ADEQ

A R K A N S A S
Department of Environmental Quality

May 15, 2017

Marc E. Wilkins
City of North Little Rock
P.O. Box 17898
North Little Rock, AR 72117

RE: Faulkner Lake WWTF Inspection
AFIN: 60-00274 Permit No.: AR0020303

Dear Mr. Wilkins,

On March 8, 2017, I performed a Pretreatment 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. A copy of the inspection report is enclosed for your records.

No violations were observed during this inspection. Please refer to the attached inspection report for any comments.

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

Sincerely,

Erica McAdoo
District 9 Field Inspector
Office of Water Quality

ADEQ
ARKANSAS
Department of Environmental Quality

WATER DIVISION INSPECTION REPORT

AFIN: **60-00274**	PERMIT #: **AR0020303**	DATE: **3/8/2017**
COUNTY: **60 Pulaski**	PDS #: **097023**	MEDIA: **WN**
GPS LAT: **34.7390** LONG: **-92.1798** LOCATION: **General Area**		

FACILITY INFORMATION

NAME:
Faulkner Lake WWTF
LOCATION:
7400 Baucum Pike
CITY:
North Little Rock

RESPONSIBLE OFFICIAL

NAME: / TITLE
Marc E. Wilkins /
COMPANY:
City of North Little Rock
MAILING ADDRESS:
P.O. Box 17898
CITY, STATE, ZIP:
North Little Rock AR 72117
PHONE & EXT: / FAX:
501-945-4752 /
EMAIL:
swayson@nlrwu.com
CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**
INSPECTOR ID#: **27312 S - State**
FACILITY EVALUATION RATING: **5 - Satisfactory**
INSPECTION TYPE: **Pretreatment Compliance**
DATE(S): **3/8/2017**
ENTRY TIME: **09:00**
EXIT TIME: **13:00**
PERMIT EFFECTIVE DATE: **4/1/2014**
PERMIT EXPIRATION DATE: **3/31/2019**
FAYETTEVILLE SHALE RELATED: ***
FAYETTEVILLE SHALE VIOLATIONS: ***

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Mitch Foreman, NLR

AREA EVALUATIONS

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

S	PERMIT	**N**	FLOW MEASUREMENT	**S**	STORMWATER
S	RECORDS/REPORTS	**N**	LABORATORY	**S**	FACILITY SITE REVIEW
S	OPERATION & MAINTENANCE	**S**	EFFLUENT/RECEIVING WATER	**S**	SELF-MONITORING PROGRAM
**	SAMPLING	**S**	SLUDGE HANDLING/DISPOSAL	**S**	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

This facility is well maintained and operated in an extremely efficient manner.
I did not observe any violations during this inspection.

GENERAL COMMENTS

During this Pretreatment Compliance Inspection, I visited three facilities: Koppers, Blue Beacon, and Loreal. The following observations were made during this inspection.

Koppers:

- **No violations were observed**

Truck-O-Mat:

- **No violations were observed**

Loreal:

- **No violations were observed**

INSPECTOR'S SIGNATURE: Erica McAdoo **Erica McAdoo** DATE: **5/4/2017**

SUPERVISOR'S SIGNATURE: Clark Baker **Clark Baker** DATE: **5/12/2017**

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Koppers

Industry Contacts: Dusty McDaniel

Type of Industry: Railroad tie preservation/ Wood preservation

Date of Visit: 3/8/2017

1.	**Significant industrial user:**	**X Yes**	**No**	**N/A**
2.	**Pretreatment equipment or procedures?**	**X Yes**	**No**	**N/A**
3.	**Pretreatment equipment maintained and operational?**	**X Yes**	**No**	**N/A**
4.	**Hazardous waste generated or stored?**	**X Yes**	**No**	**N/A**
5.	**Proper solid waste disposal?**	**X Yes**	**No**	**N/A**
6.	**Solvent management/TTO control?**	**X Yes**	**No**	**N/A**
7.	**Suitable sampling location?**	**X Yes**	**No**	**N/A**
8.	**Appropriate self-monitoring procedures/equipment?**	**X Yes**	**No**	**N/A**
9.	**Adequate spill prevention?**	**X Yes**	**No**	**N/A**
10.	**Industry familiar with limits and requirements?**	**X Yes**	**No**	**N/A**

Additional Comments:

