



May 16, 2012

Mr. Stanley Miller
Manager of Operations
Little Rock Wastewater
11 Clearwater Drive
Little Rock, AR 72204

Little Rock Wastewater Peak Attenuation Facility and AFIN: 60-00409; NPDES Permit No.: AR0021806 (Adams Field WWTP); ARR00A001; and Pretreatment Compliance Inspection (PCI)

Dear Mr. Miller:

On May 3, 2012 and May 4, 2012; Dennis Benson, Inspector, ADEQ Water Division and I performed a routine compliance inspection of the waste water treatment facility and the No-Exposure Certification in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. Additionally, a Pretreatment Compliance Inspection (PCI) was conducted. The following violations were revealed at the time of inspection:

Little Rock Wastewater Peak Attenuation Facility

- 1) Evidence of erosion and migration of soils was observed on a slope at this site (see photo of 3 and 4 of 4). Final stabilization is needed at this area.

ARR00A001

- 2) The facility was issued a Notice for No Exposure Exclusion under the Industrial Stormwater General Permit, AR000000 (Permit Tracking No. ARR00A001) on September 20, 2010. All of the conditions under which the "No Exposure" Exclusion was issued were not verified during the site inspection. Specifically, soil was being excavated from the site; additionally, fluid was observed leaking from a drainage hose attached to a grease trap container; a portion of the fluid did not drain to the collection system. The conditions stated above are not eligible under the No Exposure Exclusion (ARR00A001) issued to this facility.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted.

Mr. Stanley Miller, Little Rock Wastewater
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This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by May 28, 2012. If I can be of any assistance, please contact me 501-682-0658 or parkerr@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Risa Parker".

Risa Parker
District 9 Field Inspector
Water Division

cc: 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	N	2	5	3	A	R	0	0	2	1	8	0	6	1	2	0	5	0	4	P	S	1					
Remarks																											
A		F		I		N		6		0		-		0		0		4		0		9					
Inspection Work Days				Facility Evaluation Rating				BI		QA		Reserved															
67				69				70		N		71		N		72		N		73		74		75		80	

Section B: Facility Data

Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>)		Entry Time/Date	Permit Effective Date
Little Rock Wastewater—Adams Field POTW: located at 1000 Temple; east of the Little Rock National Airport.		8:45 am on 5/3/12	01/01/2007
		Exit Time/Date	Permit Expiration Date
		10:45 am on 5/3/12	12/31/2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)			Other Facility Data
Mr. Jeff Davis, Pretreatment Supervisor, Little Rock Wastewater, 501-688-1495			
Name, Address of Responsible Official/Title/Phone and Fax Number		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Mr. Stanley Miller Little Rock Wastewater 11 Clearwater Drive Little Rock, AR 72204			
PDS #065659			

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
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	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)

Please refer to the attached Pretreatment Compliance Inspection Report.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Risa Parker/	ADEQ / Little Rock / 501-682-0658 / 501-682-0910	May 9, 2012
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: 60-01021; 60-00409

NPDES Permit Number(s): AR0040177 and AR0021806

Program Tracked under NPDES Permit Number: AR0021806

Fact Sheet Preparation Date: 5/4/12

Date of Last PCI/Audit: 2010

Date of Last Annual Report: 2011 Annual Report

Name of Inspector: Risa Parker and Dennis Benson

Date PCI Performed: 5/4/12

Name, Title, and Telephone Number of Facility Representative:
Jeff Davis, Pretreatment Supervisor, Little Rock Wastewater
501-688-1495

Name and Title of Other Participants: _____

Number of IUs Visited: 2

Name(s) of IUs Visited: Odoms Sausage and Interstate Signs

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. Accessories Marketing
 2. Has ADEQ or EPA been notified of these changes? Will be updated in next annual report to ADEQ.
 3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes
 4. What procedures are being used to update the IU Survey? Business licenses, business guide, phone book, drive by, Newspapers, Central Arkansas Water (over 730 ccf) and construction plans.
 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) 22
 6. Number of Categorical Industrial Users: 14
 7. How does the POTW determine the appropriate categorical standards to apply to an IU? SIC codes; industry reporting, and site 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:
- Refer to 2011 Annual Report.

