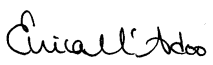

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT							
		AFIN: 60-00409		PERMIT #: AR0021806		DATE: 9/10/2014			
		COUNTY: 60 Pulaski			PDS #: 080340		MEDIA: WN		
		GPS LAT:		LONG:		LOCATION: General Area			
FACILITY INFORMATION				INSPECTION INFORMATION					
NAME: Little Rock Waste Water- Adams LOCATION: Pretreatment CITY: Little Rock				FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 27312 S - State			
RESPONSIBLE OFFICIAL NAME: / TITLE Jeff Davis / Pretreatment Supervisor COMPANY: Little Rock Waste Water- Adams Field MAILING ADDRESS: 11 Clearwater Dr CITY, STATE, ZIP: Little Rock AR 72204 PHONE & EXT: / FAX: / EMAIL:				FACILITY EVALUATION RATING: 5 - Satisfactory		INSPECTION TYPE: Pretreatment Compliance			
				DATE(S): 9/10/2014		ENTRY TIME: 09:00		EXIT TIME: 15:00	
				PERMIT EFFECTIVE DATE: 9/1/2014		PERMIT EXPIRATION DATE:			
				FAYETTEVILLE SHALE RELATED: N					
FAYETTEVILLE SHALE VIOLATIONS: N				INSPECTION PARTICIPANTS					
CONTACTED DURING INSPECTION: ***				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Jeff Davis, Pretreatment Supervisor					
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)									
S	PERMIT	S	FLOW MEASUREMENT	S	STORMWATER				
S	RECORDS/REPORTS	S	LABORATORY	S	FACILITY SITE REVIEW				
S	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM				
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT				
**	OTHER:								
SUMMARY OF FINDINGS									
No violations noted during inspections. Inspections were conducted at Industrial Users: Welspun, Interstate Signs, and Sage V Foods.									
GENERAL COMMENTS									
INSPECTOR'S SIGNATURE:  Erica McAdoo						DATE: 10/15/2014			
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh						DATE: 10/15/2014			

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Little Rock Waste Water- Adams Field WWTF

AFIN Number: 60-00409

NPDES Permit Number(s): AR0021806

Program Tracked under NPDES Permit Number: AR0021806

Fact Sheet Preparation Date: 9/10/14

Date of Last PCI/Audit: 5/9/12

Date of Last Annual Report: 3/31/14

Name of Inspector: Erica McAdoo

Date PCI Performed: 9/10/14

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

Name and Title of Other Participants: Stanley Suel; Walter
Collis; Tracy Pearson; Cornelius Jones; Susan Ledbetter; Mikel
Murder

Number of IUs Visited: 3

Name(s) of IUs Visited: Welspun; Interstate Signs; Sage V Foods

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. Odoms TN Pride- deleted
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?
Business licenses, business guide, phone book, drive by, newspaper, CAW, 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) 37
6. Number of Categorical Industrial Users: 16
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 2014 Annual Report		

B. LOCAL LIMITS

1. **IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA?** Yes, local limits are applied 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>4 times/year</u>	<u>4 times/year</u>	<u>4 times/year</u>	<u></u>
Effluent:	<u>4 times/year</u>	<u>4 times/year</u>	<u>4 times/year</u>	<u></u>
Sludge:	<u>12 times/year</u>	<u>6 times/year</u>	<u>6 times/year</u>	<u></u>
Organics:				
Influent:	<u>1 time/year</u>	<u>1 time/year</u>	<u>1 time/year</u>	<u></u>
Effluent:	<u>1 time/year</u>	<u>1 time/year</u>	<u>1 time/year</u>	<u></u>
Sludge:	2times/year	1 time/year	1 time/year	

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? 37 significant permits total (2014)
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.**

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>1 /year (2/year IUSM)</u>	<u>1 /year</u>
other SIUs	<u>1 /year</u>	<u>1 /year</u>
Inspection:		
categorical IUs	<u>1 /year</u>	<u>1 /year</u>
other SIUs	<u>1 /year</u>	<u>1 /year</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: _____

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, total flow and end of process.

