



ARKANSAS
Department of Environmental Quality

April 19, 2010

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

AFIN: 60-00274, NPDES Permit No: AR0020303, ARR000067, Routine Compliance Inspection, Pretreatment Compliance Inspection

Dear Mr. Mills:

On April 7 and 8, 2011, I performed a routine compliance inspection of the above referenced facility 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 inspection revealed the following:

Faulkner Lake Wastewater Treatment Plant (AR0020303) – The grit removal unit processes were not being operated. The wastewater is being allowed to flow through the units, but they are not being used as designed. It is my understanding that NLR Wastewater intends to replace these units sometime in the future. In the interim the units are not being operated or maintained. There was extensive corrosion of this unit process. This is a violation of Part II, B.1 of the permit which requires all units of treatment and control to be properly operated and maintained at all times.

Faulkner Lake Wastewater Treatment Plant (ARR000067 Stormwater No Exposure Certification) – The following violations of the “No Exposure” certification were noted:

1. At the time of the inspection, operators were cleaning up around the sludge filter press and covered dumpsters with soap and a hose. This wastewater was running off the parking lot and was not being routed to the sewer.
2. There is a used/old equipment laydown yard on the southwest corner of the facility. Stormwater runoff from the equipment laydown yard will flow to the wetlands in the southwest corner of the facility.

NLR Wastewater Industrial Pretreatment Program – No violations were noted.

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 corrective action should be completed as soon as possible, and the written response with all necessary documentations (i.e. picture) is due by April 29, 2011.

Gary Mills, NLR Faulkner Lake Plant
April 19, 2010
Page 2

If I can be any assistance, please contact me at benson@adeq.state.ar.us or 501-683-0827.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Benson". The signature is cursive and fluid, with the first name "Dennis" and last name "Benson" clearly distinguishable.

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

NPDES Compliance Inspection Report

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

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	1	1	0	4	0	8	17	18	C	19	S	20	1																																																						
Remarks																																																																																		
<table border="1"> <tr> <td colspan="6">Inspection Work Days</td> <td colspan="6">Facility Evaluation Rating</td> <td colspan="2">BI</td> <td colspan="2">QA</td> <td colspan="10">-----Reserved-----</td> </tr> <tr> <td>67</td><td></td><td></td><td></td><td></td><td></td><td>70</td><td>3</td><td>71</td><td>N</td><td>72</td><td>N</td><td>73</td><td></td><td></td><td>74</td><td>75</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>80</td> </tr> </table>																												Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----										67						70	3	71	N	72	N	73			74	75												80
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----																																																																		
67						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*)

NLR Wastewater Utility, Faulkner Lake Plant- 7400 Baucum Pike, NLR, AR

Entry Time/Date

09:15 am on 04/08/11

Permit Effective Date

4/1/2008

Exit Time/Date

10:27 am on 04/08/11

Permit Expiration Date

3/31/2013

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

Ric Roll

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number

Gary Mills
NLR WASTEWATER UTILITY
PO Box 17898
North Little Rock, AR 72117
501-945-7186

Contacted

Yes ☐ No ☒

Section C: Areas Evaluated During Inspection

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

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

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

The grit removal unit processes were not being operated. The wastewater is being allowed to flow through the units, but they are not being used as designed. It is my understanding that NLR Wastewater intends to replace these units sometime in the future. In the interim the units are not being operated or maintained. There was extensive corrosion of this unit process. This is a violation of Part II, B.1 of the permit which requires all units of treatment and control to be properly operated and maintained at all times.

The facility is also in noncompliance with its "No Exposure" Certification.

