



ARKANSAS  
Department of Environmental Quality

December 10, 2008

Gary Mills, General Manager  
NLR Wastewater Utility  
PO Box 17898  
North Little Rock, AR 72117

AFIN: 60-00274, NPDES Permit No: AR0020303, AR0020320, and AR0038288 Routine Compliance Inspection  
No Exposure Certifications ARR000067, ARR000175, and ARR000299

Dear Mr. Mills:

On December 3 and 4 2008, Lindsay Stoker and I performed a routine compliance inspection of the above referenced 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. The inspections revealed the following:

**AR0020303 (Faulkner Lake Plant):** - No violations of this permit were noted at the time of the inspection. However, it appears based upon the spread sheet used by your laboratory, that monthly average is being calculated improperly. The previous permit for this facility required monthly average to be calculated as a flow weighted average. When the permit was renewed, effective April 1, 2008, the definition in Part IV, 7 of the permit dropped the flow weighting requirement for the calculation of monthly average. The DMR I checked for this inspection revealed no difference between a flow-weighted and normal monthly average. However, you should double check all the DMRs submitted by NLR since this permit became effective to ensure that monthly average has been properly reported. Your laboratory should take the flow weighting for monthly average out of the formula in their spread sheet.

**ARR000067 (No Exposure) Faulkner Lake Plant** – During the inspection, a waste oil pan and empty containers were noted to be potentially exposed to rainfall. It will be necessary to submit a corrective action plan to remove any waste product from exposure to rainfall or you must develop and implement a stormwater pollution prevention plan.

**AR0020320 (Five Mile Creek):** - The following violations were noted:

1. Vegetation was growing in the floating baffle curtain wall and there was some erosion on the exterior levee. This is a violation of Part II, Section B, Paragraph b of the permit.
2. The monthly average concentration for BOD and TSS is not being properly calculated. The previous permit for this facility required monthly average to be calculated as a flow weighted average. When the permit was renewed, effective February 1, 2007, the definition in Part IV, 7 of the permit dropped the flow weighting requirement for the calculation of monthly average. In order to correct this violation, it will be necessary to recheck all DMRs submitted since February 1, 2007 and submit corrected DMRs where necessary. The April 2008 DMR that was checked for this inspection erroneously reported the monthly average for BOD and TSS. Your laboratory should take the flow weighting for monthly average out of the formula in their spread sheet.

**ARR000175 (No Exposure) Five Mile Creek Plant** – During the inspection, old equipment was noted to be potentially exposed to rainfall. It will be necessary to submit a corrective action plan to remove any waste product from exposure to rainfall or you must develop and implement a stormwater pollution prevention plan.

**AR0038288 (White Oak Bayou Plant):** - The following violations were noted:

Mr. Gary Mills, NLR Wastewater Utility

December 5, 2008

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1. The monthly average concentration for BOD and TSS is not being properly calculated. The previous permit for this facility required monthly average to be calculated as a flow weighted average. When the permit was renewed, effective February 1, 2005, the definition in Part IV, 7 of the permit dropped the flow weighting requirement for the calculation of monthly average. In order to correct this violation, it will be necessary to recheck all DMRs submitted since February 1, 2005 and submit corrected DMRs where necessary. The April 2008 DMR that was checked for this inspection erroneously report the monthly average for BOD and TSS. Your laboratory should take the flow weighting for monthly average out of the formula in their spread sheet.
2. The plant continues to receive significant hydraulic loads. The design capacity of this facility is 4.25 mgd. The April 2008 DMR that was reviewed for this inspection revealed the average flow for the month was 6.557 mgd or 150% of design. The peak flow during the month was 17.734 mgd or over 400% of design. Inflow and infiltration is a significant problem for this facility.

**ARR000299 (No Exposure) White Oak Bayou Plant** – During the inspection, old equipment and wastewater solids were noted to be potentially exposed to rainfall. It will be necessary to submit a corrective action plan to remove any waste product from exposure to rainfall or you must develop and implement a stormwater pollution prevention plan.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department. This response should contain documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by **December 29, 2008**.

If I can be any assistance, please contact me at [benson@adeq.state.ar.us](mailto:benson@adeq.state.ar.us) or 501-683-0827.

