger | | | | _ | | _ | \vdash | + | + | N/A* | | |
| | İ | Com | 90-Day | R Compliance | * N/A* | * N/A* | *\/\X | *W* | | | | | | *A/N | *\ N/A* | * N/A* | ** N/A* | | | | | | | | |
| | | | | BMR | N/A* | N/A* | *\/X | *VN | *V/N | *V | *∀/N | **/14 | Ž | *VA | N/A* | N/A* | N/A* | *A/N | *V/N | *V/V | | N/A* | N/A* | 1-1/A 2-1/2 | |
| | | | Times | Sampled | | " | | 1 | , " | 7 | , , | 1 5 | 55 | 3 | 2 | 53 | 365 | | 398 | 370 | 262 | 155 | S | 1391 | |
| ist | | | Times | Inspected | | - | . | <u> </u> | | - | - - | - - | - | - | 1 | | , | 4 7 | - - | - - | - | 1 | 1 | 17 | |
| Sers L | | | New | User | ž | 2 2 | | 2 2 | NI | | ON F | ON! | ĝ | No | Ñ | Ž | 2 2 | ONI V | | | 0N | % | ž | | |
| ndustrial U | | Control Document | | Action | 10/1/0109 | 70007 | 7/1/2007 | 11/1/2007 | 11/1/2007 | 0/1/7010 | 6/1/2008 | 7/1/2010 | 9/1/2004 | 10/1/2009 | 12/1/2005 | 80000000 | 9/3/0/2/000 | 6/4/2006 | 7/1/2007 | 7/1/200/ | 5/18/2009 | 1/28/2008 | 10/15/2009 | | |
| icant L | | Control | | NA | Y 7/ 7 | 7 | <u> </u> | X X | , , | × | Y ; | <u> </u> | X | X | > | , | 1 2 | × ; | , | 7 | Y | Ā | > | | |
| Updated Significant Industrial Users List | | | 100,1000,000 | Determination | Беспинации | Metal Finishing | Metal Finishing | Metal Finishing | Metal Finishing | Metal Finishing | Metal Finishing | Metal Finishing | Food Products | Printing | Denote December | rapei Froducia | Food Froducts | Food Products | Auto & Laundries | Food Products | Food Products | Perfirmes Cosmetics, Etc. | Downwoo Compile Etc | FCI (MIIICS) COMMONO, TOO. | |
| | - | | Ç |) s (| Code | 3429 | 3469 | 3535 | 3499 | 3644 | 3646 | 3648 | 2044 | 2752 | 7617 | 507 | 2013 | 2043 | 7218 | 5096 | 2099 | 2844 | 107 | 7944 | |
| | | | | | ╗ | 8402 | 8409 | 8413 | 8702 | 9502 | 9801 | 10001 | 8408 | 0414 | 4114 | 8901 | 9101 | 9302 | 10/6 | 9702 | 10205 | 10001 | 10001 | 10811 | |
| | | | | | Industrial User | Colson Casters Corp | Delta Cons. Industries | Hytrol Conveyor | Farr Company | Thomas & Betts | Trinity Lighting | IV Droducts & Serv | JAN HOURS WOLL | Riceland Foods*** | World Color (Quebecor World) | International Paper | Butterball LLC. | Post Foods | G & K Services | Frito. I av Inc | 1.11.0 Dec 1.1. The second of Doors ** | Nestie Frepared Foods | Alberto Culver*** | Nice-Pak Products | NOS |

NC(Cadmium)

N/A* N/A*

Ö

N/A* N/A*

N/A*

NC(FOG)

N/A*

N/A*

NC(FOG)

N/A* N/A* NC(FOG) ပ Ö

N/A*

N/A*

Permit Limits

Monitoring

Pretreatment Program Status Report

N/A* N/A*N/A* N/A*

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* CWL Performs All Monitoring For This IU.

 ** Riceland Foods is operating under an Interim Permit which expires 12/31/10.

*** Nestle Prepared Foods Foods is operating under an Interim Permit which expires 1/31/11.

**** Alberto Culver is operating under an Interim Permit which expires 12/21/10.

**** CWL currently has 34 permitted, yet Non- Significant Carwashes.

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| | | | Pretreatmen Updated Signii | t Program Status Report ficant Industrial Users List | us Repor I Users I | t .ist | | | | : | : | | |
|--|------------------|---------|---|---|-----------------------|---------------|---------|----------------|---------------------------|-------------|------------|---------------|---|
| | | | | | | | | | | | | | |
| | | | | Common of London | * | | | | Compliance Status Reports | Stafus Repo | rts | 12.81 | |
| | | Ç | Cotenanical | Control Document | New | Times | Times | | 90-Day | Semi- | Self- | | |
| Industrial User | Permit Number | Sic | Determination | Y/N Action | User | Inspected | Sampled | BMR | Compliance | Annual | Monitoring | Permit Limits | |
| Categorical | | | | | ŀ | | | * 1/1 | X1/4* | **/\% | M/A* | C | |
| Colon Corters Orth | 8402 | 3429 | Metal Finishing | Y 10/1/2009 | - | | | N/A | W. A. | *4/14 | N/A* | C | |
| Dolto Cone Industries | 8409 | 3469 | Metal Finishing | Y 7/1/2007 | \dashv | | | N/A | N/A* | **/17 | X//X |) U | |
| Della Collis, industrio | 8413 | 3535 | Metal Finishing | Y 7/1/2007 | - | I | | N/A | 14/A | **/\ | **/\ | O | |
| nyuoi conveyor | 2707 | 3499 | Metal Finishing | Y 11/1/2007 | No No | Ţ | | N/A | A/A | 14/7 | X 7/1 X | | |
| Farr Company | 9502 | 3644 | Metal Finishing | Y 6/1/2010 | \dashv | 1 | | *W/W | *\N\ | N/A* | N/A* | ی د | |
| I HOHIAS & Deus | 9801 | 3646 | Metal Finishing | Y 6/1/2008 | oN N | | | N/A* | N/A: | W/A | *V/IV | | |
| 1 rmity Lighting | 10001 | 3648 | Metal Finishing | Y 7/1/2010 | No | 1 | | N/A* | N/A* | N/A" | N/A. |) | |
| JK Products & Services | TOOOT | 2 | | | | 7 | 20 | | | | | | |
| SUM | | | | | | | | | | | | | |
| Ordinance | | | | ╁ | + | , | | N1/A* | N/A* | N/A* | N/A* | C | |
| Disology Roods* | 8408 | 2044 | Food Products | Y 9/1/2004 | 4 | | | 17/71 | AT/A * | N./. | *\/N | NC(Cadmium) | |
| Nicelatiu Foods | 8414 | 2752 | Printing | Y 10/1/2009 | 9 No | - | 3 | N/A* | N/A" | N/A | 1027 | | |
| World Color (Quebecot world) | 1000 | 8001 | Paner Products | Y 12/1/2005 | 5 No | 1 | 2 | N/A* | N/A* | N/A* | IN/A |) LOBOT & | |
| International Paper | 0301 | 2012 | Food Products | Y 9/30/2008 | No No | ī | 53 | N/A* | N/A* | N/A* | N/A* | NC(FOG) | |
| Butterball LLC. | 9101 | 50.02 | Took I vouse | 1 | ╀ | 1 | 365 | N/A* | N/A* | N/A* | N/A* | ی | |
| Post Foods | 9302 | 2043 | Food Froducts | + | ╁ | | Ş | N/A* | N/A* | N/A* | N/A* | NC(FOG) | |
| G & K Services | 9701 | 7218 | Auto & Laundries | ╁ | + | · - | 365 | *V/N | *\/\Z | N/A* | N/A* | ပ | |
| Frito-Lay Inc. | 9702 | 2096 | Food Products | ┪ | + | - - - | 300 | * 4/1/ | *4/12 | N/A* | *\/N | NC(FOG) | |
| Morte Drenared Foods*** | 10205 | 2099 | Food Products | + | 4 | -{ -, | 202 | 17/71 71/74 | N1/A* | *V/IV | *\/\ | C | |
| ************************************** | 10801 | 2844 | Perfumes, Cosmetics, Etc. | Y 1/28/2008 | | _ | ccı | N/A | C/NI | 11/A* | *Y/1V | | _ |
| Alberio Cuivei | 10811 | 2844 | Perfumes Cosmetics, Etc. | Y 10/15/2009 | 00 No | 1 | 5 | N/A* | N/A* | N/A | Y/Y | | |
| Nice-Pak Products | 10011 | 107 | | | | 10 | 1371 | | | | | | |
| SUM | | | | | | | | | | | | | |
| | * CWL. | erforms | * CWL Performs All Monitoring For This IU | | | | | | | | | | |

