

Little Rock 2019 Pretreatment Program Annual Report

Yates, Adam

Thu 5/28/2020 5:28 PM

To: Megan Jones <Megan.Jones@lrwra.com>;

Cc: Healey, Richard <HEALEYR@adeq.state.ar.us>; Ramsey, David <RAMSEY@adeq.state.ar.us>; Allen-Daniel, Leslie <ALLEN-DANIEL@adeq.state.ar.us>;

Megan,

Little Rock Water Reclamation Authority's March 2020 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 CFR 403.12(i).

Thank you for your timely submittal. If you have any questions or concerns on this matter, please feel free to contact me.

Kindly,

Adam Yates | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118
t: (501) 682-0617 | e: yates@adeq.state.ar.us



March 27, 2020

Adam Yates
State Pretreatment Coordinator
Office of Water Quality
5301 Northshore Drive
North Little Rock, AR 72118

RE: 2019 Annual Pretreatment Program Report
NPDES PERMIT AR0021806 – Adams Field Water Reclamation Facility
NPDES PERMIT AR0040177 – Fourche Creek Water Reclamation Facility
NPDES PERMIT AR0050849 – Little Maumelle Water Reclamation Facility

Adam,

The included documents demonstrate compliance with the requirements found in General Pretreatment Regulations, 40 CFR Part 403.12(i), and the referenced NPDES permits issued to Little Rock Water Reclamation Authority (LRWRA). During 2019, LRWRA continued activities pursuant to maintaining compliance with the General Pretreatment Regulations. Attachments I-IV include the influent and effluent metals for the treatment facilities, an updated list of significant industrial users, industries that received significant noncompliance, and additional information on industrial user compliance and enforcement actions.

If you have any questions concerning any of the information submitted or require additional information, do not hesitate to contact Megan Jones, Pretreatment Program Administrator, at (501) 688-1495.

Sincerely,

Jamie Ewing, Director
Environmental Assessment Department
Little Rock Water Reclamation Authority

Cc: Greg Ramon, LRWRA CEO
Jean Block, LRWRA CLO
Walter Collins, Director of Operations
Eric Wassell, Operations Superintendent
Megan Jones, Pretreatment Program Administrator
Mikel Murders, Environmental Sampling Administrator
Rebecca Burkman, Laboratory Administrator

Little Rock Water Reclamation Authority
Annual Pretreatment Program Report
January 1, 2019 – December 31, 2019

Little Rock Water Reclamation Authority's (LRWRA) mission is to preserve and replenish the environment by reclaiming the most valuable natural resource, water. The Environmental Assessment Department (EAD) Pretreatment Program supports LRWRA's mission by protecting utility infrastructure and monitoring and limiting pollutants discharged by industries and other non-domestic wastewater sources. There were no violations at Fourche Water Reclamation Facility (FCWRF) or Adams Field Water Reclamation Facility (AFWRF) that resulted from permitted Industrial Users' (IUs) wastewater discharges. There are no permitted IUs that discharge to the Little Maumelle Water Reclamation Facility.

LRWRA's approved Pretreatment Program is extensive. Of the 42 permitted IUs, 12 are Categorical and regulated by 40 CFR 433. Seventeen of the permittees are Significant IUs, which contribute greater than 25,000 gallons per day to LRWRA's treatment plants. The permit for Baptist Health Laundry was closed because the Laundry is no longer operating. One facility, Ozark Point Water Treatment Plant, shutdown for construction improvements and has not been discharging any process wastewater since spring 2019. Therefore, there was only a single sampling event for that facility.

Additionally, the pretreatment department develops a thorough list of IUs to survey. This list includes IUs in multijurisdictional areas and is compiled using a multitude of sources as listed in LRWRA's Pretreatment Program Manual. The IU list includes businesses that were surveyed 5 years ago. During 2019, 10 Industries were surveyed and 7 were followed up with a site visit.

There was a lower number of enforcement actions in 2019 than in 2018 (12 versus 30). At the time of this report, all industries are currently in compliance. The 12 enforcement actions taken in 2019 were all for pH violations. There were no industries in Significant Non-Compliance for the 2019 year. Apart from enforcement, LRWRA's EAD works jointly with IUs to address all compliance issues and assist with compliance.

