



February 18, 2011

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

AFIN: 60-00409

NPDES Permit No.: AR0021806

Dear Mr. Corbitt:

On February 14, 2011, Eric Fleming and I performed a reconnaissance inspection of the Adams Field waste water treatment facility in response to a complaint. The complaint alleged that: "The treatment plant is experiencing problems with treatment of the activated sludge system. There have been several permit violations in the past 34 days as well as numerous times when heavy solids have been discharged through the plant effluent to the Arkansas River during the non-sampling days. The Director of Operations has insisted on process changes that have been proven not to work. The plant is being operated in a manner that isn't consistent with the Plant design, O & M Manual, and description in the NPDES Permit and ADEQ hasn't been notified of the changes in process procedures."

At this time the complaint was not found to be valid. The inspection was 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. If a plant upset were to occur, please remember to follow the notification requirements in your Permit.

Additionally, during the course of this inspection it was revealed that the Fourche Creek Facility, AR0040177, is using a cationic polymer in its treatment process. Documentation could not be located indicating that the Department had been notified of this change in the treatment process. It is a requirement of Part III.D.1 of your permit that any planned changes to the facility must be reviewed and approved prior to their implementation. Please contact Kim Fuller, ADEQ Permit's Branch, at 501-682-0643 or fuller@adeq.state.ar.us to discuss this change in your treatment process.

The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Water Division Enforcement Branch Manager. This response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct each item noted. This

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corrective action should be completed as soon as possible, and the written response with all necessary documentations (i.e. photos) is due by February 28, 2011.

If I can be any assistance, please contact me at keller@adeq.state.ar.us or 501-682-0658.

Sincerely,



Dawn Keller
Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="1"/> <input type="text" value="8"/> <input type="text" value="0"/> <input type="text" value="6"/>	11 <input type="text" value="1"/> 12 <input type="text" value="1"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="1"/> <input type="text" value="4"/>	17 <input type="text" value="R"/>	19 <input type="text" value="S"/>	20 <input type="text" value="1"/>	
Remarks					
<input type="text" value="A"/> <input type="text" value="F"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="6"/> <input type="text" value="0"/> <input type="text" value="-"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="4"/> <input type="text" value="0"/> <input type="text" value="9"/> <input type="text" value="P"/> <input type="text" value="U"/> <input type="text" value="L"/> <input type="text" value="A"/> <input type="text" value="S"/> <input type="text" value="K"/> <input type="text" value="I"/> <input type="text" value="C"/> <input type="text" value="O"/> <input type="text" value="U"/> <input type="text" value="N"/> <input type="text" value="T"/> <input type="text" value="Y"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 69	70 <input type="text" value="N"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text" value=""/> <input type="text" value=""/>	74 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 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- Adams Field POTW,
located at 1000 Temple, just east of the Little Rock Airport.

Entry Time/Date
14:00 on 02/14/2011

Permit Effective Date

November 1, 2006

Exit Time/Date
14:55 on 02/14/2011

Permit Expiration Date
December 31, 2011

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Stan Miller/Superintendent/Adam's Field Treatment Plant/Little Rock Wastewater/501-688-1543

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
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
M	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	S	Other: SSO

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

No violations were noted at the time of this inspection. A small amount of floc was observed flowing over the weirs of the secondary clarifiers.

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

Dawn Keller/

Agency/Office/Telephone/Fax

ADEQ / Little Rock / 501-682-0659 / 501-682-0910

Date

02/14/2011

Signature of Reviewer

Agency/Office/Phone and Fax Numbers

Date

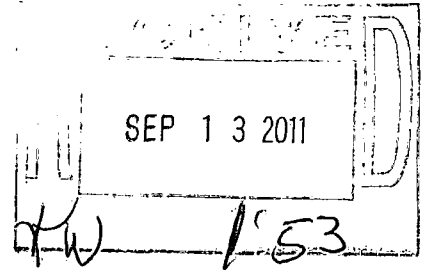
LRW Operations Division Receipt of Hand Delivered Mail

Date: September 13, 2011

To: Arkansas Department of Environmental Quality
Water Division, Enforcement Administrator

From: Stan Miller
Manager of Operations

Regarding: Adams Field Wastewater Treatment Plant
NPDES Permit No. AR0021806
Fecal Coliform Bacteria Monthly Average Permit Violation



On behalf of the Arkansas Department of Environmental Quality (ADEQ), I hereby acknowledge receipt of the letter dated September 13, 2011 from Stan Miler of Little Rock Wastewater addressed to ADEQ - NPDES Branch referencing the Fecal Coliform Bacteria Monthly Average Permit Violations for permit AR0021806.

☐ Accepted By: *L. Nuttall*
☐ Picked Up By: Arkansas Department of Environmental Quality

09-13-11
Date

☐ Delivered By: *Craig Foster*
☐ Picked Up By: Little Rock Wastewater Utility

9-13-2011
Date



September 13, 2011

Mr. Jason Bolenbaugh
Enforcement Analyst
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: NPDES Permit Number AR0021806,
Adams Field WWTP
Fecal Coliform Bacteria 30-Day Geometric Average Permit Violation

Dear Mr. Bolenbaugh;

The 30-Day average for effluent Fecal Coliform Bacteria during the month of August exceeded the NPDES permit limit of 200 colonies/100 mLs, with a laboratory verified value of 252 colonies/100 mLs.

A 7-Day Geometric Average Fecal Coliform Bacteria permit violation occurred during the week of August 7 – August 13, 2011, with a count of 594 colonies/100 mLs, resulting in the facility's inability to meet the monthly permit limit. Subsequent weekly final effluent permit limits of 400 colonies/100 mLs were met however results were not sufficient to lower the monthly average below the permit requirement. The weekly violation was a direct result of excessive inventory that was present in the thickener, aeration tank, and final clarifier units due to a restriction in the solid transfer line to the Little Rock Wastewater Fourche Creek facility. The full capacity of the line has been restored via an incremental series of hard nose pig launches ranging between eight inch (8") and eleven and one half inch (11 ½") diameter.

Corrective measures have been implemented to prevent future occurrence by:

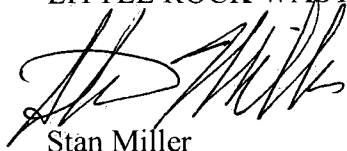
- Scheduled Preventative Maintenance for Pigging of Transfer Line -
One Month Frequency Automated Work Order Production

- Scheduled Proactive Maintenance of the UV Disinfection System – Replacement of two (2) complete channels of UV Lamps and Seal Kits (50% System Replacement)..

If you have any questions concerning this letter, or if we can provide additional information please contact me at 688-1483.

Sincerely,

LITTLE ROCK WASTEWATER UTILITY

A handwritten signature in black ink, appearing to read 'Stan Miller', is written over the printed name.

Stan Miller

Manager of Operations