* CWL Performs All Monitoring For This IU.

*** Nestle Prepared Foods is operating under an Interim Permit which expires 1/31/11.
**** Alberto Culver is operating under an Interim Permit which expires 12/21/10.
***** CWL currently has 34 permitted, yet Non- Significant Carwashes.

Significant Violations Enforcement Actions Taken

Attachment B

Significant Violations - Enforcement Actions Taken

| | Material | Month of Violation | | Numbe | Number of Actions Taken | 3 Taken | | Penalties | Com | Compliance Schedule | Current | |
|---|--------------|--------------------|---------------|-----------|-------------------------|--|------------|-----------|-------------|---------------------|----------|----------|
| | וגפומום | TOTAL T | 707 | < | Civil | Criminal | Officer | Collected | Date Issued | Date Due | Status | Comments |
| Industrial User | Reports | 2 | 2.5 | 2 | 5 | | П | 000 | | 14/5/2000 | | # |
| Thomas 2 Botte | _ | _ | 0 | 0 | 0 | | _ ⊃ | 30.00 | 9/ 10/2009 | 100000 | ,,, | **** |
| Hollids & Dates | | 7 | + | c | ح | c | С | 80.00 | Υ× | N/A | <u>ن</u> | N/A |
| Butterball L.C. | ⇒ — | ב | _ | 2 | , | | | 00.00 | 41.7 | A) IA | | A/N |
| 001/001/000 | ٥ | SO I | - | _ | 0 | _ | > | 20.00 | A/A | L/M | > | |
| GRY VELVICES | > | 3 | | , | | | | 0000 | VIV | VIN | ٢ | ۷/Z |
| 10000 | _ | C. | | _ | 0 | | > | 20.52 | Y.Y. | TANK! | , | |
| Nessie | | 3 | | | , | | | 00 00 | VIV | N/A | <u></u> | ĕ/Z |
| World Color | 0 | Cadminm | _ | 0 | 5 | 2 | | 90.00 | 1407 | | | |
| | 100 | S of oron | nificate No | an-Comple | ance herw | Non-Compliance between 9/22/09 - 9/21/10. | 9-9/21/ | 10. | | | | |
| . No CWL permitted illuastiles were in Semillare | | MCIC III 78 | יווווירם זכן | | , , | | | 4 | | | | |
| **Thomas & Reffs initiated a compliance schedule to install | ed a comoli. | ance schedu | le to install | a new sam | oling tacility | I a new sampling facility to meet CVVL requirements. | ı requiren | rents. | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

Newspaper Notice of Significant Violators

Monitoring Results For the Annual Pretreatment Report

Monitoring Results For The Annual Pretreatment Report Reporting Year: October 1, 2009 To September 30, 2010 Treatment Plant: City Water & Light Eastside NPDES Permit # AR0043401 Average Flow: 7.304 MGD % IU Flow 22.25%

| | | Influent Dates | s Sampled | | | | Effluent Dates Sampled | es Sampled | | | aboratory Analysis | lysis |
|----------|--------------|----------------|-----------|----------|-----------|----------|------------------------|------------|----------|--------|--------------------|-----------|
| | | (ua/L | | | | | (ng/L) | | | | EPA | Detection |
| | | Ouce/Or | uarter | | WQ Level/ | | Once/Quarter | luarter | | MQL | Method | Level |
| | | | | | Limit | | | | | (ng/L) | pesn | Achieved |
| Date | 1 | Date | Date | Date | (ng/L) | Date | Date | Date | Date | | | MQL |
| 10/20/09 | 1 | 2/9/10 | 5/11/10 | 8/17/10 | | 10/22/09 | 2/11/10 | 5/13/10 | 8/19/10 | | • | (ng/L) |
| 1.61 | | 0 | 0 | 0 | N/A | 0 | 0 | 0 | 0 | 60.0 | 200.8 | 0.09 |
| 0.444 | _ | o | 0 | 0 | 3.99 | 0 | 0 | 0 | 0 | 0.5 | 200.8 | 0.5 |
| 6.66 | _ | 20.4 | 36.9 | 61.0 | 29.475 | 3.67 | 3.85 | 4.19 | 4.70 | 0.5 | 200.8 | 0.5 |
| 5.79 | | 1.56 | 3.40 | 1.89 | 11.7 | 0 | 0.796 | 0 | 0 | 0.5 | 200.8 | 0.5 |
| 0.626 | ب | 0.173 | 0.261 | 0.153 | 0.013 | 0.00238 | 0.00203 | 0 | 0 | 0.005 | 1631E | 0.005 |
| 8.94 | | 3.36 | 4.08 | 5.09 | 322.655 | 2.64 | 1.48 | 1.87 | 2.09 | 0.5 | 200.8 | 0.5 |
| 0 | | 0 | 0 | 0 | 5.58 | 0 | 0 | 0 | 0 | 5.0 | 200.8 | 5.0 |
| 5.23 | L | 1.69 | 2.97 | 0 | 6.905 | 0 | 0 | 0 | 0 | 0.5 | 200.8 | 0.5 |
| 1080 | L | 75.8 | 124 | 148 | 281.872 | 38.7 | 46.5 | 0.99 | 54.6 | 20.0 | 200.8 | 20.0 |
| 6.74 | L | 0 | 0 | o | 816.848 | 2.27 | 0 | 0 | 0 | 10.0 | 200.8 | 10.0 |
| 0 | L | 0 | 0 | 0 | 5.803 | 0 | 0 | 0 | 0 | 10.0 | 4500CNE | 10.0 |
| 1.29 | L | 1.28 | 1.35 | 0 | ΑN | 1.81 | 986.0 | 0 | 0.569 | 0.5 | 200.8 | 0.5 |
| 17.8 | | 4.42 | 10.6 | 14.3 | ΝΆ | 5.67 | 4.72 | 10.9 | 12.0 | İ | 200.8 | 1.0 |
| 0 | ┺ | 0 | 7.0 | 0 | N/A | 0 | 0 | 0 | 0 | 5.0 | 420.1 | 5.0 |
| 0 | - | 0 | 0 | 0 | N/A | 0 | 0 | 0 | 0 | 0.5 | 200.8 | 0.5 |
| 0 | - | 0 | 0 | 0 | N/A | 0 | 0 | 0 | 0 | 0.5 | 200.8 | 0.5 |
| 6.482 | - | 7.781 | 7.976 | 6.556 | N/A | 19.276 | 7.946 | 7.133 | 6.759 | 1 | 1 | - |
| | | 0.0731 | | | | | 0 | | | | 608 | |
| | | 484 | | | | | 485 | | | | 625 | |
| 12/02/09 | i 1— | 03/04/40 | 06/08/10 | 08/23/10 | | 12/04/09 | 03/03/10 | 06/10/10 | 08/25/10 | | | |
| _i | _i | | - | | | | | | | | | |