Sincerely,



Dennis Benson  
District 9 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



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

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

# 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 1 2 0 4 17 18 C 19 S 20 1					
Remarks 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 4	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) <b>NLR Wastewater Utility – Faulkner Lake Plant- 7400 Bauscum Pike, NLR</b>	Entry Time/Date <b>09:25 am on 12/04/08</b>	Permit Effective Date <b>4/1/2008</b>
	Exit Time/Date <b>11:20 am on 12/04/08</b>	Permit Expiration Date <b>3/31/2013</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Emric Roll, Superintendent 501-945-7186</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Gary Mills NLR Wastewater Utility PO Box 17898 North Little Rock, AR 72117 501-945-7186</b>	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	S	Flow Measurement	S	Operations & Maintenance	N	Sampling
M	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	S	Laboratory	U	Storm Water	N	Other:

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

- The permittee has filed a "No Exposure" certification, ARR000067 with ADEQ. During the inspection, materials potentially exposed to rainfall were noted.
- The DMR for April 2008 was checked as part of this inspection. While what was reported did match the DMR results, it appears the monthly average concentration for this facility is being calculated as a flow weighted average. The requirement for a flow weighted monthly average was removed from the permit when the new permit became effective 04/01/08

Name(s) and Signature(s) of Inspector(s) <b>Dennis Benson</b>	Agency/Office/Telephone/Fax <b>AR Dept. of Environmental Quality- (501) 683-0827/(501) 682-0910 (Fax)</b>	Date <b>12/04/08</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

<b>SECTION A: PERMIT VERIFICATION</b>	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION B: RECORDKEEPING AND REPORTING EVALUATION</b>	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION C: OPERATIONS AND MAINTENANCE</b>	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED: <b>Grit removal was not being operated, this is normal mode of operations</b>	<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

<b>SECTION D: SAMPLING</b>	
<b>PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION E: FLOW MEASUREMENT</b>	
<b>PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>SECTION F: LABORATORY</b>	
<b>PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS</b>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
<b>DETAILS:</b>	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE

**SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS**

BASED ON VISUAL OBSERVATIONS ONLY S M U NA NE

DETAILS: **No flow at the time of inspection, permittee was bringing clarifier on line**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER

**SECTION H: SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: S M U NA NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: S M U NA NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

**SECTION I: SAMPLING INSPECTION PROCEDURES**

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: Y N NA NE
2. TYPE OF SAMPLE: GRAB:\_\_\_ COMPOSITE:\_\_\_ METHOD:\_\_\_ FREQUENCY:\_\_\_
3. SAMPLES PRESERVED: Y N NA NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: Y N NA NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: Y N NA NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: Y N NA NE
7. SAMPLE SPLIT WITH PERMITTEE: Y N NA NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: Y N NA NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: Y N NA NE

**SECTION J: STORM WATER POLLUTION PREVENTION PLAN**

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS: **No exposure ARR000067 – Materials were exposed to rainfall**

1. SWPPP UPDATED AS NEEDED:\_\_\_ DATE OF LAST UPDATE: Y N NA NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: Y N NA NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: Y N NA NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: Y N NA NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: Y N NA NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: Y N NA NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: Y N NA NE
8. LIST OF STRUCTURAL BMPS: Y N NA NE
9. LIST OF NON-STRUCTURAL BMPS: Y N NA NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: Y N NA NE
11. INSPECTIONS CONDUCTED AS REQUIRED: Y N NA NE

### FLOW CALCULATION SHEET

No flow at the time of the inspection, permittee was bringing clarifier on line.

Date: 12/04/08 Time: 09:50 am

Head in Inches: \_\_\_\_\_ Feet: \_\_\_\_\_

Type & Size of Primary Flow Measurement Device:

Name & Model of Secondary Flow Measurement Device:

**Milltronics OCMII27828**

Recorded Flow at Date & Time Listed Above: \_\_\_\_\_ (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: \_\_\_\_\_  
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5<sup>th</sup> Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{\quad - \quad}{\quad} \times 100$$

$$\% \text{ Error} = \frac{\quad}{\quad} \times 100$$

$$\% \text{ Error} = \frac{\quad}{\quad} \times 100$$

$$\% \text{ Error} = \frac{\quad}{\quad} \%$$

Comments:

