

ADEQ

ARKANSAS
Department of Environmental Quality

March 17, 2008

Gary Mills, Utility Manager
North Little Rock Wastewater
P.O. Box 17898
North Little Rock, AR 72117

AFIN: 60-00274

NPDES Permit No.: AR0020303

Dear Mr. Mills:

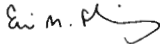
On March 11, 2008, and March 12, 2008, I performed a routine Pretreatment Compliance Inspection of the North Little Rock Wastewater Utility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. The IU self monitoring violations should be addressed the same way as an IU Permit violation found by the POTW. A July 11, 2007, pH of 4.2 S.U. was found during self-monitoring at Truck-O-Mat. The ERP was not followed as required.
2. I found that during my site visit to Truck-O-Mat that rain water is entering the pretreatment system through a grated drain located out side of the main building. This is diluting the facility waststream and introducing a considerable volume of water into the POTW collection system (inflow).

The above item requires your immediate attention. Please submit a written response to this finding to the Water Division Enforcement Section 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 April 6, 2008.

If I can be any assistance, please contact me at 501-682-0659.

Sincerely,



Eric M. Fleming
Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460
NPDES Compliance Inspection Report

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 0 3 0 3 11 12 0 8 0 3 1 1 17 18 P 19 S 20 1					
Remarks					
0 0 2 C					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	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) North Little Rock Wastewater Utility – located at 7400 Baucum Pike in North Little Rock, AR	Entry Time /Date 1200 on 3-11-08	Permit Effective Date 1-1-03
	Exit Time/Date 1000 on 3-12-08	Permit Expiration Date 12-31-08
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Beth Caipen – Pretreatment Clerk / 501-945-7186 Ed Toland – Pretreatment Specialist / 501-945-7186 Mitch Foreman – Senior Industrial Technician / 501-945-7186	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Gary Mills - Utility Manager / (501)-945-7186 7400 Baucum Pike North Little Rock, AR 72117	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

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

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

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

See attached PCI form dated 3-11-08 for further details.

Name(s) and Signature(s) of Inspector(s) Eric M. Fleming /	Agency/Office/Telephone/Fax ADEQ / Little Rock / 501-682-0659	Date 3-11-08
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: North Little Rock Wastewater Utility

AFIN Number: 60-00274

NPDES Permit Number(s): AR0020303, AR0020320, AR0038288

Program Tracked under NPDES Permit Number: AR0020303

Fact Sheet Preparation Date: _____

Date of Last PCI/Audit: November 30, 2006 and December 1, 2006

Date of Last Annual Report: March 8, 2007

Name of Inspector: Eric M. Fleming

Date PCI Performed: March 11, 2008 and March 12, 2008

Name, Title, and Telephone Number of Facility Representative:
Rick Roll, Superintendent of Operations - (501)-945- 7186

Name and Title of Other Participants: _____
Ed Toland, Pretreatment Specialist, Mitch Foreman Senior
Industrial Technician, Beth Caipen, Pretreatment Clerk

Number of IUs Visited: 2

Name(s) of IUs Visited: _____
Deluxe Media Services, Truck-O-Mat

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? yes

2. Describe any apparent problems with the local limits.
 None were noted at this time.

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in Permit:	Program:	Comments:
Metals:				
Influent:	<u>1 qtr</u>	<u>1 qtr</u>	<u>n/a</u>	<u></u>
Effluent:	<u>1 qtr</u>	<u>1 qtr</u>	<u>n/a</u>	<u></u>
Sludge:	<u>1 qtr</u>	<u>1 qtr</u>	<u>n/a</u>	<u></u>
Organics:				
Influent:	<u>1 yr</u>	<u>1 yr</u>	<u>n/a</u>	<u></u>
Effluent:	<u>1 yr</u>	<u>1 yr</u>	<u>n/a</u>	<u></u>
Sludge:	<u>1 yr</u>	<u>1 yr</u>	<u>n/a</u>	<u></u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?

There were no inhibitions or upsets in the past year.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? yes

2. How many IU permits (or other control documents) have been issued? 15

3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**

yes

4. Does the control document contain the following items?

An expiration date: yes

Discharge limitations: yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: yes

IU reporting requirements: yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes

Type of sample: Yes

Monitoring frequency: yes

Bypass prohibition: yes

Right of entry: yes

Nontransferability: yes

Revocation clause: yes

Penalty Provisions: yes

Slug load notification: yes

Notification of process change: yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>twice/month</u>	<u>Once/month</u>
other SIUs	<u>twice/month</u>	<u>Once/year</u>
Inspection:		
categorical IUs	<u>Once/year</u>	<u>Once/year</u>
other SIUs	<u>Once/year</u>	<u>Once/year</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes

3. Are inspections announced or unannounced? Mostly unannounced ~ 1 hour

4. Are records kept of each inspection? yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: yes

Officials present: yes

Inspection of chemical storage areas: yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: yes

Inspection of the pretreatment facilities: yes

Review of self-monitoring records: yes

Observation of IU self-monitoring procedures: yes

Verification that approved analytical techniques are used: yes

Verification of IU flow measurement (where required): yes

6. Overall adequacy of inspection documentation: yes

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).

yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? yes

9. Are sampling and flow monitoring equipment properly maintained? yes

10. Is the POTW keeping proper field notes and chain of custody forms? yes

11. Is the sampling location representative of the discharge to the collection system? yes

12. Are sampling locations identified in POTW records? yes

13. Are sampling services available in an emergency? yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports?

Dates for all reports are listed and tracked on computer

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?

No, all but pH. If pH violations are found on the self-monitoring reports, they are not addressed.