Monitoring Results For The Annual Pretreatment Report Reporting Year: October 1, 2009 To September 30, 2010
Treatment Plant: City Water & Light Westside NPDES Permit # AR0037907
Average Flow: 1.7735 MGD % IU Flow 19.13%

| | Ĕ | | Ď | | | | ٦ | | | | | | | | | | T | ٦ | - | | | |
|------------------------|-----------|---------------|----------|---------|----------|----------|--------|----------|--------|-----------------------------------|---------|----------|-----------|---------|----------|---------|---------|------------|---------|----------|----------|-----------|
| lysis | Detection | Leve | Achieved | MQL | (ng/L) | 0.09 | 0.5 | 0.5 | 0.5 | 0.005 | 0.5 | 5.0 | 0.5 | 20.0 | 10.0 | 10.0 | 0.5 | 0. | 5.0 | 0.5 | 0.5 | |
| Laboratory Analysis | EPA | Method | pesn | | | 200.8 | 200.8 | 200.8 | 200.8 | 1631E | 200.8 | 200.8 | 200.8 | 200.8 | 200.8 | 4500CNE | 200.8 | 200.8 | 420.1 | 200.8 | 200.8 | - |
| Lab | EPA | MQL | (ng/L) | | | 0.09 | 0.5 | 9.0 | 9.0 | 0.005 | 9.0 | 5.0 | 0.5 | 20.0 | 10.0 | 10.0 | 0.5 | | 5.0 | 0.5 | 0.5 | |
| | | | | Date | 9/16/10 | 0 | 0 | 9.72 | 0 | ment D | 3.70 | 0 | 0 | 20.8 | 0 | 0 | 0 | 4.49 | 35.0 | 0 | 0 | 1.3836 |
| es Sampled | (T) | λuarter | | Date | 6/3/10 | 0 | 0 | 12.8 | 0.594 | See Attachi | 3.25 | 0 | 0 | 27.7 | 0 | 0 | 2.65 | 4.07 | 0 | 0 | 0 | 1.2179 |
| Effluent Dates Sampled | (ng/L) | Once/Quarter | | Date | 2/11/10 | 0 | 0 | 5.47 | 0.736 | *Mercury Results See Attachment D | 3.0 | 0 | 0 | 26.2 | 0 | 0 | 2.65 | 2.12 | 0 | 0 | 0 | 1.908 |
| | | | | Date | 10/22/09 | 0 | 0 | 8.62 | 1.59 | *Mercui | 3.13 | 0 | 0 | 21,4 | 3.89 | 0 | 5.12 | 5.78 | 0 | 0 | 0 | 6.241 |
| | • | WQ Level/ | Limit | (nd/L) | ` | N/A | 3.99 | 29.475 | 11.7 | 0.013 | 322.655 | 5,58 | 6.905 | 281.872 | 816.848 | 5,803 | N/A | A/N | N/A | N/A | N/A | N/A |
| | | | | Dafe | 9/15/10 | 0 | 0 | 34.1 | 6.0 | ment D | 5.95 | 0 | 0 | 96.0 | c | 0 | 7.32 | 4,93 | 74.0 | 0 | 0 | 1.4737 |
| Sampled | | L, Juarter | | Date | 6/2/40 | c | C | 39.7 | 3.54 | *Merciny Results See Affachment D | 4.03 | C | C | 88.0 | 0 | 0 | 2.29 | 2.61 | 0 | С | 0 | 1.1437 |
| below Sampled | (1/01) | Once/Origin | 5 | Date | 2/10/10 | | C | 16.6 | 3.50 | v Results | 4.10 | C | c | 62.7 | | 0 | 3.20 | 2.17 | С | C | 0 | 1.947 |
| | - | | | Date | 10/21/00 | 2017 | 0 355 | 31.6 | 4 19 | *Merci | 6 62 | 200 | 0 190 | 87.7 | 4 60 | 2 | 6.31 | 6.01 | C | | | 1.263 |
| | MAHC | | 1 | | -1 | VIN | 120 | 414.0 | 85.0 | 0.026 | 250.0 | 12.0 | 0.35 | 323.0 | 4000 | 14.0 | 39.0 | 83.0 | 40000 | N/A | Δ/N | N/A |
| Motolo | Overals, | Cyallide and | (Total) | (10tal) | | Antimopy | Codmin | Countien | COpper | Moroun | Niekol | Solonium | Odicilium | Silvei | Chromium | Cyanida | Areanic | Mohybdenim | Dhonole | Dondlinm | Thallium | Flow, MGD |

ATTACHMENT D

MERCURY SOURCE INVESTIGATION & POTW EFFLUENT TESTING TIMELINE WESTSIDE WASTEWATER TREATMENT PLANT CITY WATER & LIGHT JONESBORO (CWL)

Prepared for: Arkansas Department of Environmental Quality

Prepared by: City Water & Light Jonesboro (CWL)

Date: June 22, 2010

RE: NPDES Permit No. AR0037907

POTW Effluent Mercury Results of Concern Elimination of Identified Mercury Sources POTW Effluent Mercury Results Substantiating Source Elimination

| DESCRIPTION OF EVENT | DATE |
|---|----------------------|
| First high analytical result for effluent mercury at West WWTP of 21.4 ppt. | June 5, 2008 |
| Sampled mercury content of septic hauler discharge to West Plant influent (1240 ppt). | July 1, 2008 |
| Re-sampled septic hauler discharge to West Plant influent (3460 | November 6, 2008 |
| ppt). Septic tank waste identified as a significant source of mercury for the West WWTP. Discontinued acceptance of septic tank waste at the West WWTP. | October 23, 2009 |
| Sampled mercury content of potable water (29.3 ppt) at the CWL Johnson Pumping Station (potable water treatment plant). | November 3, 2009 |
| Re-sampled septic hauler waste temporarily discharging to Eastside WWTP for further mercury content confirmation (12,220 and 479 ppt, respectively). | November 4 & 6, 2009 |
| Began first 20-Sample Effluent Mercury Study of West Plant. | November 20, 2009 |
| Received high effluent results for December 16, 2009 (12.0 ppt). | January 19, 2010 |
| Re-sampled potable water at the Johnson Pumping Station (tap, 46.80 ppt and raw, 48.50 ppt). Also sampled water (tap only) at the three other potable water treatment plants with the potential to supply CWL customers discharging sanitary sewer to the West WWTP. Results are shown on spreadsheet enclosed. | January 28, 2010 |
| Received high effluent results for December 22, 2009 and January 15, 2010 (12.0 ppt & 12.9 ppt, respectively). | February 16, 2010 |
| Re-sampled potable water (tap and raw) at the three other in-town potable water treatment plants. Also sampled the two groundwater wells in service at the Johnson Pumping Station (Well #3, 75.07 ppt and Well #4, 16.94 ppt). Results are shown on enclosed spreadsheet. | February 19, 2010 |
| Johnson Pumping Station identified as a significant source of mercury for the West WWTP. Discontinued use of Johnson. | February 19, 2010 |