### DMR Calculation Check

Reporting Period: From 08 04 01 To 08 04 30  
 Year Month Day Year Month Day

Parameter Checked: BOD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>556.4</u>	<u>5.6</u>	<u>6.8</u>
Calculated Value:	<u>556.4</u>	<u>5.6</u>	<u>6.8</u>
Permit Value:	<u>3002.0</u>	<u>30</u>	<u>45</u>

If calculated value does not equal reported value, explain:  
Although, monthly average value is equal above, it does appear from the permittee's spread sheet that the monthly average is flow weighted. It did not make any difference this month. However, this method is no longer appropriate.



### DMR Calculation Check

**Reporting Period:** From 08 04 01 To 08 04 30  
Year Month Day Year Month Day

**Parameter Checked:** TSS

	<b>Loading Mass Mo. Avg. - lbs/day</b>	<b>Concentration Monthly Mo. Avg. - mg/l</b>	<b>7-day Avg. - mg/l</b>
<b>Reported Value:</b>	<u>637.1</u>	<u>6.4</u>	<u>7.2</u>
<b>Calculated Value:</b>	<u>637.1</u>	<u>6.4</u>	<u>7.2</u>
<b>Permit Value:</b>	<u>3002.0</u>	<u>30</u>	<u>45</u>

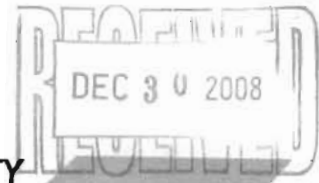
**If calculated value does not equal reported value, explain:**

**Although, monthly average value is equal above, it does appear from the permittee's spread sheet that the monthly average is flow weighted. It did not make any difference this month. However, this method is no longer appropriate.**

**NPDES Compliance Inspection Report  
Further Explanation**



042998  
12-29-08



NORTH LITTLE ROCK WASTE WATER UTILITY

December 22, 2008

Water Division  
Arkansas Department of Environment Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317  
ATTN: Mr. Dennis Benson

RE: AFIN: 60-00274, NPDES Permit Numbers AR0020303, AR0020320, AR0038288  
No Exposure Certifications ARR000067, ARR000175, ARR000299

The following replies and/or corrective actions pertain to the "violations" noted during the annual inspection by Dennis Benson:

**AR0020303 – Faulkner Lake Plant**

**Finding:** No violations of this permit were noted at the time of the inspection. However, it appears based upon the spread sheet used by your laboratory, that monthly average is being calculated improperly. The previous permit for this facility required monthly average to be calculated as a flow weighted average. When the permit was renewed, effective April 1, 2008, the definition in Part IV, 7 of the permit dropped the flow weighting requirement for the calculation of monthly average. The DMR I checked for this inspection revealed no difference between a flow-weighted and normal monthly average. However, you should double check all the DMRs submitted by NLR since this permit became effective to ensure that monthly average has been properly reported. Your laboratory should take the flow weighting for monthly average out of the formula in their spread sheet.

**Reply:** We have recalculated the BOD and TSS values for April, 2008 to date (see attached sheet). We will resubmit the corrected DMRs for this time frame. The laboratory has revised the formula to reflect the changes made for monthly averages.

**ARR000067 (No Exposure) Faulkner Lake Plant**

**Finding:** During the inspection, a waste oil pan and empty containers were noted to be potentially exposed to rainfall. It will be necessary to submit a corrective action plan to remove any waste product from exposure to rainfall or you must develop and implement a stormwater pollution prevention plan.

**Reply:** The maintenance department will clean the area and relocate the waste oil collection area to an area inside a shed that is protected from the rain. Additionally, a

#### **AR0038288 White Oak Bayou Plant**

**Finding:** The monthly average concentration for BOD and TSS is not being properly calculated. The previous permit for this facility required monthly average to be calculated as a flow weighted average. When the permit was renewed, effective February 1, 2005, the definition in Part IV, 7 of the permit dropped the flow weighting requirement for the calculation of monthly average. In order to correct this violation, it will be necessary to recheck all DMRs submitted since February 1, 2005, and submit corrected DMRs where necessary. The April, 2008 DMR that was checked for this inspection erroneously report the monthly average for BOD and TSS. Your laboratory should take the flow weighting for monthly average out of the formula in their spread sheet.

