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ARKANSAS
Department of Environmental Quality

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AE
no action
necessary

April 10, 2006

Rick Barger, Director of Operations
Little Rock Wastewater Utility
221 E. Capitol
Little Rock, AR 72202

Re: AFIN:60-00409 NPDES Permit No. AR0021806

Dear Mr. Barger:

On April 6, 2006 through April 7, 2006, Inspectors Lisa Jacobs, Eric Fleming, and I performed a pretreatment inspection of your 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.

This inspection revealed that you are in compliance with terms of your permit. However, your facilities pretreatment program has not been updated to reflect the recent streamlining changes made to 40 CFR 403. Your facility is given until October 31, 2006 to update your pretreatment program.

If I can be of any assistance, please contact me at (501)682-0658 or Allen Gilliam at (501)682-0625.

Sincerely,

Zachary T. Watson
Field Inspector
Water Division

cc: NPDES Enforcement Branch

NPDES COMPLIANCE FILES
NPDES # 21806
DMR'S SP
NCR coded
 CORRESPONDENCE
 CRAS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3	A R 0 0 2 1 8 0 6	1 1 0 6 0 4 0 7 1 7 8	P	1 9 S 20	1
Remarks					
A F I N 6 0 - 0 0 4 0 9 P u l a s k i C o u n t y					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
6 7 2 6 9	7 0 N	7 1 N	7 2 N 3	7 4 7 5	8 0

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Little Rock Wastewater Utility 1001 Temple Little Rock, AR	Entry Time /Date 0845 on April 6, 2006	Permit Effective Date October 1, 2001						
	Exit Time/Date 1250 on April 7, 2006	Permit Expiration Date September 30, 2006						
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jeff Davis / Pretreatment Coordinator / (501) 688-1547 Susan Samples Ledbetter / Pretreatment Coordinator / (501) 688-1532	Other Facility Data N/A							
Name, Address of Responsible Official/Title/Phone and Fax Number Rick Barger - Director of Operations / 501-376-2903 221 E. Capitol Little Rock, AR 72202	<table border="1"> <tr> <td></td> <td><u> </u></td> </tr> <tr> <td>Ye</td> <td></td> </tr> <tr> <td>s</td> <td>x No</td> </tr> </table>			<u> </u>	Ye		s	x No
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Ye								
s	x No							

Section C: Areas Evaluated During Inspection

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

S Permit	N Flow Measurement	N Operations & Maintenance	N Sampling
N Records/Reports	N Self-Monitoring Program	N Sludge Handling/Disposal	N Pollution Prevention
N Facility Site Review	N Compliance Schedules	S Pretreatment	N Multimedia
N Effluent/Receiving Waters	N Laboratory	N Storm Water	N Other: (Section D) Self-Monitoring

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

There were no violations noted at the time of this inspection. However the pretreatment program was not up to date with the new revised/streamlined 40 CFR 403. The facility was given the deadline of October 31, 2006 to have the pretreatment program updated. Three industrial users were inspected during the inspection: Ace Plating Works, Odom's Tennessee Pride Sausage, and Diamond Bear Brewery.

Name(s) and Signature(s) of Inspector(s) Zachary Watson / Eric Fleming / Lisa Jacobs /	Agency/Office/Telephone/Fax ADEQ / Little Rock / (501) 682-0658 / 682-0910	Date April 7, 2006
Signature of Management QA Reviewer 	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

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Name of Municipality: Little Rock, Arkansas

AFIN Number: 60-00409

NPDES Permit Numbers: AR0021806 / AR0040177

Program Tracked under NPDES Permit Number: AR0021806

Fact Sheet Preparation Date: Unknown

Date of Last Audit: December 10, 2003 to December 13, 2003

Date of Last Annual Report: March 31, 2006

Name of Inspector: Zachary Watson / Eric M. Fleming / Lisa Jacobs

Date PCI Performed: May 5-7, 2004

Name, Title, and Telephone Number of Facility Representative: Jeff Davis, Pretreatment Supervisor,
501-688-1547

Name and Title of Other Participants: Susan Ledbetter, Pretreatment Supervisor

Number of IUs Visited: 3

Name(s) of IUs Visited: Ace Plating Works, Odom's Tennessee Pride Sausage, Diamond Bear Brewery

Note: AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

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NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

