

October 15, 2020

Mr. Gregorio Ramon, Chief Executive Officer Little Rock Water Reclamation Authority 11 Clearwater Dr. Little Rock, AR 72204

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

Dear Mr. Ramon:

On September 15, 2020, I performed a Compliance Evaluation 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 <u>bolenbaugh@adeq.state.ar.us</u> or 501-682-0659.

Sincerely,

ann Relations

Jason Bolenbaugh Compliance Branch Manager, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

ENVIRONMENTAL		0	FFICE OF W			•		•
	AFIN	N: 60-00409	PERMIT #: AR002180		306		DATE: 9/15/2020	
OF AND ENVIRON	COL	JNTY: 60 Pul	aski	PDS	#: 113	679		MEDIA: WN
	GPS	LAT: 34.735	5314 LONG: -92.21	6435	LOCAT	ION: E	Intranc	e
FACILITY INFORMAT	ION		IN	ISPEC	TION I	INFOR	MATIO	N
NAME: LRWRA Adams Field WRF LOCATION:			FACILITY TYPE: 1 - Municipal					
1001 Temple St.			FACILITY EVALUATION RATIN 4 - Satisfactory	1		Com	ION TYPE: pliance	Evaluation
Little Rock			. ,	NTRY TIME		TIME: :33		FFECTIVE DATE:
RESPONSIBLE OFFIC			9/15/2020 0	0.45	10	.33	1/1/20	D18 XPIRATION DATE:
NAME: / TITLE			_					/2022
Mr. Gregorio Ramon / Chief Executive Officer		FAYETTEVILLE	FAYETTEVILLE SHALE RELATED: N					
Little Rock Water Reclamation Authority		FAYETTEVILLE	FAYETTEVILLE SHALE VIOLATIONS: N					
Mailing address: 11 Clearwater Dr.			INSPECTION PARTICIPANTS					
CITY, STATE, ZIP: Little Rock AR 72204 PHONE & EXT: / FAX: 501-688-1404 / EMAIL: greg.ramon@Irwra.com CONTACTED DURING INSPECTION: No			MAME/TITLE/PHONE/FAX/EM/ Mr. Eric Wasse Mr. Matt Williar LRWRA	ll, Sr.				s Coordinator,
CONTACTED DORING INSPECTION.	NU		VALUATIONS					
		ry, M=Marginal, U=U	nsatisfactory, N=Not Applicable	/Evaluate				
S PERMIT		FLOW MEAS		N		RMWA		
S RECORDS/REPORTS	-	LABORATOR		S	_		SITE RE	
S OPERATION & MAINTENANCE	-			-				IG PROGRAM
S SAMPLING ** OTHER:	3	SLUDGE HAI	NDLING/DISPOSAL	. N	PRE	IREA	FMENT	
OTHER.		SUMMARY						
SUMMARY OF FINDINGS No violations were noted at the time of the inspection. LRWRA is currently upgrading the water reclamation facility as numerous construction projects are ongoing. Facility upgrades have been delayed but are ongoing and likely will not be completed until 2021. As a result the parmittee is unlikely to meet the compliance schedule deadline for final offluent limitations for CROD, and NH.								

permittee is unlikely to meet the compliance schedule deadline for final effluent limitations for CBOD₅ and NH₃-N as required in Part I, Section B of the permit. The permittee has been in continued discussions with the Office of Water Quality Permits Branch regarding this issue. Installation of the peracetic acid disinfection system has been completed.

GENERAL COMMENTS

The existing treatment system is: bar screens, grit removal, primary clarification, complete mix activated sludge, secondary clarification, and UV disinfection with a design flow of 36MGD. UV disinfection will be supplemented with peracetic acid disinfection when UV transmittance is below 65%. The addition of the peracetic acid was the basis for the permit modification that became effective on January 1, 2020.

A review of Discharge Monitoring Reports from January 1, 2018 to present July 30, 2020 was conducted. No effluent limitation violations or Whole Effluent Toxicity (WET) testing failures have been reported during this time. On January 3, 2019, the Office of Water Quality granted the permittees request to reduce the frequency of Whole Effluent Toxicity testing. The facility is currently under a Permit Compliance Schedule (Refer to Part I.B of the permit) to achieve compliance with final effluent limitations for CBOD₅ and NH₃-N by January 1, 2021. The permittee has submitted both annual progress reports and a final report is due within 30 days following the final compliance date.

Sanitary Sewer Overflows (SSO) is being addressed by LRWRA through the 2010 System Evaluation and Capacity Assurance Plan (SECAP). A second amendment to the plan was may on April 18, 2019. A compliance deadline is December 21, 2023.

Inspections of NPDES Permits AR0021806C, AR0021806C1, ARR00A001, and ARR156652 were conducted in coordination with this inspection. Please refer to those inspections for more specifics regarding those permits.

