



February 9, 2023

Enforcement Division
Arkansas Department of Energy & Environment
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Non-compliance report for January 2023; Faulkner Lake AR0020303

The following is a description of the non-compliance for January 2023:

1. Description of the non-compliance:

- a) Effluent exceeded 7-Day average of 45 mg/L for TSS.
- b) Frequency analysis not met.

2. Duration of the non-compliance:

- a) 2 days: January 3rd and January 4th, 2023
- b) 2 days: January 25th and January 29th, 2023

3. Cause of non-compliance:

- a) A heavy rain event occurred the night of January 2nd through the early morning of January 3rd. Both normally scheduled operators were out sick, and the shifts were covered by an operator with only 1 month experience. The plant experienced high flows, and the on-duty operator failed to bring additional secondary clarifiers online to compensate.
- b) The effluent flow meter signal coming into SCADA became erratic during the overnight hours leading into January 25th and January 29th. It was discovered the next morning on both days that the GFI outlet the effluent sampler is plugged into tripped, causing the effluent sampler to power down and break the effluent flow signal to the sampler. This caused several hours of samples to be missed, therefore resulting in an interruption to the compositing period.

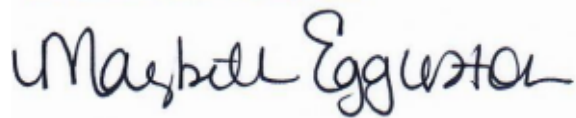
Measures to prevent or minimize the occurrence of the above non-compliances:

- a) All operators have received documented refresher training on the secondary clarifier operating procedures. New SCADA programming has also been implemented to alarm if number of clarifiers online is not sufficient for the flow rate.

- b) The bad GFI outlet was replaced with a standard 20-amp duplex receptacle to prevent future occurrences. Replacing the GFI outlet with a 20-amp duplex receptacle will eliminate the chance of the sampler powering down due to a tripped outlet and will also allow the backup generator to start the sampler back automatically if there is a power failure.

For further information, please call me at 501-945-7186.

North Little Rock Wastewater Utility



Marybeth Eggleston
Environmental Compliance and Safety Manager