ARKANSAS
ENERGY & ENVIRONMENT

February 11, 2021

Mr. Michael Clayton, Director
North Little Rock Water Utility
P.O. Box 17898
North Little Rock, AR 72117

RE: NLRWU - Pretreatment Inspection
AFIN: 60-00274 Permit No.: AR0020303

Dear Mr. Clayton:

On January 26 and 27, 2021, 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 inspection report for any comments. If I can be of any assistance please contact me at Bolenbaugh@adeq.state.ar.us or 501-682-0659.

Sincerely,

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

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **60-00274**	PERMIT #: **AR0020303**	DATE: **1/26/2021**
COUNTY: **60 Pulaski**	PDS #: **114956**	MEDIA: **WN**
GPS LAT: **34.739073** LONG: **-92.179918** LOCATION: **Entrance**		

FACILITY INFORMATION

NAME:
NLRWU - Pretreatment
LOCATION:
7400 Baucum Pike
CITY:
North Little Rock

RESPONSIBLE OFFICIAL

NAME: / TITLE
Mr. Michael Clayton / Director
COMPANY:
North Little Rock Water Utility
MAILING ADDRESS:
P.O. Box 17898
CITY, STATE, ZIP:
North Little Rock AR 72117
PHONE & EXT: / FAX:
501-945-7186 /
EMAIL:
mclayton@nlrwu.com
CONTACTED DURING INSPECTION: **No**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**
INSPECTOR ID#: **83321 S - State**
FACILITY EVALUATION RATING: **4 - Satisfactory**
INSPECTION TYPE: **Pretreatment Compliance**

DATE(S):	ENTRY TIME:	EXIT TIME:
1/26/2021	09:00	11:50
1/27/2021	09:00	10:15

PERMIT EFFECTIVE DATE: **6/1/2019**
PERMIT EXPIRATION DATE: **5/31/2024**

FAYETTEVILLE SHALE RELATED: **N**
FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Marybeth Eggleston, EC&S Superintendent, NLRWU
Ed Toland, Pretreatment Supervisor, NLRWU
Mitch Foreman, Sr. Industrial Technician, NLRWU

AREA EVALUATIONS

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

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

SUMMARY OF FINDINGS

- **The last PCI was conducted on March 8, 2017. Ben E. Keith, a non-categorical SIU was added to the pretreatment program (hereinafter "Program") in 2018 and Safe Foods, a categorical SIU was added in 2019. No new facilities were added to the program in 2020. Currently there are 19 SIUs in the program.**
- **A review of the November 14, 2019 inspection report at Caterpillar Inc., revealed permit information listed in Part II, Section B (Facility Permits) needs to be revised. Specifically, the permits listed for DEQ Air and Stormwater were incorrect. The active permit numbers for the respective permits are 2209-AR-5 and ARR001186. NPDES Permit AR0051454 was terminated on January 13, 2014. You may find updated permit information using the hyperlink: https://www.adeq.state.ar.us/home/pdssql/p_facil_info.aspx?AFINDash=60-01529&AFIN=6001529. Given all permits have recently renewed NLRWU may want to review all permit information prior to the next SIU permit renewals.**
- **All pretreatment permits are issued on a 4-year term and all expire on the same day. All 19 permits are effective. All permits contain the required information list in Part II, Condition 8.A.iv of the permit.**
- **Program staff visits each SIU on a daily basis during the weekday at which time they measure the pH and temperature of discharge during each visit which accounts for the large number of "Times Sampled" and "Sampling Inspections Made". Sampling of the SIUs effluent is conducted once by the SIU and 1-2 times by NLRWU on a monthly basis. Additional sampling may also be conducted if NLRWU identifies abnormalities with the water quality during their daily visits. NLRWU conducts annual compliance inspections of the entire pretreatment system as required.**
- **The inspection document is very thorough and includes but is not limited to pretreatment system operation and maintenance, flow monitoring, pollution prevention and spill response, slug load prevention, proper waste generation and disposal, and self-monitoring.**