An evaluation of the pretreatment program was not completed during this inspection as a Pretreatment Compliance inspection of LRWRA's Pretreatment Program was completed in September, 2019.

INSPECTOR'S SIGNATURE:	 Click text to left to add signature 	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE:	an Realing	son Bolenbaugh	DATE: 10/15/2020

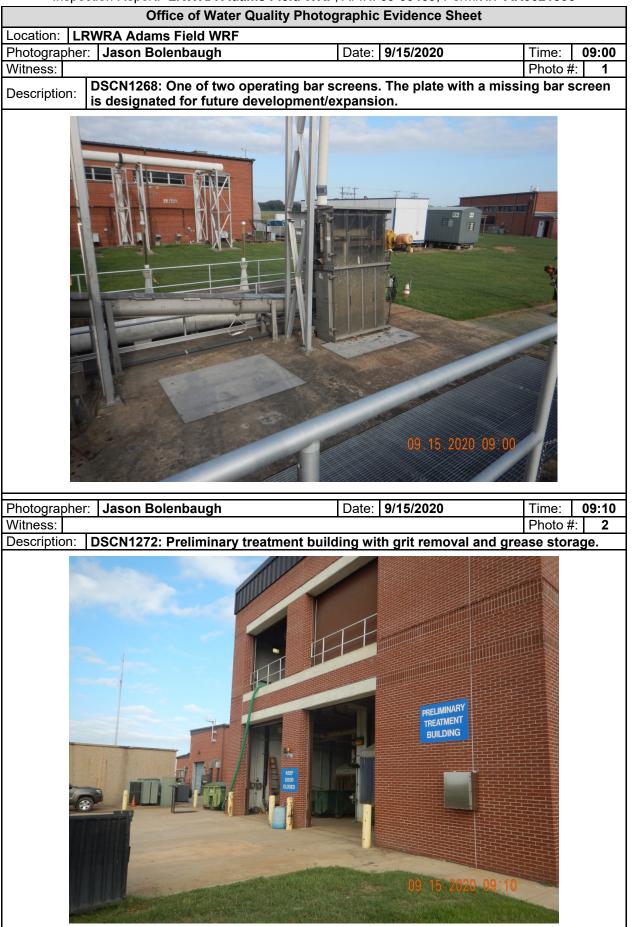
Inspection Report: LRWRA Adams Field WRF, AFIN: 60-00409, Permit #: AF	20021806
SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: Mr. Gregorio Ramon, 11 Clearwater Dr., Little Rock, AR, 72204	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT, OR INCREASED DISCHARGES: 2 active permit modifications	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: Outfall 001 to the Arkansas River	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	🗹 S 🗆 M 🗇 U 🗆 NA 🗆 NE
DETAILS: An onsite visit to the laboratory was not conducted. A review of requested documentation	was completed.
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🖙 🗇 🖓 na 🕬
a. DATES AND TIME(S) OF SAMPLING: March 2, 2020	Øy 🗅n 🗇na 🗇ne
b. EXACT LOCATION(S) OF SAMPLING: Adams Field Final Effluent	Øy 🛛 n 🗆 na 🖾 ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING: RKS set up the sampler	🗹 Y 🗆 N 🗆 NA 🗆 NE
d. ANALYTICAL METHODS AND TECHNIQUES:	🗹 Y 🗆 N 🗆 NA 🗆 NE
e. RESULTS OF CALIBRATIONS: RKS conducted pH calibration	Øy 🛛 n 🗆 na 🗇 ne
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs Om Ou Ona One
2. TREATMENT UNITS PROPERLY MAINTAINED:	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: 2 backup generators totaling 2815 horsepower. However, both	
generators will be replaced with redundant power circuits provided by Entergy. The redundant power circuits will provide backup power to 100% of the plant and to both existing and newly installed treatment components.	Øs 🗆m 🗇u 🗇na 🗇ne
 ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: Facility is on SCADA 	Øs Om Ou Ona One
5. ALL NEEDED TREATMENT UNITS IN SERVICE: All treatment units were in service but may have not been in operation at the	
 time or construction activity was being conducted. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: Mr. John Thompson (Superintendent – Class IV – 007158), 	
Randy Weaver, Steven McGhee, Chase Cope, Luke Baldwin, Erik Morrow, Mark Turpin, Byron Shavers	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: LRWRA provided a reorder report for all three WRFs.	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: Operation logs provided.	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
 HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: From Augu 2019 to July 2020 155 SSOs were reported with an estimated volume spilled of 61,225 gallons. 	IST ØY ON ONA ONE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	Øy 🛛 n 🗆 na 🗆 ne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: See SECAP comments above.	Øy 🛛 n 🗆 na 🗆 ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□y Øn □na □ne
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	⊠S ⊡M ⊡U ⊡NA ⊡NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT: Only one outfall, 001. Influent and effluent automatic samplers.	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT: Influent is a time-composited sample	
 SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT: BOD₅, TSS, NH₃-N, CBOD₅, FCB, TP, N N, PAA, and pH. 	^{O3+NO2-} ØY 🗆 N 🗆 NA 🗆 NE
 SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT: Grabs: FCB, PAA, and pH (2/week), TP (1/month) and NO₃+NO₂-N (1/quarter). See Composite frequencies below. 	
 SAMPLE COLLECTION PROCEDURES ADEQUATE: The laboratory staff is separate from the operations staff and therefore security measures are in place to ensure samples are only accessible by laboratory staff. 	
a. SAMPLES REFRIGERATED DURING COMPOSITING: BOD ₅ and TSS (3/week), and NH ₃ -N and CBOD ₅ (2/week - May – Octob	er) 🗹 Y 🗆 N 🗆 NA 🗆 NE
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	
DETAILS:	
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED? TYPE OF DEVICE: There isn't a prin flow measuring device. Previous inspections and application noted a 4.96' weir with end contractions but calibration tests conducted within the four UV channels.	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE: Flow calibration methods were provided upon request.	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS □M □U □NA □NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED >10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED >10% OF THE TIME:	MY ON ONA ONE
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE: Huther and Associates, Inc. (Denton, TX) performs biomonitoring.	
a. PROPER ORGANISMS USED: Ceriodaphnia dubia & Pimephales promelas	
b. PROPER DILUTION SERIES FOLLOWED: 9%, 12%, 16%, 21% (critical), and 28%	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED: No failures noted during DMR review	