| DESCRIPTION OF EVENT | DATE |
|--|------------------------|
| Pumped remaining treated potable water from Johnson Pumping Station clearwells out into the water distribution system. | February 25, 2010 |
| Began second 20-Sample Effluent Mercury Study of West Plant. | March 23, 2010 |
| Sampled potable water around Riceland's manufacturing facility | April 9, 2010 |
| (used the fire hydrants within the Riceland compound). Also, | |
| sampled at the water meter supplying Riceland's Pretreatment | |
| Plant. See enclosed spreadsheet and CWL water distribution map | |
| for details. | |
| Received high effluent results for April 6, 2010 (12.6 ppt). | April 22, 2010 |
| Sampled water in Johnson East & West Clearwells (filled with | April 27, 2010 |
| water from the distribution system), 15.59 ppt & 9.88 ppt, | |
| respectively. Confirmation of low mercury content before usage. | |
| Flushed northwest quadrant of CWL's potable water distribution | April 28, 29, & 30 and |
| system (area of customer contribution to West WWTP). | May 1 & 2, 2010 |
| Purged northwest quadrant of CWL's potable water distribution | May 3 & 5 – 10, 2010 |
| system through a low gpm flush. | |
| Drained approximately 75' of the Madison & Strawn tank (CWL's | May 7 & 8, 2010 |
| primary potable water storage tank for the northwest quadrant of | |
| the city). | |
| Filled Madison & Strawn. | May 9 & 10, 2010 |
| Re-sampled potable water around Riceland's manufacturing facility | May 13, 2010 |
| (used the fire hydrants within the Riceland compound). Also, re- | |
| sampled at the water meter supplying Riceland's Pretreatment | |
| Plant. See enclosed spreadsheet and CWL water distribution map | |
| for details | |
| Began second round of West Plant Study (March 23 rd start date). | May 17, 2010 |
| Received three non-detect mercury results for West Plant effluent. | June 1, 2010 |
| Received three non-detect mercury results for West Plant effluent. | June 11, 2010 |
| Instructed by Mo Shafii, ADEQ, to discontinue mercury sampling | June 11, 2010 |
| at the West Plant and to submit data with a time-line for evaluation. | |
| CWL continuing the evaluation of potential mercury sources within | Present |
| the West WWTP service area. | |

WEST PLANT 20 WEEK STUDY - #1

Ark. Mercury WQ standard of 0.012 ppb (or 12 ppt)

| SAMPLE DATE | W. EFF. | W. INF. | EPA Method Used | MQL Achieved |
|-------------|---------|---------|-----------------|--------------|
| 11/20/09 | 9.88 | | 1631E | <5.0 |
| 11/23/09 | 11.5 | | 1631E | <5.0 |
| 12/03/09 | | 67.7 | 1631E | <5.0 |
| 12/04/09 | 8.57 | | 1631E | <5.0 |
| 12/10/09 | | 41.6 | 1631E | <5.0 |
| 12/11/09 | 9.82 | | 1631E | <5.0 |
| 12/15/09 | | 84.4 | 1631E | <5.0 |
| 12/16/09 | 12.0 | | 1631E | <5.0 |
| 12/21/09 | | 46.7 | 1631E | <5.0 |
| 12/22/09 | 12.0 | | 1631E | <5.0 |
| 12/28/09 | | 43.7 | 1631E | <5.0 |
| 12/29/09 | 9.72 | | 1631E | <5.0 |
| 01/07/09 | | 50.7 | 1631E | <5.0 |
| 01/08/09 | 10.6 | | 1631E | <5.0 |
| 01/14/09 | | 51.8 | 1631E | <5.0 |
| 01/15/09 | 12.9 | | 1631E | <5.0 |
| 3/4/2010 | | 46.6 | 1631E | <5.0 |
| 3/8/2010 | | 49.4 | 1631E | <5.0 |
| 3/17/2010 | | 35.6 | 1631E | <5.0 |

WEST PLANT 20 WEEK STUDY - #2

Ark. Mercury WQ standard of 0.012 ppb (or 12 ppt)

| SAMPLE DATE | W. EFF. | W. INF. | EPA Method Used | MQL Achieved |
|-------------|---------|---------|------------------------|--------------|
| 3/23/2010 | 8.5 | 28.9 | 1631E | <5.0 |
| 3/24/2010 | 5.4 | | 1631E | <5.0 |
| 3/26/2010 | 6.0 | | 1631E | <5.0 |
| 3/29/2010 | 9.8 | | 1631E | <5.0 |
| 3/30/2010 | 7.7 | 35.1 | 1631E | <5.0 |
| 3/31/2010 | 6.0 | | 1631E | <5.0 |
| 4/6/2010 | 12.76 | 26.2 | 1631E | <5.0 |
| 4/7/2010 | 5.27 | | 1631E | <5.0 |
| 4/9/2010 | 7.0 | | 1631E | <5.0 |
| 4/14/2010 | 7.64 | 78.4 | 1631E | <5.0 |
| 4/15/2010 | 7.86 | | 1631E | <5.0 |
| 4/16/2010 | 7.50 | | 1631E | <5.0 |
| 5/17/2010 | 0 | | 1631E | <5.0 |
| 5/18/2010 | 0 | | 1631E | <5.0 |
| 5/19/2010 | 0 | 16.7 | 1631E | <5.0 |
| 5/26/2010 | 0 | | 1631E | <5.0 |
| 5/27/2010 | 0 | 21.3 | 1631E | <5.0 |
| 5/28/2010 | 0 | | 1631E | <5.0 |
| 8/24/2010 | | 47.5 | 1631E | <5.0 |
| 8/25/2010 | 7.83 | | 1631E | <5.0 |

FIELD MERCURY RESULTS (ppt) 2010

Ark. Mercury WQ standard of 0.012 ppb (or 12 ppt)