GENERAL COMMENTS	
▪ **On May 15, 2019, the permittee submitted a technical evaluation to the DEQ that determined the current local limits were adequate.** ▪ **The permittee is operating the pretreatment program in accordance with the permit requirements and regulations. The permittee maintains close working relationships with each of the SIUs as witnessed while on site at Cintas Corporation and Molex LLC. Although eight industries were found to be in noncompliance status in 2019 none were in significant noncompliance.** ▪ **The NLRWU pretreatment program staff is very knowledgeable and their assistance with providing a large amount of documentation prior to the inspection was greatly appreciated.**	
INSPECTOR'S SIGNATURE: ←Click text to left to add signature **-Inspector Name**	DATE:
SUPERVISOR'S SIGNATURE:  **Jason Bolenbaugh**	DATE: **2/10/2021**

Name of Municipality: **North Little Rock Water Utility**
AFIN Number: **60-00274, 60-04317, 60-00545, 60-04318**
NPDES Permit Number(s): **AR0020303, AR0020320, AR0033626, AR0038288, ARR000601, ARR000299, ARR000175, ARR000067**
Program Tracked under NPDES Permit Number: **AR0020303**
Fact Sheet Preparation Date: **March 21, 2019 (Public Notice Date)**
Date of Last PCI or Audit: **March 8, 2017 (PCI) and November 17-19, 2015 (Audit)**
Date of Last Annual Report: **March 12, 2019**
Name of Inspector: **Jason Bolenbaugh**
Date PCI Performed: **January 26-27, 2021**
Name and Title of Facility Representative: **Marybeth Eggleston, EC&S Superintendent, NLRWU**
Name and Title of Other Participants: **Ed Toland, Pretreatment Supervisor, NLRWU** **Mitch Foreman, Sr. Industrial Technician, NLRWU**
Number of IUs Visited: **2**
Name(s) of IUs Visited: **Molex, LLC, 801 Murphy Dr., Maumelle, AR 72113** **Cintas Corp., 102 Champs Blvd., Maumelle, AR 72113**
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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. **One categorical SIU and one non-categorical SIU have been added since the last PCI. None were added in 2020.**

2. Has ADEQ or EPA been notified of these changes? **Yes**

3. HOW OFTEN IS THE INDUSTRIAL USER SURVEY UPDATED? **The program updates the user/waste survey as needed. However, for current SIUs they have found the permit renewal application to provide greater detail than the survey.**

4. What procedures are being used to update the IU Survey? **Currently no updates are required of the survey at this time.**

5. Total number of Significant Industrial Users (SIU), according to the definition used by the POTW (This number must be greater than or equal to the answer to question 6): **19**

6. Number of Categorical Industrial Users: **4**

7. How does the POTW determine the appropriate categorical standards to apply to an IU? **The POTW uses categorical pretreatment standards outlined in 40 CFR but also incorporates local limits into those permits if they are not part of the categorical standards.**

8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphating, zinc plating, etc.). Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Caterpillar	**Metal Finishing**	**Metal Painting**
Koppers Industries	**Timber Products Processing**	**Pressure Treatment**
Molex, LLC.	**Metal Finishing**	**Metal Plating**
Safe Foods	**Organic Chemical, Plastics, and Synthetic Fibers**	**Food Manufacturing**

B. LOCAL LIMITS

1.IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? **Yes, NLRWU is utilizing local limits.**

2. Describe any apparent problems with the local limits. **NLRWU does not have any problems with the current local limits.**

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 of the NPDES permit?