SECTION	EFFLUENT/R	•			- 00409 , Ferrint #.	AI(0021000		
	N VISUAL OBS	-						
DETAILS:	VISUAL ODS	LIVATIONS						
		005405	TUPPIDITY			001.05	OTUER	
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001	No	No	No	No	No	Clear		
	: SLUDGE DIS			50				
	DISPOSAL ME							
	Sludge is thicken Joon storage, and			to LRWRA'S FOU	Irche Creek WRF fo	or anaerobic dige	estion, gas	
	ANAGEMENT ADEQU					⊠s ⊡m		
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40) CFR 503:					
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):			
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES					
SAMPLE F	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ⊠NA ⊡NE	
DETAILS:					ł			
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				ΠY	🗆 n 🗹 na 🗆 ne	
2. TYPE OF S			IETHOD: FREQUE	NCY:				
3. SAMPLES	PRESERVED:					ΠY	□n Øna □ne	
4. FLOW PRC	PORTIONED SAMPLE	S OBTAINED:				ΠY	□n Øna □ne	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						ΠY	🗆n 🗹na 🗆ne	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:								
7. SAMPLE S	PLIT WITH PERMITTE	E:						
8. CHAIN-OF-	8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						□n Øna □ne	
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY	□n Øna □ne	
	: STORM WAT							
	ATER MANAG						U ⊠NA ⊡NE	
-	This facility has a	In IGP No-Exposi	ire exclusion (AR	R000873). Please	e refer to a separat	e inspection repo	ort for that	
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:				On Øna One	
	NCLUDING ALL DISCH							
	N PREVENTION TEAM							
	N PREVENTION TEAM		:					
	DTENTIAL POLLUTAN							
	DTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:					
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:					
8. LIST OF ST	RUCTURAL BMPS:							
9. LIST OF NO	ON-STRUCTURAL BMF	PS:						
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:					🗆 n 🗹 na 🗆 ne	
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				Πr	🗆 n 🗹 na 🗆 ne	

DMR Calculation Check

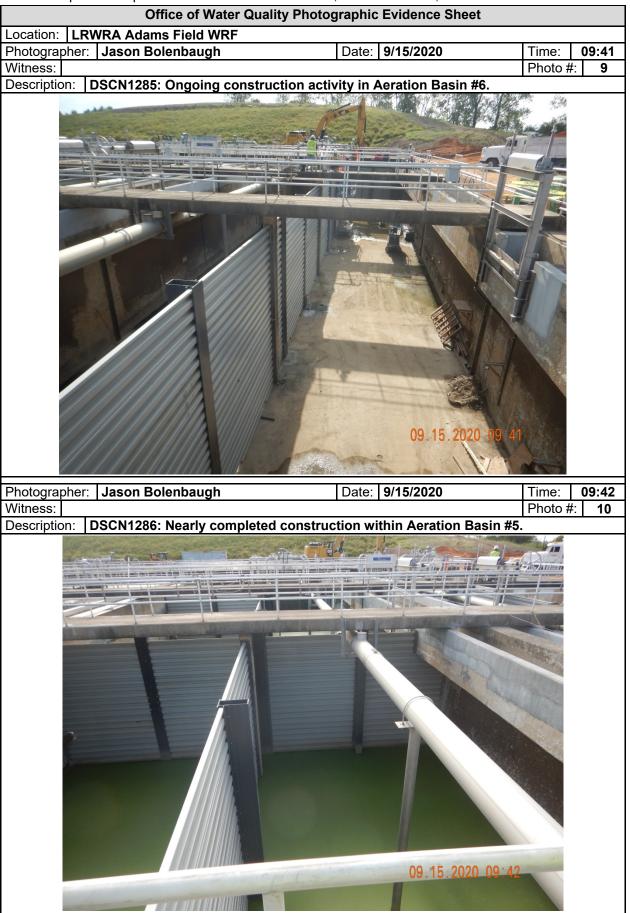
Reporting Period:	From	2020 Year	03 Month	01 Day	_ To	2020 Year	03 Month	31 Day
Parameter Checked:		TSS	-					
		Loading Mass				Concer Mon		
	Mo.	Avg Ibs/c	lay	Mo. A	vg I	ng/l	7-day Avg	J mg/l
Reported Value:	<u> </u>	4167			18.1		27.0	6
Calculated Value:		4167		18.1			27.0	6
Permit Value:		9007			30		45	



