

June 11, 2008

Reggie Corbitt, C.E.O. Little Rock Wastewater 11 Clearwater Drive Little Rock, AR 72204

AFIN: 60-00409 NPDES Permit No.: AR0021806

AR0040177

Dear Mr. Corbitt:

On May 29, 2008, I performed routine compliance inspections and SSO inspections of both the Adams Field and Fourche Creek wastewater plants. These inspections were performed in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. These inspections revealed the following violations:

AR0021806

- 1. The mounting bracket caps on the #2 clarifier are broken and allowing a noticeable amount of pin floc to leave the clarifier.
- 2. The newly installed weir does not have the required nappe due to the weir being greater than the desired thickness (1/4''). This is making a manual flow measurement impossible at the moment. Therefore monthly flow checks are not being performed as required.

No problems were noted on the SSO inspection.

AR0040177

No problems were noted with either the POTW inspection or the SSO inspection.

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 July 2, 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

≎EPA

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												1																					
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	Section B: Facility Data																																	
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Peri	ne(s) of On-Site Representative(s)/T ry Thornton / Plant Superintender an Samples Ledbetter – Lab Supe	ıt / 50	1-688-15	543	Numbe	r(s)										Oth	Other Facility Data																	
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S	Records/Reports	M	Self-M	onitorii	ng Pro	gram		N	Slud	ge Hano	llin	g/Di	sposa	ıl		N	N Pollution Prevention																	
S	Facility Site Review	N	Compl	iance S	chedul	es		N	Pret	reatmen	ıt			Pretreatment				N Multimedia																
S	Effluent/Receiving Waters	S																S Other: SSO																
	Section D: Summary of Findings/Comments (Attach additional sheets if necessary)																Oth	er: S	SSO															
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a			ection D:	Summa	•			ments	s (Atta	ch addi	tior					y)																		
Sec	ction C(2) – The mounting bra		ection D:	Summa	•			ments	s (Atta	ch addi	tior					y)				the	clarif	ier.												
Sec	ction E(1&6) – The newly installed	cket weir	caps on	Summa the #2	clari	fier are	e brok appe da	ments	s (Atta	ch addi	tior	otice	able than	amo	ount desire	ry) of pired thic	ı flov	v to l	leave															
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SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	Øy □n □na □ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□y □n ☑na □ne
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	⊠y □n □na □ne
4. ALL DISCHARGES ARE PERMITTED:	⊠y □n □na □ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	⊠y □n □na □ne
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠S □M □U □NA □NE
a. DATES AND TIME(S) OF SAMPLING:	⊠y □n □na □ne
b. EXACT LOCATION(S) OF SAMPLING:	⊠y □n □na □ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	⊠y □n □na □ne
d. ANALYTICAL METHODS AND TECHNIQUES:	⊠y □n □na □ne
e. RESULTS OF CALIBRATIONS:	⊠y □n □na □ne
f. RESULTS OF ANALYSES:	⊠y □n □na □ne
g. DATES AND TIMES OF ANALYSES:	⊠y □n □na □ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	⊠y □n □na □ne
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	⊠s □m □u □na □ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	⊠S □M □U □NA □NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	Øy □n □na □ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S ☑M □U □NA □NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	ØS □M □U □NA □NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	OS ØM OU ONA ONE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs □m □u □na □ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	OS OM OU ONA ONE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	ØS OM OU ONA ONE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	ØS OM OU ONA ONE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs □m □u □na □ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	Øy □n □na □ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	ØY □N □NA □NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	ØY □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	ØY □N □NA □NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	ØY □N □NA □NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☐Y ØN ☐NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	ØY □N □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y ☑N □NA □NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S □M □U □NA □NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y □N □NA □NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☑Y □N □NA □NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y □N □NA □NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y □N □NA □NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y □N □NA □NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y □N □NA □NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y □N □NA □NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑y □n □na □ne
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☑y □n □na □ne
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	│ □S ☑M □U □NA □NE
DETAILS:	
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: 10' rectangular weir without end contractions	□y ☑n □na □ne
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y □N □NA □NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☑Y □N □NA □NE
4. CALIBRATION FREQUENCY ADEQUATE: 9-12-7	☑Y □N □NA □NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑y □n □na □ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	□Y ☑N □NA □NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y □N □NA □NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y □N □NA □NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	MY ON ONA ONE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	OY ON MA ONE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	Øy □n □na □ne
4. QUALITY CONTROL PROCEDURES ADEQUATE:	Øy □n □na □ne
5. DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:	ØY □N □NA □NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	ØY □N □NA □NE
7. COMMERCIAL LABORATORY USED:	Øy □n □na □ne
a. LAB NAME: American Interplex Corporation	
b. LAB ADDRESS: 8600 Kanis Road, Little Rock	
c. PARAMETERS PERFORMED: Oil and Grease 8. BIOMONITORING PROCEDURES ADEQUATE:	□y □n ☑na □ne
	☐Y ☐N ☑NA ☐NE
a. PROPER ORGANISMS USED:	☐Y ☐N ☑NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED: c. PROPER TEST METHODS AND DURATION:	DY DN MA DNE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐Y ☐N ☑NA ☐NE
G. RETEGTO AND/ON THE FERT ORIGINAL AS REQUIRED.	LI LIN VINA LINE