POLLUTANT (Total)	MAHC ² (µg/l)	INFLUENT DATES SAMPLED (µg/l) once/quarter				WQ level / limit ² (µg/l)	EFFLUENT DATES SAMPLED (µg/l) once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL ¹ (µg/l)	EPA Method Used ¹	Detection Level Achieved (µg/l)
		03/07/19	06/13/19	08/08/19	11/14/19		03/07/19	06/13/19	08/08/19	11/14/19			
Cyanide	90	<3.50	<3.50	6.3	<3.50	N/A	<3.50	<3.50	<3.50	<3.50	3.5	200.7/ 200.8	2
Phenols	N/A	27.2	42.3	38.6	43.2	N/A	6.40	<3.90	<3.90	<3.90	5	200.7/ 200.8	50/100
Mercury	0.20	0.115	0.055	0.037	0.036	N/A	0.004	0.006	0.011	0.005	0.002	200.7	2/10
Flow, MGD	N/A	24.26	19.64	15.42	22.50	N/A	21.82	18.32	13.00	15.97	N/A	N/A	N/A
POLLUTANT (Total)	MAHC ² (µg/l)	INFLUENT DATES SAMPLED (µg/l) once/year				WQ level / limit ² (µg/l)	EFFLUENT DATES SAMPLED (µg/l) once/year				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL ¹ (µg/l)	EPA Method Used ¹	Detection Level Achieved (µg/l)
		07/15/19					07/15/19						
Barium	N/A	40				N/A	15				N/A	200.7/ 200.8	2
Boron	N/A	94				N/A	<100				N/A / 100	200.7/ 200.8	50/100
Manganese	N/A	270				N/A	280				N/A	200.7	2/10
Flow, MGD	N/A	45.94				N/A	37.00				N/A	N/A	N/A

¹ It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.**

² This value was calculated during the development of technically based local limits (TBLLs) based on State WQ criteria, EPA guidance, and either ADEQ Pretreatment staff Excel spreadsheets or the permittee's consultant with concurrence from ADEQ Pretreatment staff.

³ Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

MAHC - Maximum Allowable Headworks Concentration

WQ - "Water Quality Levels not to exceed" OR actual permit limit.

POLLUTANT (Total)	MAHC ² (µg/l)	INFLUENT DATES SAMPLED (µg/l) once/quarter				WQ level / limit ² (µg/l)	EFFLUENT DATES SAMPLED (µg/l) once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL ¹ (µg/l)	EPA Method Used ¹	Detection Level Achieved (µg/l)
		03/07/19	06/13/19	08/08/19	11/14/19		03/07/19	06/13/19	08/08/19	11/14/19			
Cyanide	90	<3.50	<3.50	4.2	<3.5	116	<3.50	<3.50	7.4	<3.50	3.5	SM-4500	3.5
Mercury	0.20	0.084	0.031	0.120	0.030	N/A	0.006	0.008	0.012	0.004	0.002	1631E	0.0002
Flow, MGD	N/A	8.22	6.34	7.06	9.11	N/A	7.94	7.01	6.87	9.64	N/A	N/A	N/A
POLLUTANT (Total)	MAHC ² (µg/l)	INFLUENT DATES SAMPLED (µg/l) once/quarter				WQ level / limit ² (µg/l)	EFFLUENT DATES SAMPLED (µg/l) once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL ¹ (µg/l)	EPA Method Used ¹	Detection Level Achieved (µg/l)
		03/07/19	06/13/19	08/08/19	12/11/19		03/07/19	06/13/19	08/08/19	11/14/19			
Phenols	N/A	49.9	41.4	84.6	73.1	N/A	13.1	<3.9	<3.9	<3.9	10	420.1	3.9
Flow, MGD	N/A	8.22	6.34	7.06	5.71	N/A	7.94	7.01	6.87	9.64	N/A	N/A	N/A
POLLUTANT (Total)	MAHC ² (µg/l)	INFLUENT DATES SAMPLED (µg/l) once/quarter				WQ level / limit ² (µg/l)	EFFLUENT DATES SAMPLED (µg/l) once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL ¹ (µg/l)	EPA Method Used ¹	Detection Level Achieved (µg/l)
		01/14/19					01/15/19						
Barium	N/A	40				N/A	6.8				N/A	200.7/ 200.8	2
Boron	N/A	<100				N/A	<100				N/A	200.7/ 200.8	100
Manganese	N/A	230				N/A	210				N/A	200.7	2
Flow, MGD	N/A	8.98				N/A	8.78				N/A	N/A	N/A

¹ It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.**

² This value was calculated during the development of technically based local limits (TBLLs) based on State WQ criteria, EPA guidance, and either ADEQ Pretreatment staff Excel spreadsheets or the permittee's consultant with concurrence from ADEQ Pretreatment staff.

³ Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

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ATTACHMENT I
MONITORING RESULTS FOR ANNUAL PRETREATMENT REPORT
REPORTING YEAR: 01/01/2019 TO 12/31/2019
PERMITTEE NAME: Little Maumelle Water Reclamation Facility NPDES PERMIT NO. AR0050849
AVERAGE POTW FLOW: 2.59 MGD PERCENT INDUSTRIAL FLOW: 0%

POLLUTANT (Total)	MAHC ² (µg/l)	INFLUENT DATES SAMPLED (µg/l) once/year				WQ level / limit ² (µg/l)	EFFLUENT DATES SAMPLED (µg/l) once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL ¹ (µg/l)	EPA Method Used ¹	Detection Level Achieved (µg/l)
		03/26/19	07/29/19	08/08/19			03/26/19	07/30/19	08/08/19	09/03/19			
Antimony	N/A		<60.0			N/A		<60			60	200.7/ 200.8	30/60
Arsenic	14		1.3			N/A		0.7			0.5	200.8	0.5
Beryllium	N/A		<0.5			N/A		<0.5			0.5	200.8	0.5
Cadmium	9		<0.5			N/A		<0.5			0.5	200.8	0.5
Chromium	260		10			N/A		<10			10	200.8	10
Copper	270		21.0			N/A		10.0			0.5	200.8	0.5
Lead	50		0.9			N/A		<0.5			0.5	200.8	0.5
Molybdenum	N/A		<10			N/A		<10			10	200.8	10
Nickel	160		4.4			N/A		3.6			0.5	200.8	0.5
Selenium	10		<5			N/A		<5			5	200.8	2/5
Silver	180		<0.5			N/A		<0.5			0.5	200.8	0.5
Thallium	N/A		<0.5			N/A		<0.5			0.5	200.8	0.5
Zinc	360		120			N/A		85			20	200.8	10/20
Cyanide (t)	90	<3.4				N/A	<3.4				3.4	SM-4500	3.5
Phenols	N/A	140.7				N/A	<3.9				3.9	420.1	3.9
Mercury, Hg(t)	0.20			0.243		N/A			0.002		0.002	1631E	0.0002
Barium, Ba(t)	N/A		21			N/A		13			N/A	200.8	2
Boron, B(t)	N/A		280			N/A				210	N/A	200.8	50
Manganese, Mn(t)	N/A		350			N/A		39			N/A	200.7/ 200.8	2
Flow, MGD	N/A	2.00	1.70	1.72		N/A	1.76	1.88		1.66	N/A	N/A	N/A

- ¹ It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.**
- ² This value was calculated during the development of technically based local limits (TBLLs) based on State WQ criteria, EPA guidance, and either ADEQ Pretreatment staff Excel spreadsheets or the permittee's consultant with concurrence from ADEQ Pretreatment staff.
- ³ Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

MAHC - Maximum Allowable Headworks Concentration

WQ - "Water Quality Levels not to exceed" OR actual permit limit.