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

Dennis Benson

Agency/Office/Telephone/Fax

AR Dept. of Environmental Quality-
(501) 683-0827/(501) 682-0910 (Fax)

Date

04/08/11

Signature of Reviewer

Agency/Office/Phone and Fax Numbers

Date

SECTION A: PERMIT VERIFICATIONPERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☒S ☐M ☐U ☐NA ☐NE

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: ☒Y ☐N ☐NA ☐NE2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: ☐Y ☐N ☒NA ☐NE3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: ☒Y ☐N ☐NA ☐NE4. 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 ☐NE2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: ☒S ☐M ☐U ☐NA ☐NEa. DATES AND TIME(S) OF SAMPLING: ☒Y ☐N ☐NA ☐NEb. EXACT LOCATION(S) OF SAMPLING: ☒Y ☐N ☐NA ☐NEc. NAME OF INDIVIDUAL PERFORMING SAMPLING: ☒Y ☐N ☐NA ☐NEd. ANALYTICAL METHODS AND TECHNIQUES: ☒Y ☐N ☐NA ☐NEe. RESULTS OF CALIBRATIONS: ☒Y ☐N ☐NA ☐NEf. RESULTS OF ANALYSES: ☒Y ☐N ☐NA ☐NEg. DATES AND TIMES OF ANALYSES: ☒Y ☐N ☐NA ☐NEh. NAME OF PERSON(S) PERFORMING ANALYSES: ☒Y ☐N ☐NA ☐NE3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: ☒S ☐M ☐U ☐NA ☐NE4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: ☒S ☐M ☐U ☐NA ☐NE5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: ☒Y ☐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: ☐S ☐M ☒U ☐NA ☐NE2. TREATMENT UNITS PROPERLY MAINTAINED: ☐S ☐M ☒U ☐NA ☐NE3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: ☒S ☐M ☐U ☐NA ☐NE4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: ☒S ☐M ☐U ☐NA ☐NE5. ALL NEEDED TREATMENT UNITS IN SERVICE: (grit unit is not in service) ☐S ☒M ☐U ☐NA ☐NE6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: ☒S ☐M ☐U ☐NA ☐NE7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: ☐S ☐M ☐U ☐NA ☒NE8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: ☒Y ☐N ☐NA ☐NE9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: ☒Y ☐N ☐NA ☐NE10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: ☒Y ☐N ☐NA ☐NE11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: ☒Y ☐N ☐NA ☐NE12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: ☒Y ☐N ☐NA ☐NE13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: ☒Y ☐N ☐NA ☐NE14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: ☐Y ☒N ☐NA ☐NE15. 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:	<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 type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION E: FLOW MEASUREMENT**PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS**☒S ☐M ☐U ☐NA ☐NE**DETAILS:**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:___ TYPE OF DEVICE: <u>4' parshall flume</u>	<input checked="" 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input 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

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) :	<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 $\geq 10\%$ 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 $\geq 10\%$ 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 type="checkbox"/> Y <input checked="" 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 type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY

☒S ☐M ☐U ☐NA ☐NEDETAILS: Outfall only, receiving stream, Arkansas River, was not checked

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	None	None	None	None	None

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS

☒S ☐M ☐U ☐NA ☐NE

DETAILS:

- | | |
|---|---|
| 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: | <input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> 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: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___ | |
| 3. SAMPLES PRESERVED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. FLOW PROPORTIONED SAMPLES OBTAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SAMPLE SPLIT WITH PERMITTEE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS

☐S ☐M ☒U ☐NA ☐NE

DETAILS:

- | | |
|--|--|
| 1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___ | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. POLLUTION PREVENTION TEAM IDENTIFIED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. LIST OF POTENTIAL POLLUTANT SOURCES: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. LIST OF STRUCTURAL BMPs: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. LIST OF NON-STRUCTURAL BMPs: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 10. BMPs PROPERLY OPERATED AND MAINTAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 11. INSPECTIONS CONDUCTED AS REQUIRED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |

FLOW CALCULATION SHEET

Date: 4/08/11 Time: 09:30Head in Inches: 6.25 Feet: Type & Size of Primary Flow Measurement Device:
4' Parshall flumeName & Model of Secondary Flow Measurement Device:
Milltronics OCM IIRecorded Flow at Date & Time Listed Above: 3.914 (Facility Flow Meter)Calculated Flow at Date & Time Listed Above: 3.684
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

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

$$\% \text{ Error} = \frac{3.914 - 3.684}{3.684} \times 100$$

$$\% \text{ Error} = \frac{.230}{3.684} \times 100$$

$$\% \text{ Error} = \frac{.062}{} \times 100$$

$$\% \text{ Error} = \frac{6.2}{} \%$$

Comments:

