



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

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

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 1 0 0 4 2 3 17 18 P 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 3	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- Fourche Creek.
Merge onto I-30W via Exit 153B, Take the I-440E Exit 138, take the Fourche Dam Pike Exit 5 toward L.R. River Port, Turn right onto Fourche Dam Pike, Turn left onto Frazier Pike, Turn left onto Birdwood Drive.

Entry Time/Date
1:15 p.m. on 04/23/2010

Permit Effective Date
January 1, 2007

Exit Time/Date
4:00 on 04/23/2010

Permit Expiration Date
December 31, 2011

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Walter Collins/Plant Superintendent/Fourche Creek WWTP/Little Rock Wastewater/ 501-490-5402

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number
Reggie Corbitt, C.E.O.
Little Rock Wastewater
11 Clearwater Drive
Little Rock, AR 72204

Contacted
Yes ☐ No ☒

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

No deficiencies or violations were noted during the Pretreatment inspection.

Name(s) and Signature(s) of Inspector(s)

Dawn Keller/

Agency/Office/Telephone/Fax
ADEQ / Little Rock / 501-682-0659 / 501-682-0910

Date
04/23/2010

Signature of Reviewer

Agency/Office/Phone and Fax Numbers

Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Little Rock Wastewater

AFIN Number: 60-00409

NPDES Permit Number(s): AR0021806

Program Tracked under NPDES Permit Number: AR0040177

Fact Sheet Preparation Date: 04/22/2010

Date of Last PCI/Audit: 10/25/2007

Date of Last Annual Report: 03/31/2010

Name of Inspector: Dawn Keller/Lindsay Stoker

Date PCI Performed: 04/22/2010

Name, Title, and Telephone Number of Facility Representative:
Walter Collins, Plant Superintendent, 501-490-5402

Name and Title of Other Participants: Jeff Davis, Pretreatment

Number of IUs Visited: 3

Name(s) of IUs Visited: Falcon Jet, Interstate Signways,
Mountain Pure

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

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. Sage 5 Foods, Porocel Corp., Griffin Industries, Wes Pak Inc. (closed)

2. Has ADEQ or EPA been notified of these changes? yes

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** yes

4. What procedures are being used to update the IU Survey?
Procedures manual, telephone directory, Directory of Manufacturers, C.A. Manufacturing Directory, Business Licenses, C.A. Water Records, etc.

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 36

6. Number of Categorical Industrial Users: 14

7. How does the POTW determine the appropriate categorical standards to apply to an IU? 40 CFR has applicability requirements and they use these requirements as well as perform frequent inspections.

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Arkansas Painting and Specialty	Phosphate Coating	40 CFR 433
Cameron Valve	40 CFR 433	Steel Oil Field Valves

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? **Yes, manual is on file. Certified and updated.**

2. Describe any apparent problems with the local limits.
None

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		Comments:
		Permit:	Program:	
Metals:	4 times a yr	4 times a yr	4 times a yr	
Influent:				
Effluent:	4 times a yr	4 times a yr	4 times a yr	
Sludge:	12 times a yr	12 times a yr	12 times a yr	
Organics:				
Influent:	1 per yr	1 per yr	1 per yr	
Effluent:	1 per yr	1 per yr	1 per yr	
Sludge:	2 per yr	1 per yr	2 per yr	

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?
High BOD from Coleman Dairy began on Aug. 3, 2009. NOV letter sent to facility. No upsets at the plant.

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? 54

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: Jan. 31, 2012

Discharge limitations: Yes

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

IU self-monitoring requirements: Yes, Monthly.

IU reporting requirements: Yes

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

Sample location: Outfall 01

Type of sample: Composite and Grab

Monitoring frequency: 2 per yr

Bypass prohibition: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes, \$1000 per violation

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>Once a year</u>	<u>Annual</u>
other SIUs	<u>Twice a year</u>	<u>Annual</u>
Inspection:		
categorical IUs	<u>Annual and as needed</u>	<u>Annual</u>
other SIUs	<u>Annual</u>	<u>Annual</u>

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

3. Are inspections announced or unannounced? Both

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: Adequate

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? Track using received date and inspector reviews it.
-
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? Yes, generate a violation report. Must have 2 consecutive return to compliance reports.
-

17. What are the POTW's procedures for following up violations?
Inspector's track violations. Must have 2 in compliance consecutively. Tracked on an Excel spreadsheet.

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: **Adequate**

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, the ERP is in the procedures manual.
-
-

2. How does the POTW respond to the following violations?

Effluent limitations: Telephone call, NOV, request corrective action, violation report.

Late reports: Same as above

Unpermitted discharges: Same as above

Slug loads or spills: The magnitude may facilitate a written NOV.

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes
-
-

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
Interstate Signways	Effluent Cyanide and TRC	NOV, site visit, no longer accepting their waste	N/A

5. Comments on the POTW's enforcement procedures:

Adequate

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? Need 1 inspector but are adequate.

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? N/A

3. Does the POTW have copies of permits for IUs in other cities? N/A

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: N/A

This image shows a full page of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page, providing a template for handwriting practice or general writing. There are no margins, text, or other markings on the page.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Dassault Falcon Jet Corporation

POTW Name: Little Rock Wastewater

Industry Contacts: Peter R. Christiansen

Date and Time of Visit: 04/23/2010

Description of Manufacturing Process:

Metal machining, electroplating, aircraft paint stripping,
Surface preparation and painting, heat treating, upholstery,
Plastic molding, cabinetry.

Sources of Process Wastewater:

Process water treated and not released into sanitary sewer.

Categorical Industry? yes

Basis for Limits: BMR

Point of Application: pH adjustment, evaporation

Description of Pretreatment Equipment and Procedures:

No longer pretreating from this facility

Spill Prevention and Solvent Management Procedures:

Dikes, berms for containment, spill control kits, chemical
Desegregation, notification procedures.

Sampling Location and Equipment:

No Discharge

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Interstate Signways

POTW Name: Little Rock Wastewater

Industry Contacts: Wayne Davis

Date and Time of Visit: 04/26/2010

Description of Manufacturing Process:

Metal finishing/treating, silk screening and painting.

Sources of Process Wastewater:

Discharges from alkaline soap tank, deoxidizer tank, iodine tank, associated rinse water, silk screen rinse, chrome bearing, wastewater streams are processed thru pretreatment and batch discharge.

Categorical Industry? yes

Basis for Limits: BMR

Point of Application: _____

Description of Pretreatment Equipment and Procedures:

pH adjustment, pretreatment tanks, filter press.

Spill Prevention and Solvent Management Procedures:

Dikes/berms, grounding cables, MSDS lists,

Sampling Location and Equipment:

pH tank

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Mountain Pure Holdings, LLC

POTW Name: Little Rock Wastewater

Industry Contacts: Cheyenne Hendrix

Date and Time of Visit: 04/26/2010

Description of Manufacturing Process:

Water processing and bottling, fruit drink pasteurization and bottling, plastic and blow molding.

Sources of Process Wastewater:

Water into product, cooling tower evaporation, boiler makeup water.

Categorical Industry? no

Basis for Limits: MSDS

Point of Application: _____

Description of Pretreatment Equipment and Procedures:

pH adjustment of fruit drink wastes with sodium hydroxide prior to discharge.

Spill Prevention and Solvent Management Procedures:

N/A

Sampling Location and Equipment:

Manhole/grab.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Dawn Keller</u>	
NAME OF FACILITY:	<u>Little Rock Wastewater Utility</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021806</u>	NPID
DATE OF PCI:	<u>04/23/2010</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>36</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>14</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>1</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