

August 4, 2020

Honorable Darrell Trahan, Mayor  
City of Huntsville WWTF  
P.O. Box 430  
Huntsville, AR 72740

email: [mayortrahan@huntsvillearkansas.org](mailto:mayortrahan@huntsvillearkansas.org)

**RE: NPDES Permit Number: AR0022004, AFIN: 44-00018  
Ammonia Test Lab Error**

Dear Mayor Trahan:

The Division of Environmental Quality (DEQ) has conducted a review of the Ammonia Nitrogen tests performed by GTS, Inc., from May 20, 2018 through October 30, 2019. The review revealed that Ammonia Nitrogen tests conducted for Outfall 001-A during September 2018, October 2018, November 2018, December 2018, January 2019, February 2019, March 2019, April 2019, May 2019, June 2019, July 2019, August 2019, and September 2019 as required by NPDES Permit No. AR0022004 (Permit) deviated from the EPA Method Update Rule, 40 C.F.R. § 136, Table 1B, footnote 6, that requires the lab to distill regulatory samples before ammonia determination. These tests have been deemed invalid.

Please correct the 001-A Discharge Monitoring Reports (DMRs) for September 2018 through September 2019, to reflect "NODI M – Laboratory Error" for Ammonia Nitrogen and attach this letter as your non-compliance report. These corrections should be made by October 1, 2020.

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

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](mailto:allen-daniel@adeq.state.ar.us).

Sincerely,



Richard Healey  
Enforcement Branch Manager  
Office of Water Quality

Cc: Sean Davis, Director ([huntsvillewater@madisoncounty.net](mailto:huntsvillewater@madisoncounty.net))  
Richard Brown, Lab Director, GTS, Inc. ([Richard.brown@gtsconsulting.net](mailto:Richard.brown@gtsconsulting.net))

**Division of Environmental Quality**

5301 Northshore Drive, North Little Rock, AR 72118  
[adeq.state.ar.us](http://adeq.state.ar.us)