

# ADEQ

ARKANSAS  
Department of Environmental Quality

October 16, 2019

Mr. Greg Ramon, CEO  
Little Rock Water Reclamation Authority  
11 Clearwater Drive  
Little Rock, AR 72204

RE: LRWRA Inspection  
AFIN: 60-00409 Permit No.: AR0021806

Dear Mr. Ramon:

On September 16 and 17, 2019, 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 noted at the time of the inspection. Please refer to the attached inspection report for any comments. If I can be of any assistance, please contact me at [Bolenbaugh@adeq.state.ar.us](mailto:Bolenbaugh@adeq.state.ar.us) or 501-682-0659.

Sincerely,




Jason Bolenbaugh  
Compliance Branch Manager  
Office of Water Quality

CC: Ms. Jamie Ewing, Director of Environmental Assessment, [Jamie.ewing@lrwra.com](mailto:Jamie.ewing@lrwra.com)

 <b>A R K A N S A S</b> Department of Environmental Quality	<b>WATER DIVISION INSPECTION REPORT</b>				
	AFIN: 60-00409	PERMIT #: AR0021806	DATE: 9/16/2019		
	COUNTY: 60 Pulaski	PDS #: 109697	MEDIA: WN		
	GPS LAT:	LONG:	LOCATION: *****		
<b>FACILITY INFORMATION</b>		<b>INSPECTION INFORMATION</b>			
NAME: <b>LRWRA</b> LOCATION: <b>11 Clearwater Drive</b> CITY: <b>Little Rock</b>		FACILITY TYPE: <b>1 - Municipal</b> INSPECTOR ID#: <b>83321 S - State</b> FACILITY EVALUATION RATING: <b>5 - Satisfactory</b> INSPECTION TYPE: <b>Pretreatment Compliance</b>			
<b>RESPONSIBLE OFFICIAL</b>		DATE(S): <b>9/16/2019</b> ENTRY TIME: <b>09:00</b> EXIT TIME: <b>12:00</b> PERMIT EFFECTIVE DATE: <b>1/1/2018</b> <b>9/17/2019</b> <b>08:30</b> <b>12:00</b> PERMIT EXPIRATION DATE: <b>12/31/2022</b>			
NAME / TITLE: <b>Mr. Greg Ramon / CEO</b> COMPANY: <b>Little Rock Water Reclamation Authority</b> MAILING ADDRESS: <b>11 Clearwater Drive</b> CITY, STATE, ZIP: <b>Little Rock AR 72204</b> PHONE & EXT: / FAX: <b>501-688-1404 /</b> EMAIL: <b>gramon@lrwra.com</b>		<b>INSPECTION PARTICIPANTS</b>			
CONTACTED DURING INSPECTION: <b>No</b>		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Jamie Ewing, Dir. of Env. Assessment, LRWRA</b> <b>Cornelius Jones, Pretreatment Specialist, LRWRA</b> <b>Megan Jones, Pretreatment Administrator, LRWRA</b> <b>Drew Waters, Inspector, DEQ</b> <b>Blain Sanders, Inspector, DEQ</b>			
<b>AREA EVALUATIONS</b> <small>(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)</small>					
<b>S</b>	PERMIT	<b>N</b>	FLOW MEASUREMENT	<b>N</b>	STORMWATER
<b>S</b>	RECORDS/REPORTS	<b>S</b>	LABORATORY	<b>N</b>	FACILITY SITE REVIEW
<b>S</b>	OPERATION & MAINTENANCE	<b>N</b>	EFFLUENT/RECEIVING WATER	<b>S</b>	SELF-MONITORING PROGRAM
<b>S</b>	SAMPLING	<b>S</b>	SLUDGE HANDLING/DISPOSAL	<b>S</b>	PRETREATMENT
<b>**</b>	OTHER:				
<b>SUMMARY OF FINDINGS</b>					
<ul style="list-style-type: none"> <li>The Little Rock Water Reclamation Authority (LRWRA) Pretreatment Program was audited by the Division of Environmental Quality (DEQ) in June, 2018. Adam Yates, DEQ Pretreatment Coordinator, explained the LRWRA was in compliance with all applicable pretreatment regulations and were very thorough when conducting surveys, writing permits, sampling, and inspections. During my inspection I found no violations of any pretreatment requirements and the LRWRA maintains excellent records that were readily available for review. All pretreatment staff is knowledgeable of the many industrial users they have within their jurisdiction as well as outside of their jurisdiction, and work well with the operations staff at Fourche Creek Water Reclamation Facility (WRF) and Adams Field WRF. For example, Little Rock Quick Rice (LRQR) is an industrial user that discharges process wastewater from rice cooking processes directly to an equalization basin at Fourche Creek WRF. However, during the inspection it was revealed LRQR had a pump failure which caused all process wastewater to be routed to the headworks of the WRF rather than the EQ basin. The discharge occurred for three days and was not reported by LRQR but was detected by staff at the WRF. Please see the Industrial User Site Visit Form below as well as the separate inspection report for Little Rock Quick Rice.</li> <li>The DEQ appreciates the many records that were forwarded for review, produced during the inspection, and the many copies that were made upon request.</li> </ul>					