**Reply:** We have recalculated the BOD and TSS values from February, 2005, to present (see attached sheets). We will resubmit corrected DMRs for this time frame.

**Finding:** The plant continues to receive significant hydraulic loads. The design capacity of this facility is 4.25 mgd. The April 2008 DMR that was reviewed for this inspection revealed the average flow for the month was 6.557 mgd or 150% of design. The peak flow during the month was 17.734 mgd or over 400% of design. Inflow and infiltration is a significant problem for this facility.

**Reply:** We have contracted Marlar Engineering to design the plant modifications which would double the capacity to 8.50 mgd. Plans and specifications were submitted to ADEQ on August 4, 2008, and approvals have been received from the Arkansas Department of Health and the Arkansas Natural Resources Commission. The project is ready to advertise for construction. However, Mr. Mo Shaffi with ADEQ at a meeting on November 19, 2008, changed the previously agreed upon design requirements. The Utility has retained legal counsel and is seeking resolution.

Inflow and Infiltration will be addressed in the scope of our Master Plan which is being conducted by CDM Engineering. The scope of the Master Plan includes flow monitoring, hydraulic system modeling, CMOM self assessment, and a capital improvements plan which are all scheduled to be complete by January, 2010.

#### **AR000299 (No Exposure) White Oak Bayou Plant**

**Finding:** During the inspection, old equipment and wastewater solids were noted to be potentially exposed to rainfall. It will be necessary to submit a corrective action plan to remove any waste product from exposure to rainfall or you must develop and implement a stormwater pollution prevention plan.

**Reply:** The rags that were lying on the wooden pallets by the fence line were immediately removed and discarded. The wooden pallets were staged for disposal after installation of new aerators. The pallets have been removed and the old equipment will be removed by January 9, 2008.

Due to the holidays and vacations, the January timeframes were necessary for completion of some corrective actions.

container tank will be constructed for the oil collection tank to sit inside to contain any spills that might occur. This project will be completed by January 30, 2009.

**AR0020320 Five Mile Creek Plant**

**Finding:** Vegetation was growing in the floating baffle curtain wall and there was some erosion on the exterior levee. This is a violation of Part II, Section B, Paragraph b of the permit.

**Reply:** The vegetation was sprayed with herbicide several weeks ago and the dead vegetation had not been removed prior to the plant inspection. We will remove the vegetation from the floating baffle curtain by January 16, 2009.

**Finding:** The monthly average concentration for BOD and TSS is not being properly calculated. The previous permit for this facility required monthly average to be calculated as a flow weighted average. When the permit was renewed, effective February 1, 2007, the definition in Part IV, 7 of the permit dropped the flow weighting requirement for the calculation of monthly average. In order to correct this violation, it will be necessary to recheck all DMRs submitted since February 1, 2007, and submit corrected DMRs where necessary. The April 2008 DMR that was checked for this inspection erroneously reported the monthly average for BOD and TSS. Your laboratory should take the flow weighting for monthly average out of the formula in their spread sheet.

**Reply:** We have recalculated the BOD and TSS values for February, 2007, and 2008 to date (see attached sheets). We will resubmit the corrected DMRs for this time frame. The laboratory has revised the formula to reflect the changes made for monthly averaging.

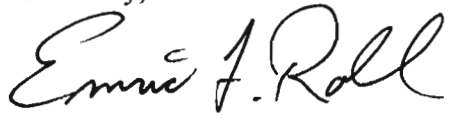
**AR000175 (No Exposure) Five Mile Creek Plant**

**Finding:** During the inspection, old equipment was noted to be potentially exposed to rainfall. It will be necessary to submit a corrective action plan to remove any waste product from exposure to rainfall or you must develop and implement a storm water pollution prevention plan.

**Reply:** All old equipment will be discarded or removed from the area and stored properly by January 9, 2009.

If I can be of any assistance, please contact me at [RRoll@northlittlerock.ar.gov](mailto:RRoll@northlittlerock.ar.gov) or (501) 945-7186.

Sincerely,

A handwritten signature in black ink that reads "Emric F. Roll". The signature is written in a cursive style with a large, stylized initial "E".