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Form approved July 1989

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. **Deleted** – Ace Plating Works and Archer Daniel Midland.
Added – Air Transport International and Heart Hospital
2. Has ADEQ or EPA been notified of these changes? Yes (Heart Hospital added after Annual Report)
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes
4. What procedures is being used to update the IU Survey? IU Survey kept updated by reviewing Chamber of Commerce bi-annual reports, reviewing engineering plans, reviewing telephone directory's, and LINKO Database.
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 38
6. Number of Categorical Industrial Users: 17
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Based on the SIC Code and the type of process, the appropriate categorical standards are applied according to Federal Regulations, & the NAICS - North American Industry Classification System (replacing SIC Codes)
8. List all categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (such as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
<u>Air Transport International</u>	<u>40-CFR 433</u>	<u>Aircraft Brake Repair</u>
<u>Arkansas Painting and Specialties</u>	<u>40-CFR 433</u>	<u>Phosphate Coating</u>
<u>Central Jet Group – Little Rock</u>	<u>40-CFR 433</u>	<u>Aircraft Refurbishing</u>
<u>CertainTeed Corporation</u>	<u>40-CFR 433</u>	<u>Asphalt Rolled Roofing Production</u>
<u>Dassault Falcon Jet Corporation</u>	<u>40-CFR 433</u>	<u>Custom Jet Aircraft</u>
<u>Essick Air Products</u>	<u>40-CFR 433</u>	<u>Iron Phosphate Coating</u>
<u>Hillcrest Camshaft Service Inc.</u>	<u>40-CFR 433</u>	<u>Electroplating New Source</u>
<u>Interstate Highway Sign Company</u>	<u>40-CFR 433</u>	<u>Highway Signs</u>

<u>Orbit Valve Company</u>	<u>40-CFR 433</u>	<u>Steel Oil Field Valves</u>
<u>Quality Bearing</u>	<u>40-CFR 433</u>	<u>Chrome Plating</u>
<u>Raytheon Aircraft Company</u>	<u>40-CFR 433</u>	<u>Custom Jet Aircraft</u>
<u>Silverwood Products</u>	<u>40-CFR 433</u>	<u>Framed Mirrors</u>
<u>Smith Glass and Mirror</u>	<u>40-CFR 433</u>	<u>Resilver Mirrors</u>
<u>St. Vincent Hospital</u>	<u>40-CFR 439</u>	<u>Hospital/PETNET</u>
<u>Tire Cure Bladders</u>	<u>40-CFR 428</u>	<u>Rubber Tire Curing Bladders</u>
<u>Wheatland Tube Omega Division</u>	<u>40-CFR 420</u>	<u>Iron and Steel Coating (Pipe/Tube)</u>
<u>Heart Hospital (added in 2006)</u>	<u>40-CFR 439</u>	<u>Hospital</u>

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADPC&E OR EPA?

Yes - Applied when the pollutant is suspected of being in the waste stream + perform a pollutant scan for all local limits on an industry when renewing a permit.

2. Describe any apparent problems with the local limits. No problems noted - Facility had local limits certified in Nov. 2001 that the limits were adequate.

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 III of the NPDES permit?

Pollutant:	Frequency:	Permit:	Requirement in Program:	Comments:		
Metals:						
influent	<u>Monthly</u>	<u>1 / Qtr</u>	<u>1 / Qtr</u>	<u> </u>		
effluent	<u>Monthly</u>	<u>1 / Qtr</u>	<u>1 / Qtr</u>	<u> </u>		
sludge	<u>12 / year</u>	<u>-----</u>	<u>-----</u>	<u> </u>		
Organics:						
influent	<u>AR0021806</u> <u>2 / year</u>	<u>AR0040177 /</u> <u>1/yr</u>	<u>AR0021806</u> <u>2 / year</u>	<u>AR0040177 /</u> <u>1/yr</u>	<u>AR0021806</u> <u>2 / year</u>	<u>AR0040177</u> <u>1/yr</u>
effluent	<u>2 / year</u>	<u>1/yr</u>	<u>2 / year</u>	<u>1/yr</u>	<u>2 / year</u>	<u>1/yr</u>
sludge	<u>1 / year (min)</u>	<u>None</u>				

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? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective? No inhibitions since last inspection

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes - permit, Sewer Use Ordinance, & Pretreatment Ordinance.
2. How many IU permits (or other control documents) have been issued? 55, according to LRWU IU Summary
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.** Yes