**GENERAL COMMENTS**

- The Little Rock Water Reclamation Authority pretreatment program is tracked under NPDES Numbers AR0021806 (Adams Field WRF), AR0040177 (Fourche Creek WRF), and AR0050849 (Little Maumelle WRF). The last pretreatment compliance inspection of the program was conducted on September 10, 2014. The majority of the industrial users discharge to the Fourche Creek WRF and none discharge to the Little Maumelle WRF.
- The pretreatment program currently has 46 permitted Industrial Users. Of those there are 29 Significant Industrial Users (SIUs) and of the SIUs, there are 12 Categorical Industrial Users. All Industrial User permits are current and active with exception of Baptist Health Laundry which closed the week prior to the inspection. A permit closure letter has not been sent and the facility will be reported on the 2019 annual report.
- The IU Survey is submitted to each facility or submitted by each facility during the permit renewal process.
- Each SIU has been inspected annually. In 2018, seven SIUs were inspected more than one time. Little Rock Quick Rice was inspected on nine occasions. Additional inspections may occur when the facility has had violations of permit effluent limitations, or LRWRA suspects a discharge not consistent with pretreatment standards. Additional sampling is required when an effluent violation occurs. LRWRA will conduct additional sampling until no violations of the pollutant occur for two concurrent samples.
- Each SIU have been sampled according to pretreatment protocols. Sampling frequency may vary based on the IU's flow rate or strength of the pollutant being discharged to LRWRA. Many facilities are permitted but do not discharge process wastewater to LRWRA. For example, Cameron Valve and Measurement collects all process wastewater and contracts haulers to properly dispose of it rather than pretreat the wastewater and discharge it to LRWRA.

INSPECTOR'S SIGNATURE:	←Click text to left to add signature	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE:			DATE: 10/3/2019
		Jason Bolenbaugh	

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

Name of Municipality: <b>Little Rock Water Reclamation Authority</b>
AFIN Numbers: <b>60-00409 (Adams Field), 60-01021 (Fourche Creek), and 60-04200 (Little Maumelle)</b>
NPDES Permit Number(s): <b>AR0021806, AR0021806C, ARR00A001 (Adams Field); AR0040177, AR0040177C, ARR001276 (Fourche Creek); and, AR0050849, AR0050849C, and ARR000873(Little Maumelle)</b>
Program Tracked under NPDES Permit Number: <b>AR0021806, AR0040177, and AR0050849</b>
Fact Sheet Preparation Date: <b>November 1, 2017</b>
Date of Last PCI/Audit: <b>September 10, 2014 (PCI) and June 4-6, 2018 (Audit)</b>
Date of Last Annual Report: <b>March 27, 2019 (2018 Annual Report)</b>
Name of Inspector: <b>Jason Bolenbaugh, OWQ Compliance Branch Manager, DEQ</b>
Date PCI Performed: <b>September 16-17, 2019</b>
Name, Title, and Telephone Number of Facility Representative: <b>Jamie Ewing, Dir. Of Environmental Assessment, 501-688-1486</b>
Name and Title of Other Participants: <b>Cornelius Jones, Pretreatment Compliance Specialist, LRWRA Megan Jones, Pretreatment Program Administrator, LRWRA Drew Waters, OWQ Field Inspector, DEQ Blain Sanders, OWQ Field Inspector, DEQ</b>
Number of IUs Visited: <b>2</b>
Name(s) of IUs Visited: <b>Cameron Valve &amp; Measurement, 7200 I-30, Little Rock, 72119 Little Rock Quick Rice, LLC., 5901 Sloane Dr., Little Rock, 72206</b>