Emric F. Roll  
Superintendent of Operations

cc: Water Division Enforcement Branch  
Water Division Permits Branch  
Marc Wilkins, Asst. Director NLRWWU

**FAULKNER LAKE DATA FOR CORRECTIVE ACTION 2008**

	BOD FLOW WEIGHTED	BOD STRAIGHT AVG	TSS FLOW WEIGHTED	TSS STRAIGHT AVG
APRIL	5.6	5.6	6.4	6.4
MAY	6.0	5.7	3.4	3.5
JUNE	4.7	4.6	4.0	3.9
JULY	6.3	6.2	4.0	4.0
AUGUST	9.8	9.7	8.0	8.5
SEPTEMBER	7.1	7.3	6.5	7.2
OCTOBER	9.9	9.1	10.2	9.0
NOVEMBER	11.7	11.6	7.9	7.6

**WHITE OAK DATA FOR CORRECTIVE ACTION 2005**

	BOD FLOW WEIGHTED	BOD STRAIGHT AVG	TSS FLOW WEIGHTED	TSS STRAIGHT AVG
FEBRUARY	20.1	20.2	16.4	14.3
MARCH	24.4	22.9	17.8	14.8
APRIL	27.0	25.7	29.7	26.2
MAY	21.6	21.5	22.6	22.5
JUNE	16.8	16.5	22.2	22.0
JULY	19.4	20.0	29.6	29.3
AUGUST	24.7	23.1	24.5	24.6
SEPTEMBER	19.4	19.6	22.9	22.6
OCTOBER	22.2	22.0	23.4	23.4
NOVEMBER	20.9	20.3	24.1	23.7
DECEMBER	24.6	25.2	15.0	14.5



**WHITE OAK DATA FOR CORRECTIVE ACTION 2006**

	BOD FLOW WEIGHTED	BOD STRAIGHT AVG	TSS FLOW WEIGHTED	TSS STRAIGHT AVG
JANUARY	27.0	28.2	12.8	12.0
FEBUARY	27.5	27.1	20.5	19.9
MARCH	25.1	22.7	24.9	21.9
APRIL	38.8	38.0	47.0	45.6
MAY	16.5	17.2	18.8	19.5
JUNE	19.5	19.5	28.8	28.3
JULY	22.5	22.7	29.9	30.0
AUGUST	26.6	26.6	34.4	33.6
SEPTEMBER	23.6	24.7	24.5	26.9
OCTOBER	27.8	22.8	23.0	20.5
NOVEMBER	24.6	23.6	18.1	17.2
DECEMBER	23.2	22.9	21.3	21.8

### WHITE OAK DATA FOR CORRECTIVE ACTION 2007

	BOD FLOW WEIGHTED	BOD STRAIGHT AVG	TSS FLOW WEIGHTED	TSS STRAIGHT AVG
JANUARY	15.0	14.9	9.2	9.2
FEBUARY	24.5	24.6	15.0	14.9
MARCH	29.6	29.6	19.2	19.4
APRIL	32.5	30.2	19.9	15.2
MAY	25.8	24.6	26.6	28.0
JUNE	28.7	27.8	38.2	37.4
JULY	31.3	29.8	28.3	26.8
AUGUST	21.2	21.4	25.1	25.4
SEPTEMBER	19.2	18.2	27.6	25.1
OCTOBER	20.9	19.2	13.2	12.2
NOVEMBER	21.9	23.1	23.3	22.7
DECEMBER	22.0	20.5	22.0	20.2

**WHITE OAK DATA FOR CORRECTIVE ACTION 2008**

	BOD FLOW WEIGHTED	BOD STRAIGHT AVG	TSS FLOW WEIGHTED	TSS STRAIGHT AVG
JANUARY	22.8	23.5	22.4	22.1
FEBUARY	22.8	21.7	25.5	25.4
MARCH	18.1	16.8	17.9	17.2
APRIL	16.7	18.2	11.4	11.3
MAY	24.3	24.8	23.6	23.5
JUNE	30.2	31.2	29.6	30.8
JULY	30.3	30.2	19.6	19.5
AUGUST	41.4	32.6	25.8	25.8
SEPTEMBER	21.8	24.9	37.9	39.8
OCTOBER	24.8	26.1	28.8	29.3
NOVEMBER	26.5	26.3	30.2	29.3