| SAMPLE DATE | Results | EPA Method Used | MQL Achieved | Manhole # |
|------------------------|----------------|-----------------|--------------|--|
| 02/02/10 | 185 | 1631E | <5.0 | MH 04-35 (Madison & Burke) |
| 02/02/10 | 345 | 1631E | <5.0 | MH 04-29 (Flint & Burke) |
| | 49.8 | 1631E | <5.0 | MH 04-17 (Burke&Vine) |
| 02/16/10 02/16/10 | 95.0 | 1631E | <5.0 | MH 04-20 (Burke&Olive) |
| 02/10/10 | 50.8 | 1631E | <5.0 | MH 04-95 (Huntington&Sharp) |
| 02/10/10 | 43.3 | 1631E | <5.0 | MH 04-96 (Huntington&Flint) |
| 02/22/10 | 120.0 | 1631E | <5.0 | MH 04-35 (Madison & Burke) |
| 02/22/10 | 124.0 | 1631E | <5.0 | MH 04-29 (Flint & Burke) |
| 3/1/2010 | 183 | 1631E | <5.0 | Fairview&Fairfield |
| 3/4/2010 | 48.5 | 1631E | <5.0 | Oak&Chestnut |
| 3/19/2010 | 15.8 | 1631E | <5.0 | MH 01-18 (Hanley & Johnson) |
| 3/19/2010 | 6.8 | 1631E | <5.0 | MH 12-55 Sports Complex |
| 3/19/2010 | 46.1 | 1631E | <5.0 | MH 01-09 Gee & Dan |
| | 22.9 | 1631E | <5.0 | MH 01-33 (Lost Creek North of Generator Site) |
| 4/1/2010 5/4/2010 | 11.1 | 1631E | <5.0 | MH 12-55 Sports Complex |
| | 29.0 | 1631E | <5.0 | MH 12-55 Sports Complex |
| 5/5/2010 | 46.4 | 1631E | <5.0 | MH 12-55 Sports Complex |
| 5/6/2010 | 227.0 | 1631E | <5.0 | MH 04-35 (Madison & Burke) |
| 5/3/2010 | 56.1 | 1631E | <5.0 | MH 04-29 (Flint & Burke) |
| 5/3/2010 | 187.0 | 1631E | <5.0 | MH 04-24 (McClure & Burke) |
| 4/30/2010 | | 1631E | <5.0 | MH 05-56 (W. Washington & Meadowbrook) |
| 4/30/2010 | 38.6 | 1631E | <5.0 | MH 05-185 (Hester & Apple) |
| 4/30/2010 | 123.0 | 1631E | <5.0 | MH 07-2 (1324 Western) |
| 4/30/2010 | 150.0 10.2 | 1631E | <5.0 | MH 06-3 (1208 Nettleton Circle) |
| 5/13/2010 | | 1631E | <5.0 | MH 01-18 (Hanley & Johnson) |
| 5/11/2010 | 12.9 12.9 | 1631E | <5.0 | MH 01-18 (Hanley & Johnson) |
| 5/12/2010 | 12.8 | 1631E | <5.0 | MH 01-18 (Hanley & Johnson) |
| 5/13/2010 | 34.3 | 1631E | <5.0 | MH 01-65 (Gee & Dan) |
| 5/4/2010 | 550.0 | 1631E | <5.0 | MH 01-65 (Gee & Dan) |
| 5/5/2010 | 67.7 | 1631E | <5.0 | MH 01-65 (Gee & Dan) |
| 5/6/2010 | 16.3 | 1631E | <5.0 | MH 01-33 (Lost Creek North of Generator Site) |
| 5/11/2010 | 17.2 | 1631E | <5.0 | MH 01-33 (Lost Creek North of Generator Site) |
| 5/12/2010 | 22.9 | 1631E | <5.0 <5.0 | MH 01-33 (Lost Creek North of Generator Site) |
| 5/13/2010 | 58.1 | 1631E | <5.0 | MH 04-71 (Madison & W. Huntington) |
| 5/11/2010 | 38.1 | 1631E | <5.0 | MH 04-71 (Madison & W. Huntington) |
| 5/12/2010 5/13/2010 | 98.1 | 1631E | <5.0 | MH 04-71 (Madison & W. Huntington) |
| 5/14/2010 | 86.0 | 1631E | <5.0 | MH 04-71 (Madison & W. Huntington) |
| 5/11/2010 | 3840.0 | 1631E | <5.0 | MH 04-38 (Madison at R/R) |
| | 102.0 | 1631E | <5.0 | MH 04-38 (Madison at R/R) |
| 5/12/2010 | | 1631E | <5.0 | MH 04-38 (Madison at R/R) |
| 5/13/2010 | 175.0 185.0 | 1631E | <5.0 | MH 04-38 (Madison at R/R) |
| 5/14/2010 | 20.1 | 1631E | <5.0 | MH 04-57 (314 Union) |
| 5/11/2010 | 1130.0 | 1631E | <5.0 | MH 04-57 (314 Union) |
| 5/12/2010 | | 1631E | <5.0 | MH 04-57 (314 Union) |
| 5/13/2010 | 30.1 | 1631E | <5.0 | MH 04-57 (314 Union) |
| 5/14/2010 | | 1631E | <5.0 | MH 05-2 (R/R East of Gee St) |
| 5/4/2010 5/5/2010 | 30.6 53.1 | 1631E | <5.0 | MH 05-2 (R/R East of Gee St) |
| | 68.4 | 1631E | <5.0 | MH 05-2 (R/R East of Gee St) |
| 5/6/2010 | | 1631E | <5.0 | MH 05-2 (R/R East of Gee St) |
| 5/7/2010 | 37.8 | 1631E | <5.0 <5.0 | MH 05-25 (Gee St & Oakhurst) |
| 5/4/2010 | 41.1 | 1631E | <5.0 | MH 05-25 (Gee St & Oakhurst) |
| 5/5/2010 | 1640.0 | | <5.0 <5.0 | MH 05-25 (Gee St & Oakhurst) |
| 5/6/2010 | 33.1 | 1631E | <5.0 <5.0 | MH 05-25 (Gee St & Oakhurst) MH 05-25 (Gee St & Oakhurst) |
| 5/7/2010 | 37.8 | 1631E | | INIT 00-20 (Gee of a Cantidist) |

COMMERCIAL MERCURY RESULTS (ppt) 2010

Ark. Mercury WQ standard of 0.012 ppb (or 12 ppt)

| Results | EPA Method Used | MQL Achieved | Site |
|---------|---|--|-----------------------------|
| | 1631E | <5.0 | Roto-Rooter |
| | 1631E | <5.0 | Roto-Rooter |
| | 1631E | <5.0 | Strawfloor Landfill |
| | 1631E | <5.0 | Legacy Landfill |
| | 1631E | <5.0 | Knuckles&sons |
| | 1631E | <5.0 | Harris P&L |
| | | <5.0 | West Plant |
| | | <5.0 | Rosecare Nursing |
| | | <5.0 | West Plant |
| | | <5.0 | Gibson's Radiator |
| | | <5.0 | Gibson's Radiator |
| 5.98 | 1631E | <5.0 | West Plant |
| | | | |
| | | | |
| | Results 1240 3460 4.76 27.5 12,220 479 1920 21.2 456 27.2 66.9 5.98 | 1240 1631E 3460 1631E 4.76 1631E 27.5 1631E 12,220 1631E 479 1631E 1920 1631E 21.2 1631E 456 1631E 27.2 1631E 66.9 1631E | 1240 1631E <5.0 |



Owned by the Citizens of Jonesboro

December 17, 2010

Mr. Rufus Torrence
Pretreatment Engineer
ADEQ Water DivisionNPDES Permits Section
5301 North Shore Drive
North Little Rock, AR 72118

Dear Mr. Torrence:

In February 2009, the Westside Treatment Facility was analyzed for Table 2 parameters. Endrin was below detection levels. As a condition of permit renewal process, CWL Westside Treatment Facility was required to perform a Priority Pollutant Scan. The PPS was analyzed in August 2009. The endrin result was reported above water quality standards. After August 2009, four additional analyses were performed on the effluent of the Westside Treatment Facility. Since each analysis after August 2009 were below detection levels, CWL feels that the August 2009 result was not a representative sample. Enclosed is a copy of those results from our contract laboratory, Environmental Testing and Consulting, Inc., Memphis TN.

If you have any questions, please contact me at 870-930-3389 or email at mtaylor@jonesborocwl.org.