Pollutant:	Sampling Frequency	Permit Requirement	Program Requirement
Metals			
Influent:	**Quarterly**	**Quarterly**	**Quarterly**
Effluent:	**Quarterly**	**Quarterly**	**Quarterly**
Sludge:			
Organics			
Influent:	**Annually**	**Annually**	**Annually**
Effluent:	**Annually**	**Annually**	**Annually**
Sludge:			

Comments: **Metals, Cyanide, and Phenols sampled on March 5, June 25, August 13, and October 22, 2019. Influent and effluent organics were sampled on April 2, 2019.**

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? **No inhibitions or upsets have occurred since the last PCI on March 8, 2017.**

C. INDUSTRIAL USER CONTROL MECHANISM
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? **Yes, NLRWU uses a permit as the control mechanism.**
2. How many IU permits (or other control documents) have been issued? **19**
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. **All permits are effective.**
4. Does the control document contain the following items? List the section of the permit each item is listed under. ***Used Caterpillar Inc. permit to evaluate permit conditions in Questions 4 and 5.**
An expiration date: Cover Page **(9/1/2020 - 8/31/2024)**
Discharge limitations: **Section 4**
If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.
IU self-monitoring requirements: **Section 5**
IU reporting requirements: **Section 6**
5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.
Sample location: **Section 4**
Type of sample: **Section 4**
Monitoring frequency: **Section 4**
Bypass prohibition: **Section 3**
Right of entry: **Section 5**
Non-transferability: **Section 2**
Revocation clause: **Section 2**
Penalty Provisions: **Section 10**
Slug load notification: **Section 3**
Notification of process change: **Section 2**

D. MONITORING OF IUS BY POTW

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

	Current frequency:	Program Requirements:
Sampling		
Categorical IUs	**1-2 times/month**	**Annually**
Other SIUs	**1-2 times/month**	**Annually**
Non-SIUs		
Inspections		
Categorical IUs	**Annually**	**Annually**
Other SIUs	**Annually**	**Annually**
Non-SIUs		

Comments: **No inspection of Safe Foods was conducted in 2019 due to the permit being issued that year.**

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? **The program is inspecting according to Part II, Condition 8.A.ii of the permit and 40 CFR 403.f.2.v.B.**

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 **(*Used Caterpillar November, 14, 2019 inspection)**?

Date and time of inspection: **November 14, 2019 @ 3:00PM**

Officials present: **Mitch Foreman & Chris Lumpkin (NLRWU) and Katina Stephens (Caterpillar)**

Inspection of chemical storage areas: **Yes (Attachment D)**

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. Please describe the overall adequacy of inspection documentation: **Please see Summary of Findings.**

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? **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, but the way the program is designed and the frequency at which staff visit the SIUs they have not had an emergency instance.**
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? **Beth Caipen, Pretreatment Clerk, tracks the receipt of all SIU reports and documentation to include Discharge Monitoring Reports, annual reports, correspondence such as letters, and other documentation. She also enters all DMR data and ensures staff is aware of reported violations.**
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? **The POTW will communicate with the permittee with phone call, email, letter, or personal visit.**
18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?
Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR. ***Reviewed Safe Foods BMR.**
Name and address: **Safe Foods/La Petite Technologies, LLC., 1501 East 8th Street, North Little Rock, AR, 72114**
Other environmental permits held: **ARR001769 (Water, 2398-AR-2 (Air), ARR000030031 (Hazardous Waste)**
Description of operations: **The facility manufactures antimicrobial products for food industries.**
Process flow diagrams: **Yes, Attachment 2**
Flow measurements:
Measurements of regulated pollutants:
Certification of compliance by the IU: **Yes**
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? **Yes, NLRWU has enforcement procedures established through ordinance and an Enforcement Response Plan.**
How does the POTW investigate instances of noncompliance? **NLRWU visits each of the sampling locations at each facility daily so they are aware of any irregularities that may occur. If instances of noncompliance exist they will investigate it further during their visits or through communications**

with the facility.