Visit Conducted By: Erica McAdoo

Date of Report: 3/8/2017

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Truck-O-Mat

Industry Contacts: Bruce Henson, Owner

Type of Industry: Truck wash

Date of Visit: 3/8/2017

1.	**Significant industrial user:**	**X Yes**	**No**	**N/A**
2.	**Pretreatment equipment or procedures?**	**X Yes**	**No**	**N/A**
3.	**Pretreatment equipment maintained and operational?**	**X Yes**	**No**	**N/A**
4.	**Hazardous waste generated or stored?**	**X Yes**	**No**	**N/A**
5.	**Proper solid waste disposal?**	**X Yes**	**No**	**N/A**
6.	**Solvent management/TTO control?**	**X Yes**	**No**	**N/A**
7.	**Suitable sampling location?**	**X Yes**	**No**	**N/A**
8.	**Appropriate self-monitoring procedures/equipment?**	**X Yes**	**No**	**N/A**
9.	**Adequate spill prevention?**	**X Yes**	**No**	**N/A**
10.	**Industry familiar with limits and requirements?**	**X Yes**	**No**	**N/A**

Additional Comments: Chemicals are used in the process of truck washing

Visit Conducted By: Erica McAdoo

Date of Report: 3/8/2017

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: L'oreal USA

Industry Contacts: Rachael Furnam, Env. Mgr.

Type of Industry: Facility manufactures different cosmetic type products such as mascara, lip gloss, face/body powders, foundations and make-up remover. Areas for powdered products formulation generate no wastewater

Date of Visit: 3/8/2017

1.	**Significant industrial user:**	**X Yes**	**No**	**N/A**
2.	**Pretreatment equipment or procedures?**	**X Yes**	**No**	**N/A**
3.	**Pretreatment equipment maintained and operational?**	**X Yes**	**No**	**N/A**
4.	**Hazardous waste generated or stored?**	**X Yes**	**No**	**N/A**
5.	**Proper solid waste disposal?**	**X Yes**	**No**	**N/A**
6.	**Solvent management/TTO control?**	**X Yes**	**No**	**N/A**
7.	**Suitable sampling location?**	**X Yes**	**No**	**N/A**
8.	**Appropriate self-monitoring procedures/equipment?**	**X Yes**	**No**	**N/A**
9.	**Adequate spill prevention?**	**X Yes**	**No**	**N/A**
10.	**Industry familiar with limits and requirements?**	**X Yes**	**No**	**N/A**

Additional Comments: Facility's wastewater consists of wash down wastewater from the mixing tanks/blending vessels for mascaras.

Visit Conducted By: Erica McAdoo

Date of Report: 3/8/2017

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: **North Little Rock Waste Water Utility-Faulkner Lake Road**

AFIN Number: **60-00274**

NPDES Permit Number(s): **AR0020303**

Program Tracked under NPDES Permit Number: **AR0020303**

Fact Sheet Preparation Date:

Date of Last PCI/Audit: **Last audited on January 20, 2016; Allen Gilliam**

Date of Last Annual Report: **January 2016**

Name of Inspector: **This PCI: Erica McAdoo**

Date PCI Performed: **3/8/2017**

Name, Title, and Telephone Number of Facility Representative: **Ed Toland, Pretreatment Coordinator 501-945-7186**

Name and Title of Other Participants: **Keith Waters, ADEQ**

Number of IUs Visited: **3**

Name(s) of IUs Visited: **Koppers, Blue Beacon, and Loreal**

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.

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. **Kimberly, CINTAS, Molex**

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? **Chamber of Commerce, Water Department Building business inspections on all new businesses.**

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) **14**

6. Number of Categorical Industrial Users: **3**

7. How does the POTW determine the appropriate categorical standards to apply to an IU? **40 CFR and EPA Pretreatment Categories and Standards**

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:Noncatagorical	Regulated Process:
Koppers	**40 CFR 129**	**Wood Preserving**
Caterpillar,Inc.	**40 CFR 433**	**Phosphatizing, metal finishing**

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? **Yes**

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 Permit:	Program:	Comments:
Metals:				
Influent:	**1/QTR**	**1/QTR**	**1/QTR**	
Effluent:	**1/QTR**	**1/QTR**	**1/QTR**	
Sludge:	**1/QTR**		**1/QTR**	
Organics:				
Influent:	**1/Yr**	**1/Yr**	**1/Yr**	
Effluent:	**1/Yr**	**1/Yr**	**1/Yr**	
Sludge:	**1/Yr**	**1/Yr**	**1/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?
No

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? **Yes, permit**

2. How many IU permits (or other control documents) have been issued? **14**

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: **U**
Type of sample: **U**
Monitoring frequency: **U**
Bypass prohibition: **U**
Right of entry: **U**
Nontransferability: **U**
Revocation clause: **U**
Penalty Provisions: **U**
Slug load notification: **U**
Notification of process change: **U**

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	**2/month**	**2/month**
other SIUs	**2/month**	**2/month**
Inspection:		
categorical IUs	**1/year**	**1/year**
other SIUs	**1/year**	**1/year**

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: **Very Good**

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 – IUs are sampled at 2 a month for those expected to be present in the discharge, once a year for the rest

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? **Documents received by administration personnel, date stamped, and electronically scanned for filing**

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? **Yes**
Yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?
Yes – IUs are sampled at 2 a month for those expected to be present in the discharge, once a year for the rest