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? **Yes; to industries where pollutants of concern have been determined.**

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

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:				
Influent:	<u>4x year</u>	<u>4x year</u>	<u>4x year</u>	<u></u>
Effluent:	<u>4x year</u>	<u>4x year</u>	<u>4x year</u>	<u></u>
Sludge:	<u>12x year</u>	<u>12x year</u>	<u>12x year</u>	<u></u>
Organics:				
Influent:	<u>1x year</u>	<u>1x year</u>	<u>1x year</u>	<u></u>
Effluent:	<u>1x year</u>	<u>1x year</u>	<u>1x year</u>	<u></u>
Sludge:	<u>2x year</u>	<u>2x year</u>	<u>2x year</u>	<u></u>

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?
None

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Permit
2. How many IU permits (or other control documents) have been issued? 2011 (11 significant)
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: Yes
 Discharge limitations: Yes
 If the program requires self-monitoring by the IUs, do the Permits contain:
 IU self-monitoring requirements: Yes
 IU reporting requirements: Yes
5. Indicate which of the following recommended standard conditions are contained in the control documents:
 Sample location: Yes
 Type of sample: Yes
 Monitoring frequency: Yes
 Bypass prohibition: Yes
 Right of entry: Yes
 Nontransferability: Yes
 Revocation clause: Yes
 Penalty Provisions: Yes
 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>2 yr</u>	<u>1 yr</u>
other SIUs	<u>1 yr</u>	<u>1 yr</u>
Inspection:		
categorical IUs	<u>1 yr</u>	<u>1 yr</u>
other SIUs	<u>1 yr</u>	<u>1 yr</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 methods

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? Yes

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

17. What are the POTW's procedures for following up violations?
A telephone call and if applicable; an inspection and sampling event is conducted.

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:

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes

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

Effluent limitations: Follows Enforcement Response Plan

Late reports: Follows Enforcement Response Plan

Unpermitted discharges: Follows Enforcement Response Plan

Slug loads or spills: Follows Enforcement Response Plan

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)? No significant violators published for 2011.

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:

5. Comments on the POTW's enforcement procedures:

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? **Yes**

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? **Yes**

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: **No comments at this time.**

H. EVALUATION AND COMMENTS

[illegible]

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Risa Parker</u>	
NAME OF FACILITY:	<u>Little Rock Wastewater</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0021806</u>	NPID
DATE OF PCI:	<u>5/4/12</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>22</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>0</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

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Interstate Highway Signs (Located within Little Rock Port Authority)

Industry Contacts: John Hoover

Type of Industry: Electroplating

Date of Visit: 5/4/12

- | | | | |
|--|--------------------------------|-------------------------------|---|
| 1. Significant industrial user: | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6. Solvent management/TTO control? | <input type="checkbox"/> Yes | ✓ <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 7. Suitable sampling location? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures / equipment? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 9. Adequate spill prevention? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 10. Industry familiar with limits and requirements? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

Additional Comments: This is a Federal Categorical User

Visit Conducted By:  Date: 5/9/12

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Odoms Tennessee Pride Sausage

Industry Contacts: Jonathan Rhodes

Type of Industry: Food manufacturing (sausage)

Date of Visit: 5/4/12

- | | | | |
|--|--------------------------------|-------------------------------|---|
| 1. Significant industrial user: | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | <input type="checkbox"/> Yes | ✓ <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6. Solvent management/TTO control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | ✓ <input type="checkbox"/> N/A |
| 7. Suitable sampling location? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures / equipment? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 9. Adequate spill prevention? | <input type="checkbox"/> Yes | ✓ <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 10. Industry familiar with limits and requirements? | ✓ <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

Additional Comments: Grease waste was observed to be running off the perimeter of the site.

Visit Conducted By:  Date: 5/9/12