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

Late reports: **Telephone call, email, letter. Notification is sent prior to deadlines when NLRWU has not received a given report.**

Effluent limitations violations: **Notice of Violation, Corrective Action Report, surcharge fee, potential fine.**

Unpermitted discharges: **Immediate contact is made with the facility. Cease and desist until permitted. NLRWU has not experienced this.**

Slug loads or spills: **Require safeguards through permitting. Notice of Violation, Consent Administrative Order, potential fines, and reimbursement for any costs of upsets to the WWTP.**

Other:

Who is responsible for taking each type of enforcement response?
Pretreatment team is responsible for enforcement responses that are minor in nature. More serious enforcement actions that result in fines, Consent Orders, Show Cause Hearings, Permit Revocations and more will require the attention of the utility Director and/or attorney.

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, a list is published however, no facility has been in significant noncompliance in the last 10 years.**

4. List the SIUs which have met the criteria for Significant Violator (40 CFR 403.8(f)(2)(viii)) 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: **The 2019 annual report showed no SIU's were in significant noncompliance. Fifteen (15) violation notices were sent and 16 noncompliance calls were made.**

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: **St. Vincent - North (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? **The facility has not been in significant noncompliance. The facility was in noncompliance status as noted in the 2019 annual report for failure to submit analytical results but the issue has been resolved.**
5. Comments on multijurisdictional issues: **None**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Molex, LLC., 801 Murphy Dr., Maumelle, AR 72113**
POTW Name: **NLRWU – Maumelle Water Management (AR0033626)**
Industry Contacts: **Derrick Felkins, Plant Manager, 501-803-1263, derrickfelkins@molex.com** **Leland Anderson, EH&S Engineer, 501-803-1140, Leland.anderson@molex.com**
Date and Time of Visit: **January 27 @ 9:00 – 9:40 AM**
Description of Manufacturing Process: **Manufacturing activities include press stamping, electroplating, electroless plating, injection and insert molding and final product assembly. Bronze and copper parts are electroplated with nickel, tin, gold, palladium, and silver. Plastic is molded in thermal plastic molding machines.**
Sources of Process Wastewater: **Wastewater is generated from electroplating processes during manufacturing.**
Categorical Industry? **Yes**
Basis for Limits: **40 CFR 433.17 and Local Limits**
Point of Application: **Process wastewater is collected in a sump and treated through a series of pH adjustment, clarification, and sludge management and then discharged to the NLRWU Maumelle Water Treatment Plant.**
Description of Pretreatment Equipment and Procedures: **Process wastewater flows into a sump where it then flows into a 9,000 gallon collection tank. The pH within this tank is approximately 4.6 SU. Wastewater then flows into a 3,500 gallon tank where the pH is adjusted to approximately 10.5 with sodium hydroxide. Wastewater then flows into another 3,500 gallon tank where pH is again adjusted to approximately 9.0 SU using sulfuric acid. Wastewater then flows into a clarifier then into a 5,600 gallon tank for final pH adjustment to where it reaches a range between 6.0 and 9.0 SU. Sludge is held within a 2,500 gallon holding tanks and the filter pressed and hauled to another facility.**
Spill Prevention and Solvent Management Procedures: **The facility has an SPCC plan. The pretreatment operations, equipment, and chemical storage are all contained in a single area beneath the manufacturing floor. Any potential spills are contained in this area and all materials will flow into the sump and collection tank.**
Sampling Location and Equipment: **Sampling equipment is well maintained and composite sampler is located in a separate area near the loading dock where NLRWU can easily access it. Grab samples are collected as they flow into a covered sump located outside near the loading dock.**

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry:
Cintas Corporation, 102 Champs Blvd., Maumelle, AR, 72112

POTW Name: **NLRWU – Maumelle Water Management (AR0033626)**

Industry Contacts:
Mathew Hoppis, General Manager, 501-803-4488, hoppism@cintas.com
Wyatt Hanson, Production Manager, 501-803-4488, hanson@cintas.com

Date and Time of Visit: **January 27, 2021 @**

Description of Manufacturing Process:
Cintas is an industrial laundry processing rental garments and associated textiles, such as mats, mops, and shop towels. The plant launders and conditions these textiles using detergents and various laundry builders to clean the garments prior to return to customer for reuse. The wash floor operates approximately from (time) to (time), Monday thru Friday, and discharges wastewater continuously during operation.