DMR Calculation Check

Reporting Period: From 11 01 01 To 11 01 31
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>317.9</u>	<u>8.8</u>	<u>10.6</u>
Calculated Value:	<u>317.9</u>	<u>8.8</u>	<u>10.6</u>
Permit Value:	<u>3002</u>	<u>30</u>	<u>45</u>

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period: From 11 01 01 To 11 01 31
Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>214.9</u>	<u>6.0</u>	<u>8.2</u>
Calculated Value:	<u>214.9</u>	<u>6.0</u>	<u>8.2</u>
Permit Value:	<u>3002</u>	<u>30</u>	<u>45</u>

If calculated value does not equal reported value, explain:

NPDES Compliance Inspection Report
Further Explanation

Location:	NLR Wastewater Utility						
Photographer:	Dennis Benson				Witness:	None	
Photo #	1	Of	4		Date:	4/08/11	Time: 09:26 am
Description:	Lots of corrosion on inoperable grit removal.						



Photographer:	Dennis Benson				Witness:	None	
Photo #	2	Of	4		Date:	4/08/11	Time: 09:45 am
Description:	Old equipment lay down yard that is exposed to precipitation that runs off the property.						



ADEQ

ARKANSAS
Department of Environmental Quality

Photographic Evidence Sheet

Location:	NLR Wastewater Utility						
Photographer:	Dennis Benson				Witness:	None	
Photo #	3	Of	4		Date:	4/08/11	Time: 09:46 am
Description:	Another view of old equipment lay down yard in southwest corner of facility.						



Photographer:	Dennis Benson				Witness:	None	
Photo #	4	Of	4		Date:	04/08/11	Time: 09:21 am
Description:	Soapy water runoff from housekeeping at the sludge processing area.						



From: [Garner, Cindy](#)
To: [Allen-Daniel, Leslie](#)
Subject: FW: Response to Routine Compliance Inspection at Faulkner Lake, NPDES Permit No. AR0020303
Date: Thursday, April 28, 2011 1:09:36 PM

[Please save to PDS # 058191 and Zylab.](#)

From: Garner, Cindy
Sent: Thursday, April 28, 2011 1:09 PM
To: 'RRoll@northlittlerock.ar.gov'
Subject: RE: Response to Routine Compliance Inspection at Faulkner Lake, NPDES Permit No. AR0020303

Ric,

Your response due date has been extended to May 13, 2011.

Cindy

From: RRoll@northlittlerock.ar.gov [mailto:RRoll@northlittlerock.ar.gov]
Sent: Thursday, April 28, 2011 12:19 PM
To: Garner, Cindy
Subject: Response to Routine Compliance Inspection at Faulkner Lake, NPDES Permit No. AR0020303

Cindy,

Dennis Benson inspected our Faulkner Lake plant on April 7th and 8th, 2011. We received his report of findings on April 20, 2011. There were three areas of concern which are going to involve further planning and discussion before a definitive report and schedule can be generated. It has been difficult to get the appropriate people together to discuss these issues due to storm activities and repair. Our response is due this Friday, April 29, 2011. I am requesting an extension for our response due to these circumstances and the upcoming AWWWEA conference in Hot Springs. Thanks.

Emric F. Roll
Superintendent of Operations
North Little Rock Waste Water Utility
7400 Baucum Pike P.O. Box 17898
North Little Rock, AR 72117
(501) 945-7186
RRoll@northlittlerock.ar.gov

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From: [Garner, Cindy](#)
To: [Allen-Daniel, Leslie](#)
Subject: FW: Response to Routine Compliance Inspection, Pretreatment Compliance Inspection, AFIN: 60-00274, NPDES Permit No. AR0020303, ARR000067
Date: Friday, May 13, 2011 1:31:21 PM
Attachments: [Lagoon area FL 05132011.JPG](#)
[Lagoon area 2 FL 05132011.JPG](#)
[Lagoon area 3 FL 05132011.JPG](#)
[Lagoon area 6 FL 05132011.JPG](#)
[Lagoon area 8 FL 05132011.JPG](#)
[ADEQ Document0001.jpg](#)

Please save to Zylab and PDS.