17. What are the POTW's procedures for following up violations?

The ERP is currently being followed. ERP is on file.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: yes

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: yes

Other environmental permits held: yes

Description of operations: yes

Process flow diagrams: yes

Flow measurements: yes

Measurements of regulated pollutants: yes

Certification of compliance by the IU: yes

Compliance schedule (if needed): yes

19. Additional comments on the POTW's inspection and sampling procedures:

If pH violations are found on the self-monitoring reports, they are not addressed. This will need to be better addressed, since a permit limit violation did occur.

5. Comments on the POTW's enforcement procedures:

See below.

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? yes
2. Are staffing levels adequate? yes
3. Are the responsible officials familiar with the approved program? yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW: none
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? yes
3. Does the POTW have copies of permits for IUs in other cities? no
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? n/a
5. Comments on multijurisdictional issues: none

H. EVALUATION AND COMMENTS

The following IU files were reviewed and inspected:
Truck-o-mat, and Deluxe Media Services.

I noted 3 pH violations that the city found during their site visits. These 3 violations were addressed as per their ERP. During my file review I found that the self-monitoring pH violations are NOT addressed. A pH sample collected on 11/12/07 was 4.2 S.U. The POTW will need to address these violations.

I found no violations during these 2 file reviews. The POTW continues to properly implement their Pretreatment Program.

I did find during the site visit to Truck-O-mat that an outside grated floor drain drains into the treatment system. This inflow causes dilution of process water and creates an inflow into the POTW.

Other files that were reviewed were: Koppers Industries.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Truck-O-Mat Truckwash

POTW Name: Faulkner Lake POTW

Industry Contacts: Gary Cozad, Manager

Date and Time of Visit: 3-12-08 @ 0800

Description of Manufacturing Process:
Commercial Truckwash

Sources of Process Wastewater:
Washing and rinsing operations of truck exteriors and cabs.

Categorical Industry? no

Basis for Limits: n/a

Point of Application: n/a

Description of Pretreatment Equipment and Procedures:
Sedimentation traps, and pH adjustment.

Spill Prevention and Solvent Management Procedures:
Chemicals are located in a chemical storage building.

Sampling Location and Equipment:
A sampling port and a refrigerated composite sampler.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Deluxe Media Services (No longer in Operation)

POTW Name: Faulkner Lake POTW

Industry Contacts: John Landry / (501) 955-3031

Date and Time of Visit: 3-11-08 @ 1540

Description of Manufacturing Process:
Multi Media manufacturing

Sources of Process Wastewater:
n/a

Categorical Industry? n/a

Basis for Limits: n/a

Point of Application: n/a

Description of Pretreatment Equipment and Procedures:
n/a

Spill Prevention and Solvent Management Procedures:
n/a

Sampling Location and Equipment:
n/a

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

	CODE
INSPECTOR'S NAME: <u>Eric M. Fleming</u>	
NAME OF FACILITY: <u>North Little Rock Wastewater Utility</u>	
PERMIT NUMBER USED TO TRACK PROGRAM: <u>AR0020303</u>	NPID
DATE OF PCI: <u>3-11-08 to 3-12-08</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS): <u>15</u>	SIUS
NUMBER OF CATEGORICAL IUS: <u>1</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW: <u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM: <u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING: <u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS: <u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW: <u>0</u>	SNIN

L QUALITY



MAR 31 2008

MARKED

NORTH LITTLE ROCK WASTE WATER UTILITY

March 31, 2008

Certified Mail # 7003 3110 0004 6966 6673

Enforcement Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR. 72118

RE: (NPDES Permit # AR0020303) Response Report for Pretreatment Compliance
Inspection conducted by Mr. Eric Fleming on March 11, 2008 and March 12, 2008.

The following corrective actions have been taken on the violations noted during this inspection.

1. The IU self monitoring violations should be addressed the same way as an IU Permit violation found by the POTW. A July 11, 2007, pH of 4.2 S.U. was found during self-monitoring at Truck-O-Mat. The ERP was not followed as required.
Corrective action: The Utility will now call to inform IU's of all pH violations including self-monitoring pH violations reported to the Utility on the IU's DMR's.
2. I found that during my site visit to Truck-O-Mat that rain water is entering the pretreatment system through a grated drain located out side of the main building. This is diluting the facility wastestream and introducing a considerable volume of water into the POTW collection system (inflow).
Corrective action: The Utility has met with Mr. Gary Cozad the Manager of Truck-O-Mat and he is in agreement to install a valve which meets the Utility's requirements to prevent any inflow from a rain event to enter the sanitary sewer system from this drain.

If you have any questions concerning the above responses, please contact me at (501) 945-7186 ext.117.

NORTH LITTLE ROCK WASTE WATER UTILITY

A handwritten signature in cursive script that reads 'Emric F. Roll'.

Emric F. Roll
Superintendent of Operations, NLRWWU

ADEQ

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

October 24, 2008

Ric Roll
North Little Rock WW Utility
Faulkner Lake Plant
North Little Rock, AR 72117-0898

RE: NPDES Permit AR0020303, AFIN 60-00274
Response to Inspection

Dear Mr. Roll:

ADEQ has received your response to this year's routine Pretreatment Compliance Inspection of your facility by our District Field Inspector, Eric Fleming. Your letter appears to adequately address the discrepancies identified during the visit.

The Department will keep the inspection and response on file and will consider them as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires ADEQ to consider the past history of your company and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any violations.

Thank you for your attention to this matter. If we need further information, we will contact you. Should you have any questions, feel free to contact me by phone at 501-682-0632 or e-mail at robertsa@adeq.state.ar.us. In any written correspondence to this Department, please refer to NPDES Permit AR0020303.

Sincerely,



Anne Roberts
Enforcement Administrator
Enforcement Branch
Water Division