Sources of Process Wastewater:
Wastewater is generated from sanitary uses, boiler blow down, water softener blow down, and the process water used to clean the garments and associated textiles. Approximately 72,400 gallons of wastewater is generated by the facility per day.

Categorical Industry? **No**

Basis for Limits: **Local limits are applied to this facility.**

Point of Application: **Process wastewater is collected in pits and treated through solids removal through screening, dissolved air floatation, and sludge dewatering. Wastewater is then discharged to the NLRWU Maumelle Water Treatment Plant.**

Description of Pretreatment Equipment and Procedures: **Process wastewater flows to two holding pits where solids such as lint are removed. Wastewater then flows to a 33,000 gallon EQ tank and into a DAF unit where a flocculant and coagulant are added. Treated wastewater then is discharged to the NLRWU and solids are removed using a filter press.**

Spill Prevention and Solvent Management Procedures: **The facility has a Spill Control Plan. All internal drains within the facility drain to the two, 9,000 gallon pretreatment pits where the wastewater will be pretreated prior to discharge to the NLRWU. The facility identified other potential problem areas as being the three large bulk storage tanks and those are protected by a coated containment area large enough to contain the contents of the largest tank. Another area was the small day tanks which have overfill protection and require a staff member to physically be present during the filling process. Chemicals are stored within the wastewater room and are stored in 55-gallon drum.**

Sampling Location and Equipment: **An ISCO 3710 refrigerated composite sampler is located is a separate area at the rear of the facility in a**

secured location. The composite sampling tube is set inside a concrete kettle structure that receives the pretreatment plant discharge. The kettle structure is located next to the composite sampler. Grab samples are also collected from this kettle structure. All pretreatment components were well operated and maintained.

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:55**
Witness:				Photo #:	**1**
Description:	**DSCN2018: Holding pits 1 and 2 with solid separator on top of the pits.**				

Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:56**
Witness:				Photo #:	**2**
Description:	**DSCN2021: 30,000 gallon equalization tank.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:58**
Witness:				Photo #:	**3**
Description:	**DSCN2025: Floatables on surface of the DAF unit.**				

Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:58**
Witness:				Photo #:	**4**
Description:	**DSCN2026: Water discharge from the DAF unit.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:59**
Witness:				Photo #:	**5**
Description:	**DSCN2028: Sludge filter press.**				

Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**10:04**
Witness:				Photo #:	**6**
Description:	**DSCN2032: Final discharge from pretreatment facility to NLRWU.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**10:05**
Witness:				Photo #:	**7**
Description:	**DSCN2035: Composite sampler located in a separate room to the rear of the facility.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:21**
Witness:				Photo #:	**1**
Description:	**DSCN2006: Collection tank.**				

Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:21**
Witness:				Photo #:	**2**
Description:	**DSCN2007: Gross pH adjustment tank.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:22**
Witness:				Photo #:	**3**
Description:	**DSCN2008: Fine pH adjustment tank.**				

Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:22**
Witness:				Photo #:	**4**
Description:	**DSCN2009: Clarifier unit.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:23**
Witness:				Photo #:	**5**
Description:	**DSCN2010: Final pH adjustment tank.**				

Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:23**
Witness:				Photo #:	**6**
Description:	**DSCN2012: ISCO discharge flow meter.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:25**
Witness:				Photo #:	**7**
Description:	**DSCN2014: Pretreated process wastewater discharge.**				

Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:10**
Witness:				Photo #:	**8**
Description:	**DSCN2004: ISCO 3710 refrigerated composite sampler bottle.**				

Office of Water Quality Photographic Evidence Sheet					
Location:	**NLRWU - Pretreatment**				
Photographer:	**Jason Bolenbaugh**	Date:	**1/27/2021**	Time:	**09:29**
Witness:				Photo #:	**9**
Description:	**DSCN2016: Dried sludge from the filter press.**