SECTION	G: EFFLUE	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS								
	N VISUAL OBS			02021(1)(1)		М ѕ □м □	U DNA DNE						
DETAILS:							<u> </u>						
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER						
001	None	None	none	none	none	clear	-						
Receiving Strea	m: Was not observed	at this time.		•									
SECTION	SECTION H: SLUDGE DISPOSAL												
SLUDGE D	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN	TS		⊠s □m □	U □NA □NE						
DETAILS:					<u>.</u>								
1. SLUDGE M	IANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s □м	□U □NA □NE						
2. SLUDGE R	ECORDS MAINTAINE	O AS REQUIRED BY 40) CFR 503:			⊠s □м	□U □NA □NE						
3. FOR LAND	APPLIED SLUDGE, T	PE OF LAND APPLIE	D TO: (E.G., FOREST,	, AGRICULTURAL, PUI	BLIC CONTACT SITE): a	gricultural							
SECTION	I: SAMPLIN	G INSPECTION	ON PROCEDI	URES									
SAMPLE R	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S		□s □m □	U □NA ☑NE						
DETAILS:													
1. SAMPLES	OBTAINED THIS INSP	ECTION:				□Y	☑N □NA □NE						
2. TYPE OF S	AMPLE: ☐GRAB:	□COMPOSITE:_ N	METHOD: FREQUE	NCY:									
3. SAMPLES	PRESERVED:					□Y	□N □NA □NE						
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				□Y	□N □NA □NE						
5. SAMPLE O	BTAINED FROM FACII	LITY'S SAMPLING DE\	/ICE:			□Y	□N □NA □NE						
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			□Y	□N □NA □NE						
7. SAMPLE S	PLIT WITH PERMITTE	E:				□Y	□N □NA □NE						
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					□N □NA □NE						
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□N □NA □NE						
	J: STORM V												
	ATER MANAG		S PERMIT RE	QUIREMENTS	5		U ☑NA □NE						
DETAILS:_	NO EXPOSURE	CERTIFIED											
1. SWPPP UP	PDATED AS NEEDED:_	_ DATE OF LAST UP	DATE:			+	□N □NA □NE						
2. SITE MAP I	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:				□N □NA □NE						
3. POLLUTIOI	N PREVENTION TEAM	IDENTIFIED:				+	□N □NA □NE						
4. POLLUTIOI	N PREVENTION TEAM	PROPERLY TRAINED):				□N □NA □NE						
5. LIST OF PO	DTENTIAL POLLUTAN	T SOURCES:					□N □NA □NE						
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:			+	□N □NA □NE						
	STORM WATER DISCH	ARGES ARE AUTHOR	IZED:				□N □NA □NE						
	RUCTURAL BMPS:					+	ON ONA ONE						
	ON-STRUCTURAL BMF						□N □NA □NE						
	PERLY OPERATED A						□N □NA □NE						
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:					□N □NA □NE						