From: RRoll@northlittlerock.ar.gov [mailto:RRoll@northlittlerock.ar.gov]
Sent: Friday, May 13, 2011 1:18 PM
To: Garner, Cindy
Cc: GMills@northlittlerock.ar.gov; MWilkins@northlittlerock.ar.gov; BStaggs@northlittlerock.ar.gov; BCourtney@northlittlerock.ar.gov
Subject: Response to Routine Compliance Inspection, Pretreatment Compliance Inspection, AFIN: 60-00274, NPDES Permit No. AR0020303, ARR000067

Dear Ms. Garner:

Our Faulkner Lake plant site was inspected by Dennis Benson, District 9 Field Inspector, Water Division on April 7 and 8, 2011. Listed below are the findings and our responses to said inspection:

Faulkner Lake Wastewater Treatment Plant (AR0020303)

Finding: "The grit removal unit processes were not being operated. The wastewater is being allowed to flow through the units, but they are not being used as designed. It is my understanding that NLR Wastewater intends to replace these units sometime in the future. In the interim the units are not being operated or maintained. There was extensive corrosion of this unit process. This is a violation of Part II, B.1 of the permit which requires all units of treatment and control to be properly operated and maintained at all times."

Response: The grit chamber units are being refurbished to operating standards and will be put into service around July, 2011. As a side note, we are planning to modify our grit removal procedures in our next scheduled upgrade (see attached letter from ADEQ dated October 6, 2010.) This will eliminate the existing grit removal units.

Faulkner Lake Wastewater Treatment Plant (ARR000067 Stormwater No Exposure Certification)

Finding: "At the time of the inspection, operators were cleaning up around the sludge filter press and covered dumpsters with soap and a hose. This wastewater was running off the parking lot and was not being routed to the sewer."

Response: The dumpster staging area is where the belt pressed biosolids are collected prior to being transported to American Composting for further processing. There is a floor channel drain surrounding the dumpster area on three sides. Most of the liquid that drains from the dumpsters during the loading process is channeled to these drains. When the operator cleans the area with soap, deodorizer and water, some liquid escapes into the roadway and parking lot which then drains into a grass yard area. We have purchased a spill containment berm system which will surround all four sides of the dumpster area. This berm system will ensure that all dumpster runoff and wash water will be channeled into the existing drains which return to the plant for further processing.

Finding: "There is a used/old equipment laydown yard on the southwest corner of the facility. Stormwater runoff from the equipment laydown yard will flow to the wetlands in the southwest corner of the facility."

Response: We are reworking this storage area by adding curbs and gutters to channel any water runoff to the sewer drain which is located on the southeast side of the lagoons. Since receipt of the

inspection report, we have initiated efforts to relocate equipment and materials to an area where it will drain towards our lagoons. This will clear the area in question and allow a contractor to install the curbing and gutters. Relocation of the existing materials and equipment will be completed by May 20, 2011. We project completion of the contracted installation of curbing and gutters by June 30, 2011. See attached pictures showing current progress – pictures of the completed project will be sent when finished.

Emric F. Roll
Superintendent of Operations
North Little Rock Waste Water Utility
7400 Baucum Pike P.O. Box 17898
North Little Rock, AR 72117
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June 27, 2011

Emric Roll
North Little Rock Waste Water Utility
7400 Baucum Pike
P.O. Box 17898
North Little Rock, AR 72117

RE: AFIN: 60-00274

NPDES Tracking No.: AR0020303

Dear Mr. Roll:

The Department has received your response to the April 28, 2011 inspection of your facility by our District Field Inspector, Dennis Benson. Your letter appears to adequately address the discrepancies identified during the visit. The Department looks forward to receiving your letter notifying the Department of the completion of the corrective actions. Please include photos of the effective areas upon completion. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

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

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0823 or you may e-mail me at suel@adeq.state.ar.us.

Sincerely,

Kevin Suel
Enforcement Analyst
Water Division Enforcement Branch