Sincerely yours,

Myra Taylor

Laboratory Supervisor

Mapa Saylar

Pretreatment Coordinator



"A Laboratory Management Pattner"

2790 Whitlen Road

Memphis, Tennessee 36133

(901) 213-2400

Fax (901) 213-2440

10/26/2009

City Water & Light Ms. Myra Taylor 400 East Monroe Avenue Jonesboro, AR, 72403

Ref:

Analytical Testing

Report Number: 09-238-9238

Project Description: West Plant PPS

Dear Ms. Myra Taylor:

Environmental Testing and Consulting, Inc. received 2 sample(s) on 8/26/2009 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in our laboratory in accordance with Standard Methods, The Solid Waste Manual SW-846, EPA Methods for Chemical Analysis of Water and Wastes and /or 40 CFR part 136.

The EPA requires that water samples analyzed for pH, dissolved oxygen and total residual chlorine be analyzed in the field. Analyses and results reported which do not indicate "Field" for these parameters were analyzed outside the holding time as specified in Table II of 40 CFR Part 136.3.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, instrumentation maintenance and calibration were performed in accordance with guidelines established by the USEPA and NELAP.

The results are shown on the attached analysis sheet(s).

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

Sincerely,

Randy Thomas

Project Manager

Randell H. Thomas

Kentucky UST

#41

Virginia

EPA

NFL AP

[#]S-46279 #TN00012 #100456



ENVIRONMENTAL TESTING & CONSULTING, INC. 2790 WHISTON ROAD METICAL TRANSPORTED TRANSPORTED TO THE PART OF THE PROPERTY OF THE

'A Laboratory Management Partner'

West Plant PPS

City Water & Light 400 East Monroe Avenue

Project

Description

Jonesboro, AR 72403

Lab Order Number 09-238-0238

Lab ID

0908428-001A

Field ID

Effluent Composite 8/25-26/09

Sample Number

77618

Report of Analysis

Received 08/26/09

Matrix Aqueous

Sampled 08/26/09 9:00

| <u>Analytical Method 60</u> Prep Method 608 | Prep Batch | 26009 | | | Date/Time Prep | ped 0 | 3/28/09 10:17 |
|--|---------------------------------------|--------------|-----------------|---------|-----------------|-------|---------------|
| . roje meme | Default Vol/Wt | 1000 ml | Sample Vol/Wt 1 | 1060 ml | Date/Time | | Analytical |
| Compound | Result | Units | MQL | DF | Analyzed | Ву_ | Batch |
| | · · · · · · · · · · · · · · · · · · · | | | , | | | |
| Aldrin | < 0.00400 | μg/L | 0.0046 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| alpha-BHC | < 0.00400 | μg/L | 0.004 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| beta-BHC | < 0.00400 | μg/L | 0.004 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| delta-BHC | < 0.00400 | μg/L | 0.004 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| gamma-BHC | < 0.00400 | μg/L | 0.004 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| Chlordane | < 0.0200 | μg/L. | 0.02 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| Chlorpyrifos | < 0.00700 | μg/L | 0.007 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| 4.4′-DDD | < 0.00400 | µg/L | 0.004 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| 4,4'-DDE | < 0.00400 | μg/L | 0.004 | 00 1 | 09/03/09 20:04 | DPC | 40929 |
| 4,4'-DDT | < 0.00400 | μg/L | 0.004 | .00 1 | 09/03/09 20:04 | DPC | 40929 |
| Dieldrin | < 0.00400 | µg/L | 0.004 | 00 1 | 09/11/09 7:15 | DPC | 40929 |
| Alpha-Endosulfan | < 0.00400 | μg/L | 0.004 | 00 1 | 09/11/09 7:15 | DPC | 40929 |
| | < 0.00400 | μg/L. | 0.004 | .00 1 | 09/03/09 20:04 | DPC | 40929 |
| Endosulfan II Endosulfan sulfate | < 0.00400 | μg/L | 0.004 | 100 1 | 09/03/09 20:04 | DPC | 40929 |
| | 0.142 | | 0.004 | 100 1 | 09/11/09 7:15 | DPC | 40929 |
| Endrin | < 0.00400 | | 0.004 | 100 1 | 09/03/09 20:04 | DPC | 40929 |
| Endrin aldehyde | < 0.00400 | μg/L | 0.004 | | 09/11/09 7:15 | DPC | 40929 |
| Heptachlor | < 0.00400 | • • • | 0.004 | | 09/03/09 20:04 | DPC | 40929 |
| Heptachlor epoxide | < 0.0300 | | 0.03 | | 09/03/09 20:04 | DPC | 40929 |
| Toxaphene | | μg/∟ 64 % | Limits: 36-116 | 1 | 09/03/09 20:04 | DPC | 40929 |
| | orobiphenyl | 47 % | Limits: 25-123 | 1 | 09/03/09 20:04 | DPC | 40929 |
| Surrogate: Tetrachl | oro-m-xylen e | 41 70 | EH1005. 2.0-120 | • | 33,52,50 2010 . | | |

| | * | Surrogate Recovery outside accepted limits | * I | Recoveries affected by interferences or high background |
|----------------------------|-----------|--|-----|---|
| Qualifiers/ Definitions | _ | Analyte detected in the associated Method Blank | DF | Dilution Factor |
| DOMINIONS | E | Value exceeds method calibration range | H | Prepped / Analyzed out of holding time. |
| | J | Estimated Value Analyte below reported detection limit | M | Minimum value |
| | MDL | Method Dection Limit (unadjusted) | MQL | Method Quantitation Limit (adjusted) |
| | | Method Reporting Limit | N | Refer to attached Non-Compliance Report |
| | Q | RPD >40% between primary and confirmation columns | SQL | Sample Quantitation Limit (adjusted MDL) |
| 10/26/09 | 2614 CWL_ | _IONESBOR | | |



2790 Whitten Road

Memphis, Tennessee 38133 "A Laboratory Management Partner"

(901) 213-2400

11/24/2009

City Water & Light Ms. Myra Taylor 400 East Monroe Avenue Jonesboro, AR, 72403

Ref:

Analytical Testing

Report Number: 09-324-0217

Project Description: West Plant Effluent

Dear Ms. Myra Taylor:

Environmental Testing and Consulting, Inc. received 1 sample(s) on 11/20/2009 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in our laboratory in accordance with Standard Methods, The Solid Waste Manual SW-846, EPA Methods for Chemical Analysis of Water and Wastes and /or 40 CFR part 136.

The EPA requires that water samples analyzed for pH, dissolved oxygen and total residual chlorine be analyzed in the field. Analyses and results reported which do not indicate "Field" for these parameters were analyzed outside the holding time as specified in Table II of 40 CFR Part 136.3.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, instrumentation maintenance and calibration were performed in accordance with guidelines established by the USEPA and NELAP.

The results are shown on the attached analysis sheet(s).

