



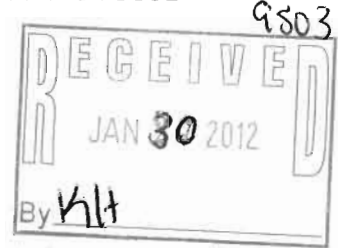
AKFR 08

NORTH LITTLE ROCK WASTE WATER UTILITY

January 23, 2012

Certified Mail #7007 0710 0000 0754 9801

Allen Gilliam, State Pretreatment Coordinator
Arkansas Department of Environmental Quality
5301 North Shore Drive
North Little Rock, AR 72118



Re: Responses to requirements and recommendations listed in ADEQ audit/assessment letter dated January 6, 2012, City of North Little Rock (NPDES Tracking #AR0020303; AFIN #6000274) Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Gilliam,

The above referenced letter was received and reviewed. Please find listed below the required actions listed with the actions taken to become compliant.

B) FINDINGS WITH REQUIRED ACTIONS:

- 1) Under 40 CFR 403.8(f)(2)(i), "[NLR will] Identify and locate all possible Industrial Users [IUs] which might be subject to the [City's] Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the [ADEQ] upon request..."

Response: Actions taken to correct this deficiency, the Utility will develop and maintain a master list of Industrial users/businesses surveyed.

- 2) Under 40 CFR 403.8(f)(1)(B), "...individual...control mechanisms must be enforceable and contain, at a minimum, the following conditions...(3) Effluent limits...based on...categorical Pretreatment Standards..."

- a) It was discovered during the file review that Koppers permit limits: based on the Timber Products Processing under 40 CFR 429.95 listed the category's "Oil and Grease" parameter as "FOG"(fats, oils and grease).

Response: Actions taken to correct this deficiency, the Utility has changed Koppers Wastewater Discharge Permit parameters from Fats, Oils and Grease (FOG) to Oil and Grease (O&G), as written in 40 CFR 429.95.

- b) It was discovered during the file review that Caterpillar's permit limits included "Instantaneous & Daily Maximums" (see Attch. A-3n).

The Metal Finishing Standards under 40 CFR 433 were developed on the basis of 24 hour flow-proportioned composite sampling to take into account daily fluctuations in wastewater characteristics and strength. Unless the City can historically demonstrate Caterpillar's wastewater does not fluctuate, but remains at a static strength (in mg/l) for any parameter over a 24 hour period, remove the "Instantaneous & Daily Maximums" from their Section 4- Effluent Limitations page and adhere to what is dictated in 40 CFR 433.17: Maximum for 1 day.

ok Response: Actions taken to correct this deficiency, the Utility has removed the Instantaneous & Daily Maximums from Caterpillar's Wastewater Discharge Permit and replaced them with "Maximum for any 1 day", as written in 40 CFR 433.17.

- 3) Under 40 CFR 403.12(b), "...At least 90 days prior to commencement of discharge, New Sources, and sources that become Industrial Users subsequent to the promulgation of an applicable Categorical Standard, shall be required to submit to [NLR] a report which contains the information listed in paragraphs (b)(1)-(5) of this section...(3) Description of operations. [Caterpillar] shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by [Caterpillar]. This description should include a schematic process diagram which indicates points of Discharge to [NLR] from the regulated processes."

During the file review and subsequent site visit at Caterpillar, it was discovered a current/accurate schematic of their wastewater generating processes and flow was not on file. This made for some confusion during the site visit as this auditor could not fully understand the regulated wastewater flows from generation through pretreatment to the final discharge/sampling point. The City must require Caterpillar to submit a comprehensive, current and accurate schematic process diagram indicating wastewater flows.

ok Response: Actions taken to correct this deficiency, the Utility will require Caterpillar to submit a comprehensive, current and accurate schematic process diagram indicating wastewater flows.

- 4) Under 40 CFR 433.12(a), "In lieu of requiring monitoring for TTO, [NLR] may allow [Caterpillar] to make the following certification statement: "Based on my inquiry of the person or facility is implementing the toxic organic management plan submitted to [NLR]."

Caterpillar has submitted a Toxic Organic Management Plan (TOMP) to satisfy the above waiver. The City must respond in writing to Caterpillar their TOMP was approved for them to continue making the certification statement in lieu of testing for the list of toxic organics in 40 CFR 433.11(e). With no documentation in the file showing the City has approved Caterpillar's TOMP, it is uncertain whether the City has even reviewed it.

J Response: Actions taken to correct this deficiency, the Utility has sent a letter to Caterpillar, stating that the Utility has received their Toxic Organic Management Plan (TOMP) and has reviewed and approved it. By the plan being approved by the Utility it can continue to make their certification statement in lieu of monitoring for TTO.

✓ C) RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF
PRETREATMENT AND POLLUTION PREVENTION PROGRAMS

Response: The Utility is reviewing and considering the seven recommendations that you included in your audit/assessment.

Again, we appreciate your input and recommendations as we work towards continuous improvement of our pretreatment program.

If you should have any questions concerning the above responses, please feel to contact me at (501) 945-7186 ext. 117.

NORTH LITTLE ROCK WASTE WATER UTILITY



Emric F. Roll
Pretreatment Coordinator, NLRWWU

cc: Marc Wilkins, Director, NLRWWU