**ATTACHMENT II
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST**

Industrial User Name	SIC	NAICS	Categorical Determination	Treatment Plant	Control Document		New User	Times Inspected	Times Sampled	Compliance Status				
					Last Action	Y/N				Reports				Effluent Limits
										BMR	90-Day Compliance	Semi-Annual	Self Monitoring	
Arkansas Painting and Specialties	3429	332510	40 CFR 433	Adams Field	RENEWED 01/01/2018	Y	N	1	0	RD 02/10/2006	RD*	RD	RD	C - NO 433 DISCHARGE
Cameron V&M	3491	332911	40 CFR 433	Fourche Creek	RENEWED 10/01/2018	Y	N	1	4	NR	RD*	NR	NR	C - NO 433 DISCHARGE
Central Flying Service, Little Rock	4581	488190	40 CFR 433	Adams Field	RENEWED 09/01/2018	Y	N	1	4	NR	NR	NR	NR	C - NO 433 DISCHARGE
CertainTeed Corporation	2952	324122	40 CFR 443	Adams Field	RENEWED 05/01/2018	Y	N	1	2	RD 04/14/2000	RD	RD	RD	C
Dassault Falcon Jet Corporation	3728	336413	40 CFR 433	Adams Field	RENEWED 12/01/2018	Y	N	1	5	RD 09/09/1990	RD*	NR	NR	NO 433 DISCHARGE
Hillcrest Camshaft Service, Inc.	3714	336310	40 CFR 433	Fourche Creek	RENEWED 10/01/2018	Y	N	1	8	RD 11/20/1995	RD*	NR	NR	C - NO 433 DISCHARGE
Interstate Highway Sign	3993	339950	40 CFR 433	Fourche Creek	RENEWED 02/01/2018	Y	N	1	22	RD 03/25/1992	RD	RD	RD	NC - pH (2)
PPG Industries	2851	325510	40 CFR 446	Fourche Creek	RENEWED 07/01/2018	Y	N	1	4	NR	NR	NR	NR	C - NO 446 DISCHARGE
Rhein Chemie Little Rock	3061	326291	40 CFR 428	Fourche Creek	RENEWED 10/15/2018	Y	N	2	4	NR	NR	NR	NR	C - 428
St. Vincent Hospital	8062 2834	622110 325412	40 CFR 439	Adams Field	RENEWED 03/01/2018	Y	N	1	9	RD 05/14/2004	RD*	NR	NR	C - NO 439 DISCHARGE
Welspun Tubular	3317	331210	40 CFR 433	Fourche Creek	RENEWED 06/01/2018	Y	N	3	27	RD 11/30/2007	RD	RD	RD	NC - pH (2)
Welspun Tubular HFW	3317	331210	40 CFR 433	Fourche Creek	RENEWED 04/01/2019	Y	N	2	24	RD 01/17/2013	RD	RD	RD	C
Ameripride Services	7218	812332	N/A	Adams Field	RENEWED 1/01/2018	Y	N	1	12	NR	NR	BY POTW	NR	C
Arkansas Children's Hospital	8062	622110	N/A	Adams Field	RENEWED 01/01/2018	Y	N	1	30	NR	NR	BY POTW	NR	C

Include NAICS code(s)

3rd column – include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)

Please footnote N/A reason

**ATTACHMENT II
 PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST**

Industrial User Name	SIC	NAICS	Categorical Determination	Treatment Plant	Control Document		New User	Times Inspected	Times Sampled	Compliance Status				
					Last Action	Y/N				Reports				Effluent Limits
										BMR	90-Day Compliance	Semi-Annual	Self Monitoring	
Arkansas Heart Hospital	8062	622110	N/A	Adams Field	RENEWED 02/01/2019	Y	N	1	8	NR	NR	BY POTW	NR	C
Arkansas State Hospital	8063	622210	N/A	Adams Field	RENEWED 05/01/2017	Y	N	1	8	NR	NR	BY POTW	NR	C
Baptist Health Laundry	7218	812332	N/A	Fourche Creek	Permit Closed 09- 2019	Y	N	3	1	NR	NR	BY POTW	NR	C
Baptist Health Medical Center	8062	622110	N/A	Adams Field	RENEWED 07/01/2017	Y	N	1	24	NR	NR	BY POTW	NR	C
Central AR Veterans Healthcare System	8062	622110	N/A	Adams Field	RENEWED 06/01/2018	Y	N	2	4	NR	NR	BY POTW	NR	C
City of Little Rock Solid Waste	4953	562212	N/A	Fourche Creek	RENEWED 04/01/2018	Y	N	1	3	NR	NR	BY POTW	NR	C
Darling Ingredients	2077 4214	311613 4844110	N/A	Fourche Creek	RENEWED 05/01/2018	Y	N	1	0	NR	NR	BY POTW	NR	C-NO DISCHARGE
Fiber Glass Systems	3089	326122	N/A	Fourche Creek	RENEWED 12/1/19	Y	N	1	4	NR	NR	BY POTW	NR	C
Hiland Dairy	2026	311511	N/A	Fourche Creek	RENEWED 10/01/2019	Y	N	1	25	NR	NR	BY POTW	NR	NC - pH (3)
Jack Wilson WTP	4941	221310	N/A	Adams Field	RENEWED 02/01/2018	Y	N	1	24	NR	NR	BY POTW	NR	C
Little Rock Quick Rice	2038 2044	311212	N/A	Fourche Creek	EXTENDED 9/15/2019	Y	N	9	282	NR	NR	BY POTW	NR	NC - pH (5)
Ozark Point WTP	4941	221310	N/A	Adams Field	RENEWED 12/01/2019	Y	N	1	1	NR	NR	BY POTW	NR	C
Porocel Corporation	2819	331311	N/A	Fourche Creek	RENEWED 07/01/2019	Y	N	1	11	NR	NR	BY POTW	NR	C