17. What are the POTW's procedures for following up violations? **Enforcement response plan is followed.**

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: **None located in 2016 report**

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:

Other environmental permits held:

Description of operations:

Process flow diagrams:

Flow measurements:

Measurements of regulated pollutants:

Certification of compliance by the IU:

Compliance schedule (if needed):

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? **None located in 2016 report.**

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

   Effluent limitations: **warning letter to AO**

   Late reports: **same, monetary fine after 30 days late**

   Unpermitted discharges: **Fines**

   Slug loads or spills: **warning letter to AO**

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:

5. Comments on the POTW's enforcement procedures:
N/A

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:
yes – St. Vincent's Hospital in Sherwood.

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? **Yes**

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? **No**

5. Comments on multijurisdictional issues: **None**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Koppers**

POTW Name: **North Little Rock Waste Water Utility- Faulkner Lake Road**

Industry Contacts: **Dusty McDaniel**

Date and Time of Visit: **3/8/2017 10:06**

Description of Manufacturing Process:
Dusty McDaniel

Sources of Process Wastewater:
Railroad tie preservation

Categorical Industry? **yes**

Basis for Limits: **EPA effluent guideline**

Point of Application:

Description of Pretreatment Equipment and Procedures:

Spill Prevention and Solvent Management Procedures:
Located in Section 3.4 of the SWPPP

Sampling Location and Equipment:
Located in Section 6 of the SWPPP

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Truck-O_Mat**

POTW Name: **North Little Rock Waste Water Utility- Faulkner Lake Road**

Industry Contacts: **Bruce Henson, Owner**

Date and Time of Visit: **3/8/2017 11:33**

Description of Manufacturing Process:
Facility uses citric acid as a brightener in the cleaning process. The pH is adjusted prior to sending the city WWTF. Facility also has automated sprayer nozzles. As the truck drives through nozzles are activated, or hand held wands spray either the detergent (caustic), citric acid for final rinse. The final rinse water is sent through activated carbon and a cotton filter before it's used. Workers also use soft brushes between stages to better clean the entire truck. Facility has a pumper truck coming in twice per month to clean the bay's collection pits . There's 4 of them in series separated by baffles to help settling before gravity draining to the main underground pit outside. They use a degreaser [Dipropylene glycol monomethyl ether (DPM)] to clean their own bay.

Sources of Process Wastewater:
Chemicals used in the process of truck washing
Oil and water separator

Categorical Industry? **N/A**

Basis for Limits: **EPA effluent guideline**

Point of Application:

Description of Pretreatment Equipment and Procedures:
pH adjustment and O&G separator
Grit removal system

Spill Prevention and Solvent Management Procedures:
Located in SWPPP

Sampling Location and Equipment:
Automated sampling device

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **L'oreal USA**

POTW Name: **North Little Rock Waste Water Utility- Faulkner Lake Road**

Industry Contacts: **Rachael Furnam, Env. Mgr.**

Date and Time of Visit: **3/8/2017 11:01am**

Description of Manufacturing Process:
Facility manufactures different cosmetic type products such as mascara, lip gloss, face/body powders, foundations and make-up remover. Areas for powdered products formulation generate no wastewater

Sources of Process Wastewater:
Facility's wastewater consists of wash down wastewater from the mixing tanks/blending vessels for mascaras.
These enclosed vessels are filled up with hot water, surfactants/soaps (pH -14 s.u.), "homogenized" w/blenders and drained. The facility has washrooms where removable pieces of equipment are also cleaned, such as valves, hoses and drum pumps.
The mixing containers for powdered products are not washed with Water, rather everything is just brushed down. Pretreatment is conducted in a separate building . All "process" wastewater gravity flows to lift station then pumped into an outside 30,000 gallon equalization tank. From there the waste water is treated in a batch process. Wastewater is flowed through four bag filters in series and pH adjusted using carbon dioxide, then treated with floc and polymer before going through a 6' circular dissolved air flotation (DAF - Krofta brand "SupraCell 6") w/a rotating skimmer to further remove oils, greases and suspended solids. Sludge that is produced by the DAF is held in sludge tanks until it is processed using a rotary vacuum drum filter and Pearlite, a filter aid. The effluent from the DAF is held in a holding tank while it is tested for COD before being released. Effluent is sampled at a station outside the plant after the waste water is released from the holding tanks. Nail enamel packaging is done is a separate building with no waste water

generated and no floor drains.
IU and City reps very familiar with Pretreatment requirements, plant processes and treatment.

Categorical Industry? **N/A**

Basis for Limits: **EPA effluent guideline**

Point of Application:

Description of Pretreatment Equipment and Procedures:

Spill Prevention and Solvent Management Procedures:

Sampling Location and Equipment:
Waste water is sent to a holding tank where COD is measured.