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

Sincerely,

Randy Thomas

Randell H. Thomas

Project Manager

Virginia

#04015 #9311 #02027 #00106 Florida Pennsylvania USDA EPA

NELAP

#E87943 #68-3195 #S-46279 #TN00012

#100456

California #05240CA #T104704180-05-TX Texas



ENVIRONMENTAL TESTING & CONSULTING, INC. 2700 VANCEOR ROAD MACROPHIA TRANSMISSION 18013 18013 213-2460 FAX 18071 213-2448

"A Laboratory Management Partner"

City Water & Light 400 East Monroe Avenue Jonesboro, AR 72403

Project

West Plant Effluent

Description

Lab Order Number 09-324-0217

Lab ID Field ID 0911373-001A

Sample Number

West Plant Effluent 11/18-19/09

88523

Report of Analysis

Received 11/20/09

Aqueous Matrix

Sampled 11/19/09 9:00

| <u>Analytical Meth</u> Prep Method 35 | = | Prep Batch | 27222 | | | | | Date/Time Prepped | | 11/20/09 11:59 | |
|--|----------------------|--------------------------|-------------------------|-----------|---------------------------|-----------|--------------|--|------------|---------------------|--|
| Compound | 1 | Default Vol/Wt Result | 1000 mL Units | Sample Vo | ol/Wt MQL | 1030 L | nL DF | Date/Time Analyzed | Ву | Analytical Batch | |
| Endrin Surrogate: | Tetrachloro-m-xylene | < 0.00400 | μg/L 44 % 57 % | | 0.004 25-123 36-116 | | 1 1 10 | 11/23/09 21:57 11/23/09 21:57 11/20/09 22:38 | DPC DPC | 42221 | |

| 0.10 | * | Surrogate Recovery outside accepted limits | *1 | Recoveries affected by interferences or high background |
|----------------------------|----------|--|-----|---|
| Qualifiers/ Definitions | | Analyte detected in the associated Method Blank | DF | Dilution Factor |
| 2) Commenda | E | Value exceeds method calibration range | H | Prepped / Analyzed out of holding time. |
| | J | Estimated Value Analyte below reported detection limit | M | Minimum value |
| | MDL | Method Dection Limit (unadjusted) | MQL | Method Quantitation Limit (adjusted) |
| | | Method Reporting Limit | | Refer to attached Non-Compliance Report |
| | | RPD >40% between primary and confirmation columns | SQL | Sample Quantitation Limit (adjusted MDL) |
| 11/24/09 | 2614 CWL | | | |



2790 Whitten Road

Memphis, Tennessee 38133 (901) 2 "A Laboratory Management Partner"

(901) 213-2400

Fax (901) 213-2440

12/2/2009

City Water & Light Ms. Myra Taylor 400 East Monroe Avenue Jonesboro, AR, 72403

Ref:

Analytical Testing

Report Number: 09-335-0221

Project Description: West Plant/Endrin

Dear Ms. Myra Taylor:

Environmental Testing and Consulting, Inc. received 1 sample(s) on 12/1/2009 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in our laboratory in accordance with Standard Methods, The Solid Waste Manual SW-846, EPA Methods for Chemical Analysis of Water and Wastes and /or 40 CFR part 136.

The EPA requires that water samples analyzed for pH, dissolved oxygen and total residual chlorine be analyzed in the field. Analyses and results reported which do not indicate "Field" for these parameters were analyzed outside the holding time as specified in Table II of 40 CFR Part 136.3.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, instrumentation maintenance and calibration were performed in accordance with guidelines established by the USEPA and NELAP.

The results are shown on the attached analysis sheet(s).

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

Sincerely,

Dondy Thomas

Randell H. Thomas

Randy Thomas Project Manager

Virginia

#00106

NELAP



Environmental Testing & Consulting, Inc. 2780 Whitten Road Merichia Tannosade 38133 1501; 213-2400 Fax (801) 213-2440 'A Laboratory Management Partner'

West Plant/Endrin

City Water & Light 400 East Monroe Avenue

Project

Description

Lab Order Number 09-335-0221

Jonesboro, AR 72403

Lab ID

0912009-001A

Field ID

West Plant Effluent 11/24-25/09

Sample Number

89389

Report of Analysis

Received 12/01/09 Matrix Aqueous

Sampled 11/25/09 9:00

| Analytical Method 608 Prep Method 608 | | Prep Batch | 27322 | | | | Date/Time Prep | ped | 12/01/09 12:15 | |
|---------------------------------------|---------------------|------------------------|-------|-----------------------|---------|----|----------------|-----|----------------|--|
| | | Default Vol/Wt 1000 ml | | Sample Vol/Wt 1040 ml | | | Date/Time | | Analytical | |
| Compound | | Result | Units | MQL | | DF | Analyzed | | Batch | |
| Endrin | | < 0.00400 | μg/L | | 0.00400 | 1 | 12/02/09 11:17 | DPC | 42317 | |
| Surrogate: | Decachlorobiphenyl | | 64 % | Limits: | 36-116 | 10 | 12/02/09 0:16 | DPC | 42317 | |
| Surrogate: | Tetrachioro-m-xylen | € | 49 % | Limits: | 25-123 | 10 | 12/02/09 0:16 | DPC | 42317 | |

| Oualifiers/ | , | * | Surrogate Recovery outside accepted limits | * I | Recoveries affected by interferences or high background |
|-------------|---------|-----|--|-----|---|
| Definitions | | В | Analyte detected in the associated Method Blank | | Dilution Factor |
| |] | E | Value exceeds method calibration range | H | Prepped / Analyzed out of holding time. |
| | | J | Estimated Value Analyte below reported detection limit | M | Minimum value |
| | М | DL | Method Dection Limit (unadjusted) | MQL | Method Quantitation Limit (adjusted) |
| | M | ĪRĹ | Method Reporting Limit | | Refer to attached Non-Compliance Report |
| | • | Q | RPD >40% between primary and confirmation columns | SQL | Sample Quantitation Limit (adjusted MDL) |
| 12/02/09 | 2614 CV | WL_ | JONESBOR | | |



Environmental Testing & Consulting, Inc. (901) 213-2400

"A Laboratory Management Partner"

2790 Whitten Road

Memphis, Tennessee 38133

Fax (901) 213-2440

12/30/2009

City Water & Light Ms. Myra Taylor 400 East Monroe Avenue Jonesboro, AR, 72403

Ref:

Analytical Testing

Report Number: 09-363-0208

Project Description: West Plant Effluent

Dear Ms. Myra Taylor:

Environmental Testing and Consulting, Inc. received 1 sample(s) on 12/29/2009 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in our laboratory in accordance with Standard Methods, The Solid Waste Manual SW-846, EPA Methods for Chemical Analysis of Water and Wastes and /or 40 CFR part 136.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, instrumentation maintenance and calibration were performed in accordance with guidelines established by the USEPA and NELAP.

The results are shown on the attached analysis sheet(s).

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

Sincerely.