	•	notographic Evidence Sheet	
Location:	RWRA Adams Field WRF		
Photographe		Date: 9/15/2020	Time: 09:11
Witness:			Photo #: 3
Description:	DSCN1272: Newly installed pipe the	nat delivers scum to preliminar	y treatment.
Photographo		Date: 9/15/2020	Time: 09:15
Photographe Witness:	er: Jason Bolenbaugh	Date: 9/15/2020	Photo #: 4
Description:	DSCN1275: Primary Clarifier #2 in	operation. It was the only prim	

	Office of Water	Quality Photographic Evidence Sheet	
Location: LR	WRA Adams Field WRF	, , , , , , , , , , , , , , , , , , , ,	
Photographer:		Date: 9/15/2020	Time: 09:27
Witness:		· · ·	Photo #: 5
Description:	DSCN1280: Primary clar	ifier #3 not in use.	
Photographer:	Jason Bolenbaugh	Date: 9/15/2020	Time: 09:19
Photographer: Witness:	Jason Bolenbaugh	Date: 9/15/2020	Time: 09:19
Witness:	Jason Bolenbaugh		Time: 09:19 Photo #: 6
Witness:			

Office of Water Quality Photo	ographic Evidence Sheet	
Location: LRWRA Adams Field WRF		
Photographer: Jason Bolenbaugh	Date: 9/15/2020	Time: 09:25
Witness:		Photo #: 7
Description: DSCN1278: Influent sampler.		
<complex-block></complex-block>		
Photographer: Jason Bolenbaugh Witness:	Date: 9/15/2020	Time: 09:38 Photo #: 8
Description: DSCN1283: Two of three new aeration one is 450 horsepower.	n basin blowers. Two are 350 h	



	Photographic Evidence Sheet	
Location: LRWRA Adams Field WRF		
Photographer: Jason Bolenbaugh	Date: 9/15/2020	Time: 09:46
Witness:		Photo #: 11
Description: DSCN1290: Aeration Basin #1.		
	09 15 2020 0	9.46
Photographer: Jason Bolenbaugh	Date: 9/15/2020	Time: 09:51
Witness: Description: DSCN1291: Discharge from aera	tion basin to the octation	Photo #: 12
	the octagon.	
	Contraction of the second seco	



	Office of Water Quality Ph	otographic Evidence Sheet	
Location: L	RWRA Adams Field WRF	5	
Photographe		Date: 9/15/2020	Time: 10:03
Witness:			Photo #: 15
Description:	DSCN1296: Ongoing construction	with Final Clarifier #1.	· · · · · · · · · · · · · · · · · · ·
		09 15 2020 10	
Photographe	er: Jason Bolenbaugh	Date: 9/15/2020	Time: 10:00
Witness:	DSCN1294: Octagon that receives	activated cludge in the inner of	Photo #: 16
Description:	clarifier effluent in the outer chann	el where the peracetic acid fee	ed is located.



	Quality Photographic Evidence Sheet
Location: LRWRA Adams Field WRF	
Photographer: Jason Bolenbaugh	Date: 9/15/2020 Time: 10:11
Witness:	Photo #: 19
Description: DSCN1301: UV system ov	verview.
Photographer: Jason Bolenbaugh	Date: 9/15/2020 Time: 10:07
Witness:	Photo #: 20
	posite sampler showing an internal temperature of 3°C. ly available to laboratory staff.



Office of Water Quality Photographic Evidence Sheet					
	VRA Adams Field WRF				
Photographer:	Jason Bolenbaugh	Date:	9/15/2020	Time:	10:20
Witness:				Photo #	#: 23
Description:	OSCN1309: Sludge Thickener #2.				