FLOW CALCULATION SHEET

NOT PERFROMED

Date:	Time:		
Head in Inches:	Head Feet:		
Type & Size of Prima	ary Flow Measurement Device	:	
Name & Model of Se	condary Flow Measurement D	evice:	
Recorded Flow at Da	ate & Time Listed Above:		_ (Facility Flow Meter)
	Pate & Time Listed Above: Of charts in: ISCO Open Channel Flow Mea	asurement Handbook-5 th	Edition)
% Error = Recorde	ed Value - Calculated Valu Calculated Value	<u>ie</u> X 100	
% Error =	-	— X 100	
% Error =	——— X 100		
% Error =	X 100		
% Error =	%		
Comments:			

DMR Calculation Check

Reporting Period: From 08 03 01 To 08 03 31

Year Month Day Year Month Day

Parameter Checked: Flow, MGD

	Loading Mass	Concen Mon	
	Mo. Avg lbs/day	Monthly Average	Daily Max.
Reported Value:		34.1	60.17
Calculated Value:		34.1	60.17
Permit Value:		REPORT	REPORT

If calculated value does not equal reported value, explain:

Same



The above photo shows the leaking mounting bracket caps on the #2 final clarifier.



Pointer 34°44′03.24° N 92°12′48.68° W elev 254 ft Streaming | 100% Eye alt 199
This photo shows the POTW in the spring of 2006. The large EQ basin on the bottom left went into service in July 2006.

June 25, 2008



Mr. Eric M. Fleming
Inspector – Water Division
Arkansas Department of Environmental Quality
P.O. Box 8913
Little Rock, Arkansas 72219-8913

RE: AFIN: 60-049

NPDES Permit No.: AR0021806

Dear Mr. Fleming:

This letter is in response to your correspondence of June 11, 2008, concerning the permit compliance inspection performed on May 29, 2008. Responses to each comment noted in your letter have been provided for each of the listed violations indicating the corrective actions taken.

<u>Violation 1</u>: "The mounting bracket caps on the #2 final clarifier are broken and allowing a noticeable amount of pin floc to leave the clarifier."

<u>Response</u>: The mounting bolt bracket caps were repaired (06/03/08) by the plant maintenance staff. The #2 clarifier is currently having the catwalk repainted and when completed we plan to return the unit back into service. We will closely monitor the unit once back in service. (See attached documentation)

<u>Violation</u> 2: "The newly installed weir does not have the required nappe due to the weir being greater than the desired thickness (1/4"). This is making a manual flow measurement impossible at the moment. Therefore, monthly flow checks are not being performed as required."

Response: In December 2007, Adams Field switched from chlorine gas to ultra-violet light disinfection. During construction, manual measurement of the effluent flow had been suspended. Manual flow measurement of each UV channel (four total), will be accomplished by measuring the weir gate and water height in reference to the top of the checkered plating to create a head height, and compare to the UV flow meter for accuracy. Procedures have been developed and will be used on all four channels; Adams Operations will perform measurements on a monthly basis. The Adams Operations staff will be trained on measurement procedures, location, and proper recording practices. (See attached documentation)

If you have any questions concerning this letter, or if I can provide additional information, please call me at 688-1543 or 258-7371.

Sincerely,

LITTLE ROCK WASTEWATER UTILITY

Perry O. Thornton

Adams Field Plant Superintendent

CC: Reggie Corbitt, C.E.O.