### FIVE MILE DATA FOR CORRECTIVE ACTION 2007

	BOD FLOW WEIGHTED	BOD STRAIGHT AVG	TSS FLOW WEIGHTED	TSS STRAIGHT AVG
FEBRUARY	18.2	17.7	17.3	16.9
MARCH	18.5	18.4	20.3	20.4
APRIL	31.0	29.7	49.1	47.0
MAY	23.5	23.3	40.7	41.0
JUNE	16.1	16.1	42.2	42.0
JULY	13.3	13.1	30.7	31.0
AUGUST	10.0	10.0	43.6	43.7
SEPTEMBER	9.7	9.8	29.5	29.3
OCTOBER	12.5	11.4	35.2	33.7
NOVEMBER	20.8	19.1	36.7	35.9
DECEMBER	19.2	19.0	20.7	21.6

**FIVE MILE DATA FOR CORRECTIVE ACTION 2008**

	BOD FLOW WEIGHTED	BOD STRAIGHT AVG	TSS FLOW WEIGHTED	TSS STRAIGHT AVG
JANUARY	12.1	12.2	20.7	20.9
FEBRUARY	16.4	16.4	19.1	18.7
MARCH	11.5	11.1	11.1	11.2
APRIL	10.2	10.1	18.2 DID SHOW 12	18.5
MAY	27.1	25.9	39.7	39.0
JUNE	20.4	20.4	34.2	33.6
JULY	15.8	15.9	19.4	18.9
AUGUST	20.8	18.6	21.8	22.2
SEPTEMBER	16.7	16.0	25.9	28.3
OCTOBER	9.5	9.4	32.1	31.0
NOVEMBER	24.1	23.2	17.0	16.9

**SSO Inspection Checklist****Collection System Description Faulkner Lake Plant AR20303**

1. Describe the collection system.

2. Population of service area/number of residents/commercial connections

Residential = 11,600      Commercial = 1,601

3. Feet of sewer

Estimated 334 Miles +/-

4. Age of system

Plant constructed in 1978. Collection system dates as far back as 1900.

5. Does the collection system experience problems during dry or wet weather? Describe or provide documentation.

6. Agency notification procedure: What information is reported? Provide documentation.

SSO summaries are submitted monthly with the plant DMRs. All SSOs are reported to ADEQ via FAX within 24 hours of occurrence.

## SSO Inspection Checklist

### Pump Stations

1. How many pump stations are in the system? How many have backup power sources?  
There are 14 pump stations in this basin. No backup power sources as yet.  
(See item 3 below)
2. How often are pump/lift stations inspected and monitored? If a SCADA system is used, what parameters are monitored?  
All pump stations are monitored 7 days/week. No SCADA system exists.  
All pump stations have audible/visual alarms.
3. What provisions have been made for emergencies?  
Portable pump system, mobile generator, 3 Vacon trucks

### Satellite Systems

1. Does the collection system receive flow from satellite systems?  
No.
2. Are there any known problems with the satellite collection system (hydraulic flow, WW concentration, ordinances, etc.)?  
N/A
3. Who is responsible for enforcement and response?  
N/A

### Performance Indicators (Collection & Satellite System)

1. Provide a list of sanitary sewer overflows that occurred in the last 5 years, including date, volume (gallons), location, duration, cause, and response.  
See attached.
2. Are all sanitary sewer overflows reported, regardless of size?  
Yes.
3. How many sanitary sewer overflows have reached "waters of the US"? Provide documentation.  
None to our knowledge.

## SSO Inspection Checklist

### Collection System Description White Oak Bayou Plant AR38288

1. Describe the collection system.

2. Population of service area/number of residents/commercial connections

Residential = 6,270

Commercial = 699

3. Feet of sewer

Estimated 120 miles +/-

4. Age of system

Plant was constructed in 1977-1978 time frame. Collection system dates back to 1929.

5. Does the collection system experience problems during dry or wet weather? Describe or provide documentation.

6. Agency notification procedure: What information is reported? Provide documentation.

SSO summaries are submitted monthly with the plant DMRs. All SSOs are reported to ADEQ via FAX within 24 hours of occurrence.