Include NAICS code(s)
 3rd column – include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)
 Please footnote N/A reason

**ATTACHMENT II
 PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST**

Industrial User Name	SIC	NAICS	Categorical Determination	Treatment Plant	Control Document		New User	Times Inspected	Times Sampled	Compliance Status				
					Last Action	Y/N				Reports				Effluent Limits
										BMR	90-Day Compliance	Semi-Annual	Self Monitoring	
Skippy Foods LLC	2099	311911	N/A	Fourche Creek	RENEWED 04/01/2019	Y	N	2	11	NR	NR	BY POTW	NR	C
Univ. of Ark. Medical Center	8062	622110	N/A	Adams Field	RENEWED 02/01/2017	Y	N	2	4	NR	NR	BY POTW	NR	C

Include NAICS code(s)
 3rd column – include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)
 Please footnote N/A reason

**ATTACHMENT IV
PRETREATMENT PERFORMANCE SUMMARY (PPS)**

NOTE: All questions refer to the Industrial Pretreatment Program as approved by the ADEQ. The permittee should not answer the questions based on changes made to the Approved Program without Department Authorization.

I. General Information

Control Authority Name: Little Rock Water Reclamation Authority

Mailing Address: 11 Clearwater Drive

City: Little Rock State / Zip Code: Arkansas / 72204

Pretreatment Contact: Megan Jones Title: Pretreatment Program Administrator

Contact Telephone Number: (501) 688-1495

NPDES Permit Number(s): AR 0040177, AR 0021806 and AR 0050849

Reporting Period: January 1, 2019 (Beginning month, day, and year) December 31, 2019 (Ending month, day, and year)

Total Number of Categorical IUs: 12

Total Number of Significant Non-categorical IUs: 17

Total Number of Non-significant (yet permitted) IUs: 14

II. Significant Industrial User Compliance

	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Non-categorical</u>
1) Number of SIUs Submitting BMRs	0	N/A
Total Number Required	0	N/A
2) Number of SIUs Submitting 90-day Compliance Reports	0	N/A
Total Number Required	0	N/A
3) Number of SIUs Submitting Semiannual Reports	12	17
Total Number Required	12	17
4) Number of SIUs Meeting Compliance Schedule	0	1
Total Number Required to Meet Schedule	0	1

5) Number of SIUs in Significant Noncompliance	<u>0</u>	<u>0</u>
Total Number of SIUs	<u>0</u>	<u>0</u>
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and non-categorical)		<u>0</u>

III. Compliance Monitoring Program

	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Non-categorical</u>
1) Number of Control Documents Issued	<u>1</u>	<u>7</u>
Total Number Required	<u>1</u>	<u>7</u>
2) Number of Non-sampling Inspections Conducted	<u>12</u>	<u>17</u>
Total Number Required	<u>12</u>	<u>17</u>
3) Number of Sampling Visits Conducted	<u> </u>	<u> </u>
Total Number Required	<u> </u>	<u> </u>
4) Number of Facilities Inspected (non-sampling)	<u>12</u>	<u>17</u>
Total Number Required	<u>12</u>	<u>17</u>
5) Number of Facilities Sampled	<u>12</u>	<u>17</u>
Total Number Required	<u>12</u>	<u>17</u>

IV. Enforcement Actions

	<u>Significant Industrial Users</u>	
	<u>Categorical</u>	<u>Non-categorical</u>
1) Number of Compliance Schedules Issued	<u>0</u>	<u>1</u>
Total Number of Schedules Required	<u>0</u>	<u>1</u>
2) Number of Notices of Violation Issued to SIUs	<u>4</u>	<u>8</u>
3) Number of Administrative Orders Issued to SIUs	<u>0</u>	<u>0</u>
4) Number of Civil Suits Filed	<u>0</u>	<u>0</u>
5) Number of Criminal Suits Filed	<u>0</u>	<u>0</u>
6) Number of Significant Violators (attach newspaper publication)	<u>0</u>	<u>0</u>

27) Amount of Penalties (not surcharges) Collected		
(Total Dollars)	\$580.46	\$6598.26
(Total Number of IUs Assessed)	2	3
8) Other Actions (sewer bans, etc.)	0	1

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

Authorized
Representative:

Jamie Lewing

Date: 3/27/2020