Stan Miller, Director of Operations

Little Rock Wastewater Utility

06/16/2008 05:39 PM

221 East Capitol Avenue Little Rock, AR 72202 (501)376-2903 Fax (501)376-3541

Report Date

COMPLETED Facility Work Order

Out of Service

Potential Service Request

Page 1

Work Order #	520124		Activity	MTREPL	REPLA	CE		
Facility ID	AS2			Description	on FINAL	CLARIFIER #	ł2	
Qualifier	TREATMEN	NT PLANT						
Area				District				
Sub-area				Locatio	n			
Мар#								
Facility Type				Service Sta	tus			
				Constructed	t	X Co	ord	
Parcel				As Built		Y Co	ord	
						Z Cod	ord	
Area Size	0.00	00				Surfa	ce Cover	
Budget Number								
Ownership								
Site								
Initiated By	0924	RONALD	KNIGHT	In	itiated Date	08/15/2006	Scheduled	
Assigned To		-		Se	ervice #		Due	
Authorization	1364		DAVID WOOD)				
Budget#								
•								
crew								
	PRO		PROACTIVE I	MAINTENANCE				
Crew Maint Type Priority	PRO 3		PROACTIVE I AHEAD OF R		21			

Submitted By PTHORNTON

Work Order Comments

Project

Source

REPLACE GASKET ON WEER AND CHANGE RUBBER SKIRT AT CENTERWELL. 08/15/06 Pulled old rubber and making new rubber. 07/26/07 Pulled gasket and waiting for new one.08-02-07 CUT METAL TO LENGTH. 09/04/07 Drill holes in metal. 09/05/07 Finished drilling holes in angle. 09/19/07 Pulled out old backer rod, installed aluminum angle to hold backer rod. 09/27/07 Checked Clarifier, counted plates, designed plates, design and pick out rubber and lay out job; advised Perry. 09/28/07 Worked on tasks and all material ordering. 06/03/08 Replace metal plates and gaskets, also replaced couple of studs.

Completed Wo	ork Orders				Transfer of		
Work Order #	Activity	Description	Completed	Comp By	Condition	Result	Quantity
610987	MTHANG	HANG	08/20/2007	1443			0.0
605835	MTREPL	REPLACE	08/21/2007	1504			0.0
570326	MTINST	INSTALL	03/23/2007	0874			0.0
520124	MTREPL	REPLACE	06/04/2008	0924			0.0
500392	MTAPM8	ANNUAL PM	08/04/2006				0.0
323793	MTAPM8	ANNUAL PM	07/27/2004	0874			0.0
220794	МТАРМ8	ANNUAL PM	07/29/2002	1181		-	0.0
193605	MTAPM8	ANNUAL PM	07/10/2001	0924			0.0
152670	MTINSP	WALKING INSPECTION	08/09/1999	0924			0.0

Safety Procedures Message Description

Activity Comments

There are no safety messages for this asset. Please follow required safety procedures.

EFFLUENT FLOW CALIBRATION CHECK ADAMS FIELD TREATMENT PLANT LITTLE ROCK WASTEWATER

8	VARIANCE COMPUTED BY							
	CALCULATED % ERROR							
	CALCULATED EFFLUENT Q (MGD)							
	HEAD HEIGHT DIFFERENCE IN INCHES							
WEASUREMENTS:	WEIR GATE DEPTH IN HEAD INCHES							
TOP OF SLAB ME	WATER LEVEL DEPTH IN HEAD INCHES							
	UV METER FLOW Q (MGD)							
UV Channel #1 FLOW:	DATE							

Formula:

Flow $(Q) = 3.33(L)(H)^{1.5}$

 $L = Length \ of \ Weir = 4.69$

H = Head over Weir in Feet

UV Flow = 8.54Example:

Manual Measurement Difference = 2.6 Inches

 $Q = 3.33(4.69)(2.6/12)^{1.5}$ Q = 3.33(4.69)(0.1009) Q = 8.26

% Error = [((Recorded Value - Calculated Value)/Calculated Value)(100)]

% Error = [[(8.54-8.26)/8.26)(100)]

% Error = [(0.28/8.26)(100)]

% Error = [(0.0339)(100)]

% Error = [3.39] % Error = 3.39

10% Allowable Variance Range