**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. **ITW Global Tire Repair was closed because it ceased the categorical process, slime tire repair, and does not discharge any other process wastewater. An updated IU list was provided by the facility in which there are currently 44 permitted IUs.**

2. Has ADEQ or EPA been notified of these changes? **Yes, the annual report documents the removal of ITW Global Tire Repair.**

3. *HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?* **Yes, the renewal application is used as the IU Survey for all permitted facilities.**

4. What procedures are being used to update the IU Survey? **LRWRA uses the renewal application, site inspections, and facility reporting information to make any necessary updates.**

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): **There are 29 SIUs in the pretreatment program consisting of 12 Categorical IUs and 17 Non-Categorical IUs. The SIUs are identified in the 2018 Annual Pretreatment Program Report submitted by the permittee on March 27, 2019. The report can be found on the DEQ website.**

6. Number of Categorical Industrial Users: **12**

7. How does the POTW determine the appropriate categorical standards to apply to an IU? **LRWRA utilized the permit application and on-site inspections to determine the appropriate categorical standards to use.**

8. List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such as Metal Finishing). Additional listings can be made in the comments section if necessary.

Name of IU:	Category:
<b>Arkansas Painting and Specialties</b>	<b>Metal Finishing/40 CFR 433</b>
<b>Cameron Valve &amp; M</b>	<b>Metal Finishing/40 CFR 433</b>
<b>Central Flying Services, Little Rock</b>	<b>Metal Finishing/40 CFR 433</b>
<b>CertainTeed Corporation</b>	<b>Metal Finishing/40 CFR 433</b>
<b>Dassault Falcon Jet</b>	<b>Metal Finishing/40 CFR 433</b>
<b>Hillcrest Camshaft Service Inc.</b>	<b>Metal Finishing/40 CFR 433</b>
<b>Interstate Highway Sign</b>	<b>Metal Finishing/40 CFR 433</b>
<b>PPG Industries</b>	<b>Paint Formulating/40 CFR 446</b>

<b>Rhein Chemie Little Rock</b>	<b>Rubber Manufacturing/40 CFR 428</b>
<b>St. Vincent Hospital</b>	<b>Pharmaceutical Manufacturing /40 CFR 439</b>
<b>Welspun Tubular</b>	<b>Metal Finishing/40 CFR 433</b>
<b>Welspun Tubular HFW</b>	<b>Metal Finishing/40 CFR 433</b>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? **Yes, Local Limits are applied to all non-categorical IUs. In addition to federal standards, local limits may also be applied to categorical IUs if necessary.**

2. Describe any apparent problems with the local limits. **LRWRA is not experiencing any problems with the local limits. The local limits are typically conservative.**

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 II, Condition 9 of the NPDES Permit? **See 40 CFR 122 Table III (Metals) and Table II (Organics).**

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<b>Quarterly</b>	<b>Quarterly</b>	<b>Quarterly</b>	
Effluent:	<b>Quarterly</b>	<b>Quarterly</b>	<b>Quarterly</b>	
Sludge:	<b>Annually</b>			
Organics:				
Influent:	<b>Annually</b>	<b>Annually</b>	<b>Annually</b>	
Effluent:	<b>Annually</b>	<b>Annually</b>	<b>Annually</b>	
Sludge:	<b>Annually</b>			

4. Have there been any inhibitions or upsets at the POTW (since the last PCI or Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the permittee to ensure that the incident would not recur. Were these actions effective? **There have not been any upsets at either treatment plants that received pretreated wastewater from an IU, however the morning of the inspection it was found Little Rock Quick Rice experienced a pump failure that was not reported to LRWRA. The pump failure caused process wastewater to be routed to the LRWRA collection system and thence to the headworks of the plant rather than the designed equalization basin.**