Rendell H. Thomas

Randy Thomas Project Manager



2790 Whitten Road

Merchis Thonores 28123 A Laboratory Manager 1901) 213-2400

Fax (001) 219-2440

City Water & Light 400 East Monroe Avenue

Project

West Plant Effluent

Description

Jonesboro, AR 72403

Lab Order Number 09-363-0208

0912471-001A

Lab ID Field ID

West Plant Effluent 12/22-23/09

Sample Number

92595

Report of Analysis

Received 12/29/09

Aqueous Matrix

Sampled 12/23/09 9:00

Analytical Method 608 12/29/09 13:07 Date/Time Prepped Prep Batch 27666 Prep Method Analytical Date/Time 1060 ml Sample Vol/Wt 1000 ml Default Vol/Wt Batch Ву DF Analyzed MQL Result Units Compound VC 42710 12/29/09 19:37 0.00400 1 μg/L < 0.00400 Endrin 42710 12/29/09 19:37 VC Limits: 36-116 1 58 % Decachiorobiphenyl Surrogate: VC 42710 12/29/09 19:37 41 % Limits: 25-123 1 Surrogate: Tetrachloro-m-xylene

| 0 100 | ** | Surrogate Recovery outside accepted limits | * I | Recoveries affected by interferences or high background |
|---|----------|--|-----|---|
| Qualifiers/ Definitions | | Analyte detected in the associated Method Blank | DF | Dilution Factor |
| 200000000000000000000000000000000000000 | E | Value exceeds method calibration range | H | Prepped / Analyzed out of holding time. |
| | J | Estimated Value Analyte below reported detection limit | M | Minimum value |
| | MDL | Method Dection Limit (unadjusted) | _ | Method Quantitation Limit (adjusted) |
| | | Method Reporting Limit | N | Refer to attached Non-Compliance Report |
| | 0 | RPD >40% between primary and confirmation columns | SQL | Sample Quantitation Limit (adjusted MDL) |
| 12/30/09 | 2614 CWL | JONESBOR | | |



2790 Whitten Road

Memphis, Tennessee 38133 (901) 21
"A Laboratory Management Partner"

(901) 213-2400

Fax (901) 213-2440

12/31/2009

City Water & Light Ms. Myra Taylor 400 East Monroe Avenue Jonesboro, AR, 72403

Ref:

Analytical Testing

Report Number: 09-364-0214

Project Description: Endrin/West Plant

Dear Ms. Myra Taylor:

Environmental Testing and Consulting, Inc. received 1 sample(s) on 12/30/2009 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in our laboratory in accordance with Standard Methods, The Solid Waste Manual SW-846, EPA Methods for Chemical Analysis of Water and Wastes and /or 40 CFR part 136.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, instrumentation maintenance and calibration were performed in accordance with guidelines established by the USEPA and NELAP.

The results are shown on the attached analysis sheet(s).

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

Sincerely,

Randell H. Thomas

Randy Thomas Project Manager

Virginia

NELAP



2700 Whiten Road

Merchis Thonossee 38133 A Esperatory Manage (901) 213-2400

FAL (801) 213-2440

City Water & Light 400 East Monroe Avenue

Project

Endrn/West Plant

Description

Lab Order Number 09-364-0214

Jonesboro, AR 72403

0912495-001A

Lab ID Field ID

West Plant-Effluent 12/28-29/09

Sample Number

92758

Report of Analysis

Received 12/30/09

Matrix Aqueous

Sampled 12/29/09 9:00

Analytical Method 12/30/09 14:46 Date/Time Prepped Prep Batch 27694 Prep Method Analytical Date/Time Sample Vol/Wt 1040 ml 1000 ml Default Vol/Wt Batch Analyzed Ву DF MQL Result Units Compound 42733 VC 1 12/30/09 19:09 0.00400 μg/L < 0.00400 Endrin VC 42733 12/30/09 19:09 77 % Limits: 36-116 1 Decachlorobiphenyl Surrogate: 42733 ۷C Limits: 25-123 12/30/09 19:09 54 % 1 Tetrachloro-m-xylene Surrogate:

| Oualitiers/ | * | Surrogate Recovery outside accepted limits | * I | Recoveries affected by interferences or high background |
|---------------------------|----------|--|-----|---|
| Quantiers/ Definitions | _ | Analyte detected in the associated Method Blank | DF | Dilution Factor |
| | E | Value exceeds method calibration range | H | Prepped / Analyzed out of holding time. |
| | J | Estimated Value Analyte below reported detection limit | M | Minimum value |
| | MDL | Method Dection Limit (unadjusted) | MQL | Method Quantitation Limit (adjusted) |
| | | Method Reporting Limit | N | Refer to attached Non-Compliance Report |
| | Q | RPD >40% between primary and confirmation columns | SQL | Sample Quantitation Limit (adjusted MDL) |
| 12/31/09 | 2614 CWL | JONESBOR | | |

| F | | AR0037907 4 | | Ionesboro CW9 | 11 |
|--|--|---|--|--|-------|
| PPS Program Report | * NPDES ID: | AR0043401 | Permittee's Name_ | 12/20/10 | |
| | * Report Received/Event Date: | | Date_ | 12/20/10 | |
| port Type | | | | | |
| C Biosolids Program Report | | Pretreetmen | nt Performance Summary R | eport | |
| CAFO Annual Report | | C SSO Annua | l Report | | |
| CSO Event Report | | C SSO Event | Report | | |
| C Local Limits Report | | SSO Month | ly Event Report | | |
| C MS4 Program Report | | C Storm Water | r Event Report | | |
| | | | | | CHTIN |
| Report Inf | ormation | | | Local Limits , | |
| * Pretreatment Performance Summary Start Date: | 10/1/09 | Date of Most | Recent Technical Evaluat Loca | ion & or al Limits: | |
| Significant Indust | irial Users (SIUs) | Date of Mo | st Recent Adoption of Tec Based Loca | | |
| SIUs: | 177 | | Local Limit Po | "school and a design for the second s | |
| SIUs Without Control Mechanism: | 0 | | | | |
| SIUs Not Inspected: | 0 | | | | |
| SIUs Not Sampled: | 0 | | | ADD Z REMOVE | |
| SIUs in SNC with Pretreatment Standards: | 0 | | , i | emoval Credits | |
| SIUs in SNC with Reporting Requirements: | 0 | Re | emoval Credits Application | Status: Not Applicable | |
| SIUs in SNC with Pretreatment Schedule: | D. | ≣ ⋅ | Recent Removal Credits A | oproval: | , a |
| SIUs in SNC Published in Newspaper: | 0 | нинениянна выправания выправания выправания выправания выправания выправания выправания выправания выправания в | Removal | Credits: | |
| SIUs Schedules: | | | | : J | |
| Violation Notices Issued to SIUs: | 4 | | | | |
| Administrative Orders Issued to SIUs: | 0 | | 3.33 | ADD / REMOVE | A |
| Civil Suits Filed Against SIUs: | 0 | | ACC Acceptance of Hazardous | eptance of Waste | |
| Criminal Suits Filed Against SIUs: | | <u> </u> | Non-Hazardous Industrial | (1) | |
| Categorical Indus | trial Users (CIUs) | | ance of Hauled Domestic) | | |
| CIUs: | 7 | | | Deficiencies | |
| CIUs in SNC: | 0 | # Deficiencie | s Identified During IU File | | |
| Pena | NOT AND THE RESIDENCE OF AN AND PROPERTY OF THE PROPERTY OF TH | | Control Mechanism Defici Legal Authority Defici | | |
| Dollar Amount of Penalties Collected: g | | E Deficiencie | es in Data Management an | | |
| strial Users (IUs) from which Penalties have been collected: | 0 | = = = = | Partio | cipation: | |
| Clher Info | noilemto | Deficiencies i | n Interpretation and Applic Pretreatment Sta | 4110 201 | |
| SUO Reference: | | - E | acy of Sampling and Insp | 1 | |
| SUO Date: | | Adeq | uacy of Pretreatment Res | 1 | |
| Annual Pretreatment Budget: g | | Annual Freque | Ar ncy of Influent Toxicant S | mual Frequency | 32.N. |
| Pass-Through/Interference Indicator: | | | ncy of Effluent Toxicant S | | |
| ation of IU Schedule for Remedial Measures: | No 💥 | <u> </u> | ncy of Sludge Toxicant S | | |
| nal Response to Violation of IU Schedule for Remedial Measures: | | a Annual Freque | , | I | |