EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3	A R 0 0 2 1 8 0 6 11 12	0 7 0 4 1 0 17 18	C 19	S 20	1

Remarks: A F I N 6 0 - 0 0 4 0 9 P U L A S K I C O U N T Y

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 5	71 N 72	N 73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Little Rock Wastewater Utility – Adams Field Plant
1001 Temple
Little Rock, AR

Entry Time /Date
0830 on 04/10/07

Exit Time/Date
1130 on 04/10/07

Permit Effective Date
01/01/07

Permit Expiration Date
12/31/11

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Perry Thornton / Plant Superintendent / 501-688-1526

Other Facility Data

Major mun.
PL 92-500

Name, Address of Responsible Official/Title/Phone and Fax Number
Reggie Corbitt, C.E.O
221 E. Capitol
Little Rock, AR 72202

Contacted	
Yes	No
	X

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	M	Flow Measurement	S	Operations & Maintenance	S	Sampling
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	N	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The facility's effluent flow meter was found to be out of the 10% allowable error.

During this inspection it was also found that the plant has changed their process operation of their aeration basins from a complete mix and aeration to a plugged flow and partial aeration to create an anoxic zone at the head of the basins and to increase detention time. Also the facility is now maintaining a two foot sludge blanket in their final clarifiers, where in previous years they have maintained virtually no blanket.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Zachary Watson	ADEQ / Little Rock / (501) 682-0658 / 682-0910	04/10/07
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**

	Permit No. AR0021806

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ■ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED no*)
DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	■ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ■ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	■ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED	☐ Y ■ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ■ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED no*)
DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	■ Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	■ S ☐ M ☐ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	■ Y ☐ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	■ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	■ Y ☐ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	■ Y ☐ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	■ Y ☐ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	■ Y ☐ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	■ S ☐ M ☐ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	■ S ☐ M ☐ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	■ Y ☐ N ☐ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ■ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED yes*)
DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.	■ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	■ S ☐ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.	■ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	■ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE.	■ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	■ S ☐ M ☐ U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	■ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	■ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	■ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	■ Y ☐ N ☐ NA

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SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	■ Y ☐ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	■ Y ☐ N ☐ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	■ Y ☐ N ☐ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	■ Y ☐ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ■ N ☐ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ■ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED no)*.
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	■ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	■ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	■ Y ☐ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	■ Y ☐ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	■ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	■ Y ☐ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	■ Y ☐ N ☐ NA
b) PROPER PRESERVATION TECHNIQUES USED.	■ Y ☐ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	■ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ■ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ■ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED no)*
DETAILS: Flow calibration check was out of the +/-10% range of error

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.	■ Y ☐ N ☐ NA
TYPE OF DEVICE weir	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	■ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☐ Y ■ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE. *(DATE OF LAST CALIBRATION 0 1/01/07)*	■ Y ☐ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	■ Y ☐ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	■ Y ☐ N ☐ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	■ Y ☐ N ☐ NA
6. HEAD MEASURED AT PROPER LOCATION.	■ Y ☐ N ☐ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	■ Y ☐ N ☐ NA

SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ■ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED no)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	■ Y ☐ N ☐ NA

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SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ■ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ■ S ☐ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ■ S ☐ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. >10 % OF THE TIME. ■ Y ☐ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. >10 % OF THE TIME. ■ Y ☐ N ☐ NA

7. COMMERCIAL LABORATORY USED. ■ Y ☐ N ☐ NA

LAB NAME In House Lab

LAB ADDRESS 9500 Birdwood; Little Rock, AR

PARAMETERS PERFORMED BOD, TSS, FCB, TRC, & pH

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATION ■ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED no).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	none	none	none	none	none	clear	NA

RECEIVING WATER OBSERVATIONS could not observe due to airport access restrictions.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ■ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED no).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ■ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ■ S ☐ M ☐ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: agricultural (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED N/A).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ■ N ☐ NA

2. TYPE OF SAMPLE OBTAINED NA

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ■ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ■ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ■ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ■ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ■ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ■ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ■ NA

Attachment # 1
NPDES Permit No. AR0021806

Outfall 001

DMR Calculation Check

Reporting Period: from 2007 (Year) Jan. (Month) 01 (Day) to 2007 (Year) Jan. (Month) 31 (Day)

Parameter Checked: TSS

	Quantity		
	Monthly Mass Avg. (lbs/day)	**Monthly Avg.(mg/l)**	**7-Day Avg.(mg/l)**
Reported Value:	**2930**	**9.0**	**10.5**
Calculated Value:	**1556**	**9.0**	**10.5**
Permit Value:	**9010.00**	**30.00**	**45.00**

If calculated value does not equal reported value, explain:

VALUES EQUAL / OK

Attachment # 2
NPDES Permit No. AR0021806

Outfall 001

Flow Calculation Sheet

Field Data: Date 4-10-07 Time 1045 hrs.
Head 4.0 Inches
Type & Size of Flow Monitoring Device 36 ft. rectangular weir without end contractions
Name & Model of Flow Monitoring Device Inventron 9140 P
Recorded Flow at date & time listed above 11.84 MGD

Reference for Flow Calculations Isco Open Channel Flow Measurement Handbook - Fifth Edition

Formula: 4.0"/12" = .334 Head feet

MGD $Q=2.152\ LH^{1.5}$

Calculations: $Q = 2.152 \times 36 \times .334^{1.5}$
$= 2.152 \times 36 \times .237$
= 18.36 MGD

% error = Recorded value - calculated value (100)
calculated value

$= \frac{11.84 - 14.91}{14.95}\ (100) = \frac{-3.07}{14.95}\ (100) = .2059\ (100) =$ 20.59 % error

The flow calibration check revealed an error of 20.59 %, which is outside the + or - 10 % error of actual flow requirement.

ADEQ

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

April 19, 2007

Reggie Corbitt, C.E.O.
Little Rock Wastewater Utility
221 East Capitol
Little Rock, AR 72202

Re: AFIN: 60-00409 NPDES Permit No. AR0021806
AR0040177

Dear Mr. Corbitt:

On April 10 and 17, 2007, I performed a routine compliance inspection of your facilities in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. This inspection revealed the following violation:

The effluent flow meter at the Adams Field Plant's outfall 001 was found to be operating outside of the allowable 10 % error range.

Please submit a written response to this finding to the Enforcement Branch of this Department. This response should contain documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response is due by **May 10, 2007.**

If I can be of any assistance, please contact me at (501)-682-0658.

Sincerely,

Zachary Watson
District Field Inspector
Water Division

cc: Enforcement Branch
Permits Branch