<b>C. INDUSTRIAL USER CONTROL MECHANISM</b>	
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? <b>Yes, all IUs are issued a permit by LRWRA. For IUs that are outside of the jurisdiction but discharge to LRWRA, the facilities are issued an agreement unless it is determined a permit is required. At this time there are no IUs outside of the jurisdiction that require a permit.</b>	
2. How many IU permits (or other control documents) have been issued? <b>44 permits have been issued.</b>	
3. <i>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.</i> <b>Yes, according to LRWRA all permits are active but Baptist Health Laundry was closed recently and a permit closure letter will soon be sent to the facility.</b>	
4. Does the control document contain the following items? <b>A review of Cameron Valve &amp; Measurement's permit was conducted to determine if all requirements were included.</b>	
	An expiration date: <b>September 30, 2019</b>
	Discharge limitations: <b>Part I, Permit Requirements</b>
If the program requires self-monitoring by the IUs, do the permits contain:	
	IU self-monitoring requirements: <b>LRWRA conducts all effluent sampling, including self-monitoring requirements, for all IUs. The sampling cost is built into the permit fee. If additional sampling is required due to effluent violations LRWRA will surcharge the facility accordingly.</b>
	IU reporting requirements: <b>Part II, Section D.4</b>
5. Indicate which of the following recommended standard conditions are contained in the control documents:	
	Sample location: <b>Manhole 021</b>
	Type of sample: <b>Grab and Composites (Part I)</b>
	Monitoring frequency: <b>2/year and 1/6 months (Part I)</b>
	Bypass prohibition: <b>Part II, Condition B</b>
	Right of entry: <b>Part III, Condition B</b>
	Nontransferability: <b>Part III, Condition F</b>
	Revocation clause: <b>Part III, Condition H</b>
	Penalty Provisions: <b>Part III, Condition I</b>
	Slug load notification: <b>Part II, Condition D.1</b>
	Notification of process change: <b>Part II, Condition D.3</b>



D. MONITORING OF IUS BY POTW			
1. Indicate current inspection and sampling frequency and program requirement below.			
		<u>Current frequency:</u>	<u>Program Requirement:</u>
Sampling:			
Categorical IUs		<b>Monthly to Semi-Annually</b>	<b>Annually</b>
Other SIUs		<b>At least Annually</b>	<b>Annually</b>
Non-SIUs		<b>Annually</b>	
Inspection:			
Categorical IUs		<b>Annually</b>	<b>Annually</b>
Other SIUs		<b>Annually</b>	<b>Annually</b>
Non-SIUs		<b>Annually</b>	
2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? <b>Yes, all SIUs were sampled and inspected at least annually. Seven facilities were inspected more than once during the 2018 calendar year. Additional inspections may be conducted following an effluent violation or other violation, or as a follow-up when the facility experiences changes in responsible officials. Additional sampling may also occur when a facility experiences effluent violations but also when a batch discharge is occurring. Facilities will continue to be sampled during every discharge following an effluent violation until such time as they have had two consecutive discharges without a violation.</b>			
3. Are inspections announced or unannounced? <b>Both</b>			
4. Are records kept of each inspection? <b>Yes</b>			
5. Does the inspection report contain an adequate description of the following: <b>A review of the Welspun Tubular HFW, LLC inspection was conducted to determine if all requirements were included in the inspection.</b>			
Date and time of inspection: <b>Yes</b>			
Officials present: <b>Yes</b>			
Inspection of chemical storage areas: <b>Yes</b>			
Description of regulated processes, categorical waste streams, and discharge location of these waste streams: <b>Yes</b>			
Inspection of the pretreatment facilities: <b>Yes</b>			
Review of self-monitoring records: <b>Yes</b>			
Observation of IU self-monitoring procedures: <b>N/A, LRWRA conducts all self-monitoring sampling.</b>			

Verification that approved analytical techniques are used: <b>LRWRA is using approved analytical techniques.</b>
Verification of IU flow measurement (where required): <b>Not evaluated.</b>
6. Overall adequacy of inspection documentation: <b>Inspection is adequate and details facility processes and pretreatment units when applicable.</b>
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)? <b>Yes, LRWRA samples all IUs at least annually for all pollutants regulated in their permits.</b>
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? <b>Yes</b>
9. Are sampling and flow monitoring equipment properly maintained? <b>N/A, no sampling or flow monitoring equipment was inspected at this time.</b>
10. Is the POTW keeping proper field notes and chain of custody forms? <b>Yes, LRWRA maintains meticulous field notes and sampling documentation.</b>
11. Is the sampling location representative of the discharge to the collection system? <b>Yes</b>
12. Are sampling locations identified in POTW records? <b>Yes</b>
13. Are sampling services available in an emergency? <b>Yes</b>
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? <b>The annual report contains a summary of when BMRs, 90-day compliance reports, semi-annual reports, and self-monitoring reports were due and when they were received. LRWRA will utilize a spreadsheet and joint calendars to track the receipt of documentation.</b>
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? <b>Yes</b>
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? <b>LRWRA uses an approved ordinance and Enforcement Response Plan to address all violations by an IU.</b>
17. What are the POTW's procedures for following up violations? <b>Sampling events will continue to occur until the facility has reached compliance during two consecutive sampling events. Other violations</b>

of the permit such as non-reporting will be followed-up by a phone call, email, or site inspection.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?  
Yes, but the most recent BMR that needed to be submitted to LRWRA was Welspun Tubular HFW in January 2013.