## SSO Inspection Checklist

### Pump Stations

1. How many pump stations are in the system? How many have backup power sources?  
There are 16 pump stations in this basin. No backup power sources as yet.  
(See item 3 below)
2. How often are pump/lift stations inspected and monitored? If a SCADA system is used, what parameters are monitored?  
All pump stations are monitored 7 days/week. No SCADA system exists.  
All pump stations have audible/visual alarms.
3. What provisions have been made for emergencies?  
Portable pump system, mobile generator, 3 Vacon trucks

### Satellite Systems

1. Does the collection system receive flow from satellite systems?  
No.
2. Are there any known problems with the satellite collection system (hydraulic flow, WW concentration, ordinances, etc.)?  
N/A
3. Who is responsible for enforcement and response?  
N/A

### Performance Indicators (Collection & Satellite System)

1. Provide a list of sanitary sewer overflows that occurred in the last 5 years, including date, volume (gallons), location, duration, cause, and response.  
See attached.
2. Are all sanitary sewer overflows reported, regardless of size?  
Yes.
3. How many sanitary sewer overflows have reached "waters of the US"? Provide documentation.  
None to our knowledge.

**SSO Inspection Checklist****Collection System Description Five Mile Creek Plant AR20320**

1. Describe the collection system.

2. Population of service area/number of residents/commercial connections

Residential = 11,483

Commercial = 935

3. Feet of sewer

Estimated 210 Miles +/-

4. Age of system

Plant was constructed in 1965. Collection system dates back prior to that.

5. Does the collection system experience problems during dry or wet weather?  
Describe or provide documentation.

6. Agency notification procedure: What information is reported? Provide documentation.

SSO summaries are submitted monthly with the plant DMRs. All SSOs are reported to ADEQ via FAX within 24 hours of occurrence.

# SSO Inspection Checklist

## Pump Stations

1. **How many pump stations are in the system? How many have backup power sources?**  
There are 13 pump stations in this basin. No backup power sources as yet.  
(See item 3 below)
2. **How often are pump/lift stations inspected and monitored? If a SCADA system is used, what parameters are monitored?**  
All pump stations are monitored 7 days/week. No SCADA system exists.  
All pump stations have audible/visual alarms.
3. **What provisions have been made for emergencies?**  
Portable pump system, mobile generator, 3 Vacon trucks

## Satellite Systems

1. **Does the collection system receive flow from satellite systems?**  
No.
2. **Are there any known problems with the satellite collection system (hydraulic flow, WW concentration, ordinances, etc.)?**  
N/A
3. **Who is responsible for enforcement and response?**  
N/A

## Performance Indicators (Collection & Satellite System)

1. **Provide a list of sanitary sewer overflows that occurred in the last 5 years, including date, volume (gallons), location, duration, cause, and response.**  
See attached.
2. **Are all sanitary sewer overflows reported, regardless of size?**  
Yes.
3. **How many sanitary sewer overflows have reached "waters of the US"? Provide documentation.**  
None to our knowledge.

# ADEQ

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

January 9, 2009

Gary Mills  
North Little Rock Wastewater Utility  
P.O. Box 17898  
North Little Rock, AR 72117-0898

**RE: Response to Inspection—AFIN 60-00274  
NPDES Permits AR0020303, AR0020320, and AR0038288  
No Exposure Certifications ARR000067, ARR000175, and ARR000299**

Dear Mr. Mills:

ADEQ has received your response to the December 3<sup>rd</sup> and 4<sup>th</sup>, 2008 routine compliance inspection of your facilities by our District Field Inspectors Dennis Benson and Lindsay Stoker. We have also received the corrected DMRs with the recalculated BOD and TSS values. Assuming you complete the cleanup and removal of waste products from exposure to rainfall as described in your letter, you remove the vegetation from the floating baffle curtain, and you follow through with the plan to address Inflow and Infiltration pursuant to CAO LIS 08-059, your response to the discrepancies identified during the visit is adequate.

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](mailto:robertsa@adeq.state.ar.us). In any written correspondence to this Department, please refer to NPDES Permit AR0020303 and AFIN 60-00274.

Sincerely,



Anne Roberts  
Enforcement Administrator  
Enforcement Branch  
Water Division