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? The following forms are used: PRCC checklist, Baseline Monitoring Report checklist, Industrial Self Monitoring Evaluation Form.

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, violation reports summarize violations, corrective actions, and return to compliance.

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 ERG with violation report.

Late reports: Follows ERG.

Unpermitted discharges: Follows ERG.

Slug loads or spills: Follows ERG and 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 2013

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.

[illegible]

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. MULTI JURISDICTIONAL 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: _____

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Welspun Tubular LLC

POTW Name: Fourche Creek Waste Water Treatment Facility

Industry Contacts: Martin Cain, HSE Director 501-301-8800

Date and Time of Visit: 9/10/14

Description of Manufacturing Process:

During pipe manufacturing process, the pipes are cooled with water prior to a phosphate coating, then cooled again

Sources of Process Wastewater:

HFW Forming mill; external phosphate coating

Categorical Industry? 40 CFR 403.12(d) Metal Finishing Pretreatment Standard

Basis for Limits: Potentially harmful substances

Point of Application: End of Process

Description of Pretreatment Equipment and Procedures:

pH Neutralization via Phosphoric acid

Skimming of surface oil

Spill Prevention and Solvent Management Procedures:

Floors slope to internal waste water drains, where the water is treated for pH adjustments. The treated water is then conveyed to the sewer system.

Sampling Location and Equipment:

Outfall 001 Private manhole located near the NW corner of the property. (Automatic composite sample)

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Sage V Foods

POTW Name: Little Rock Waste Water

Industry Contacts: Buddy Curtis 501-492-3735

Date and Time of Visit: 9/11/14

Description of Manufacturing Process:

Rice cooking, Rice Drying, Rice Freezing, Packaging

Sources of Process Wastewater:

Process water from cooking, equipment cleaning, and freezer coil defrosting.

Due to discharge approximately 240,000 gallons of process waste water per day

Categorical Industry? Significant IU

Basis for Limits: pH, BOD5, BOD, TSS, TS, Temp

Point of Application: End Process

Description of Pretreatment Equipment and Procedures:

Outfall 01: Treatment system effluent rice cooking process wastewater entering process Wastewater Lift Station to the high strength wastewater force main

Outfall 02: Treatment system effluent equipment sanitizing wastewater before combining with domestic wastewater and entering the Domestic Waste Water Lift Station

Outfall 03: Facility discharge entering the Domestic Waste Water Collection System

Spill Prevention and Solvent Management Procedures:

Spill Slug Control Plan

Sampling Location and Equipment:

Siemens OCM III (Flume)

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Interstate Highway Signs Corp.

POTW Name: Little Rock Waste Water

Industry Contacts: Mark Carter, Operations Manager

Date and Time of Visit: 9/11/14

Description of Manufacturing Process:
Manufactures highway guide, regulatory, and warning signs fabricated from metal or extruded panels. Sign board processing may include the metal finishing application of an alodine coating to aluminum sheets or panels.

Sources of Process Wastewater:
Waste water generation at the facility includes discharges from the alkaline soap tank, deoxidizer tank, alodine tank, associated rinse waters and silk screen rinse waters. Approximately 78.49cuft of waste water are discharged into the sewer monthly

Categorical Industry? yes

Basis for Limits: Cd, Cr, Cu, Pb, Ni, Ag, Zn

Point of Application: _____

Description of Pretreatment Equipment and Procedures:
Chrome bearing wastewater streams are processed through pretreatment and batch discharges to the sanitary sewer.

Spill Prevention and Solvent Management Procedures:
Spill/ Slug Control Plan on file with LRW

Sampling Location and Equipment:
24 hour composite sample; Outfall 01 Process wastewater

discharge to private manhole and flowing into LRWW collection
system