19. Additional comments on the POTW's inspection and sampling procedures: The inspections are being conducted as required and include all of the necessary facility information and photo documentation so the reader can understand the plant operations and pretreatment requirements. The sampling information is very thorough and the staff maintains detailed records that allow for easy evaluation of data.

E. Enforcement	
1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? <b>Yes, LRWRA has an ordinance that effectively addresses procedures that can be taken to address and noncompliance incident. Procedures may begin with an informal action by LRWRA such as a phone call or email, but more significant measures can be taken such as discharge permit termination, civil penalties, and criminal prosecution.</b>	
2. How does the POTW respond to the following violations?	
	Effluent limitations: <b>24-hr notification by the IU to LRWRA, resampling, corrective action report to LRWRA, Notice of Violation, more severe enforcement action if necessary.</b>
	Late reports: <b>Informal enforcement action such as a telephone call or email notifying the IU of the delinquency, letter, NOV, and more severe enforcement action if necessary.</b>
	Unpermitted discharges: <b>Immediate notification to the facility, NOV or more severe enforcement as outlined in Section 10 of the ordinance, civil penalties, elimination of discharge until such time as a permit decision has been made by LRWRA.</b>
	Slug loads or spills: <b>Immediate notification to the facility if unreported, NOV or more severe enforcement as outlined in Section 10 of the ordinance, civil penalties.</b>
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)? <b>Yes, per the program's ordinance the CEO shall publish annually, in a newspaper of general circulation that provides meaningful public notice within the jurisdictions served by the POTW, a list of the IUs which, during the previous twelve months, were in significant noncompliance with applicable pretreatment standards and requirements. The 2018 report documented Little Rock Quick Rice was in SNC and it contains a copy of the newspaper article.</b>	

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:
<b>Little Rock Quick Rice</b>	<b>pH Effluent Limitation</b>	<b>Notice of Violation</b>	<b>2 consecutive sampling events</b>

5. Comments on the POTW's enforcement procedures: **LRWRA's ordinance clearly outlines potential actions that may be taken by the authority when violations of the permit occur by the IU. LRWRA will adjust the severity of their enforcement actions based on the type, frequency, or severity of the violation committed by the IU. In addition to potential enforcement actions outlined in the ordinance, LRWRA will publish in a newspaper a list of the IUs which were in Significant Non-Compliance with pretreatment standards.**

<b>F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE</b>
<p>1. Is the program structure essentially the same as that presented in the approved pretreatment program?  <b>Program structure consist of the following:</b></p> <ul style="list-style-type: none"> <li>• <b>Jamie Ewing, Environmental Assessment Department Director</b></li> <li>• <b>Megan Jones, Pretreatment Program Administrator</b></li> <li>• <b>Cornelius Jones, Pretreatment Compliance Specialist</b></li> <li>• <b>Mikel Murders, Environmental Sampling Administrator</b></li> <li>• <b>Rebecca Burkman, Laboratory Administrator</b></li> </ul>
<p>2. Are staffing levels adequate? <b>In addition to the above referenced individuals, there are also 4 laboratory technicians under Mr. Murders' supervision. Even with a decline in pretreatment staff compared to recent years the current staff continue to meet requirements.</b></p>
<p>3. Are the responsible officials familiar with the approved program?  <b>Yes</b></p>
<b>G. MULTIJURISDICTIONAL ISSUES</b>
<p>1. List any IUs which are located outside of the jurisdictional area of the POTW: <b>8 IUs have been surveyed in 2019. One inspection of Liquid Concepts in Alexander, Arkansas, was conducted during this time.</b></p>
<p>2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? <b>Yes, agreements will be made between LRWRA and the IUs if the IU does not require a permit.</b></p>
<p>3. Does the POTW have copies of permits for IUs in other cities? <b>No IU outside of LRWRA jurisdiction has required a permit.</b></p>
<p>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? <b>No</b></p>
<p>5. Comments on multijurisdictional issues: <b>LRWRA staff will revisit the IUs in 3-5 years to update the IU survey and determine any permit requirements.</b></p>

PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM

Name of Industry: <b>Cameron Valve &amp; Measurement</b>
POTW Name: <b>Little Rock Water Reclamation Authority</b>
Industry Contacts: <b>Mr. Kevin Eads, HSE Manager</b>
Date and Time of Visit: <b>September 17 @ 9:00 AM</b>
Description of Manufacturing Process: <b>Cameron V&amp;M produces specialized valves for the oil and gas, wastewater, medical, and chemical industries. Industrial processes consist of vibratory finishing, phosphate coating, machining, washing, painting, and more.</b>
Sources of Process Wastewater: <b>Vibratory finishing, phosphate coating, paint booth, hydro-pressure testing, and the chip shed all produce wastewater that is either recirculated or is disposed of in the two 2500 gallon storage tanks for off-site disposal.</b>
Categorical Industry? <b>Yes</b>
Basis for Limits: <b>40 CFR 433</b>
Point of Application: <b>All process wastewater is not discharged to the LRWRA wastewater treatment facility. Rather, it is hauled away by Heritage Crystal Clean. Outfall 01 receives approved non-contact cooling wastewater discharge from the facility and is the compliance monitoring sample point for LRWRA.</b>
Description of Pretreatment Equipment and Procedures: <b>The facility does not discharge process wastewater to LRWRA. All process wastewater is recirculated or sent to holding tanks to be disposed of off-site by Heritage Crystal Clean. There are two, 2500 gallon holding tanks maintained outside under cover and within secondary containment.</b>
Spill Prevention and Solvent Management Procedures: <b>The facility maintains their holding tanks and other fluids and fluid storage containers within secondary containment or on secondary containment structures. The facility has a spill response team and many spill response kits located throughout the facility.</b>
Sampling Location and Equipment: <b>The sampling location was adequate and allows for LRWRA to set up the composite sampler at Outfall 01.</b>

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: <b>Little Rock Quick Rice, LLC.</b>
POTW Name: <b>Little Rock Water Reclamation Authority</b>
Industry Contacts: <b>Mr. Joshua Nix - Maintenance Supervisor</b>
Date and Time of Visit: <b>September 17 @ 10:30</b>
Description of Manufacturing Process: <b>Facility is a rice processing facility engaged in rice cooking and drying for instant rice and rice cooking and flash freezing.</b>
Sources of Process Wastewater: <b>Outfall 01 consists of wastewater discharge from rice cooking processes only. Outfall 02 consists of wastewater from sanitizing process equipment.</b>
Categorical Industry? <b>No, but is Significant IU</b>
Basis for Limits: <b>Local Limits</b>
Point of Application: <b>Outfall 01 process wastewater is designed to discharge to the Process Wastewater Lift Station into a high strength waste line force main that discharges directly into a basin at the Fourche Creek Water Reclamation Facility. This basin is used only for the process water discharge from LRQR. However, when LRQR discharges directly to the sanitary sewer it is quickly noticeable by LRWRA staff due to pH changes in the influent. Outfall 02 discharge flows directly to the domestic wastewater lift station.</b>
Description of Pretreatment Equipment and Procedures: <b>pH adjustment, centrifuges for flow reduction; EQ basin at Fourche Creek WRF. Currently the system is overwhelmed but the facility is adding a large recirculation tank that will allow for greater recirculation and pH adjustment.</b>
Spill Prevention and Solvent Management Procedures: <b>Fluid containers are maintained above secondary containment structures. The facility has staff that monitors and remediates any spills.</b>
Sampling Location and Equipment: <b>LRQR monitors pH of the process water with digital monitors. LRWRA conducts all sampling of permit limitations.</b>



PPETS CODE SHEET  
 PRETREATMENT COMPLIANCE INSPECTION (PCI)

	CODE
INSPECTOR'S NAME: <b>Jason Bolenbaugh</b>	
NAME OF FACILITY: <b>Little Rock Water Reclamation Authority</b>	
PERMIT NUMBERS USED TO TRACK PROGRAM: <b>AR0021806, AR0040177, and AR0050849</b>	NPID
DATE OF PCI: <b>September 16-17, 2019</b>	DTIA
PPETS WENDB DATA ELEMENTS	
NUMBER OF SIGNIFICANT IUS (SIUS): <b>29</b>	SIUS
NUMBER OF CATEGORICAL IUS: <b>12</b>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW: <b>0</b>	NOIN
SIUS WITHOUT CONTROL MECHANISM: <b>0</b>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING: <b>1 - Little Rock Quick Rice</b>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS: <b>0</b>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY THE POTW: <b>0</b>	SNIN