4. Does the control document contain the following items?

An expiration date Yes

Discharge limitations Yes

If the program requires self-monitoring by the IUs, do the permits contain

IU self-monitoring requirements Yes

IU reporting requirements Yes

5. Indicate which of the following recommended standard conditions are contained in the control documents:

sample location Yes

type of sample Yes

monitoring frequency Yes

bypass prohibition Yes

right of entry Yes

nontransferability Yes

revocation clause Yes

penalty provisions Yes

slug load notification Yes

notification of process change Yes

D. MONITORING OF IUS BY POTW

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

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>> 1/yr/parameter</u>	<u>1/yr/parameter</u>
other SIUs	<u>> 2/yr/parameter</u>	<u>2/yr/parameter</u>
Inspection:		
categorical IUs	<u>> 1 / yr</u>	<u>1 / yr</u>
other SIUs	<u>> 1 / yr</u>	<u>1 / yr</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?**

yes

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:

Date and time of inspection Yes

Officials present Yes

Inspection of chemical storage areas Yes

Description of regulated processes, categorical wastestreams, and discharge location of these wastestreams Yes, discharge location is in the permit

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. Overall adequacy of inspection documentation: The overall adequacy of the inspection forms was sufficient to document the permit requirements

7. **DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).** 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 - access to private labs
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? Reports received by Industrial Techs. then sorted depending upon the data type and weather or not violations occurred. Non-violation reports are forwarded to Susan, then Jeff then are filed. Violations are received by Jeff (after a violation report is filled out) for enforcement procedures and eventually filed.
15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?** Yes - Use the Industrial User Self-Monitoring Evaluation Form
16. **IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?** Yes - A violation report is generated for every violation that occurs.

17. What are the POTW's procedures for following up violations? Phone call to IU, written notification or additional sampling. NOV followed by a Compliance schedule and lastly penalties would be issued or services terminated. Violation reports document each step. Site visits may also be performed.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?

Yes

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address Yes

Other environmental permits held Yes

Description of operations Yes

Process flow diagrams Yes

Flow measurements Yes

Measurements of regulated pollutants Yes

Certification of compliance by the IU Yes

Compliance schedule (if needed) Yes

19. Additional comments on the POTW's inspection and sampling procedures: The facility's inspection and sampling procedures were found to be adequate and appear to be very efficient.

E. ENFORCEMENT

1. **HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS?** Yes, they have followed the plan that's yet to be approved by ADEQ

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

Effluent limitations Daily max violations - telephone call , Chronic or TRC violations - NOV

Late reports Telephone call followed by the option to issue a NOV if late reports are frequent

Unpermitted discharges Telephone call, require facility to comply with the City Sewer Ordinance, certified letter with permit application enclosed

Slug loads or spills Telephone call, NOV sent, show cause hearing. Site visit.

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

4. List the SIUs which have met the criteria for Significant Violator 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:
<u>Dassault Falcon Jet</u>	<u>Cr,Ni,Cd excursions</u>	<u>NOV</u>	<u>In compliance</u>

5 .Comments on the POTW's enforcement procedures: The facility's ERP is being properly followed. All SIU's are currently in compliance except Odom's Tennessee Pride which is in the process of NOV for unpermitted discharge of solids to the collection system.

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 - added 1 industrial inspector
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: Two Pine and Jefferson Co.
Landfills / special permit for leachate
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area?
With a permit and routine sampling
3. Does the POTW have copies of permits for IUs in user cities? NA
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? NA
5. Comments on multijurisdictional issues: No IU's are located in the areas outside of Little Rock that are served by LRWU

H. EVALUATION AND COMMENTS

The following files were reviewed: Ace Plating Works, Wheatland Tube, Odom's Tennessee Pride Sausage, and Diamond Bear Brewery. No problems were found during the file review.

IU Site Visits were conducted at Odom's Tennessee Pride Sausage, Diamond Bear Brewery, and Ace Plating. See attached IU reports for details.

It was found that the Pretreatment Program is implemented by a knowledgeable, well organized, courteous, and seasoned staff.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Ace Plating Works (Facility Closed)

POTW Name: City of Little Rock - Adams Field

Industry Contacts: N/A

Date and Time of Visit: April 7, 2006 @ 1245

Description of Manufacturing Process: _____

Sources of Process Wastewater: N/A

Categorical Industry? N/A

Basis for Limits: N/A

Point of Application: N/A

Description of Pretreatment Equipment and Procedures: N/A

Spill Prevention and Solvent Management Procedures: N/A

Sampling Location and Equipment: N/A

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Odom's Tennessee Pride Sausage

POTW Name: City of Little Rock - Adams Field

Industry Contacts: Jim McConnell - Plant Manager

Date and Time of Visit: April 7, 2006 @ 0840

Description of Manufacturing Process: Manufacturer of Sausage Patties and Links

Sources of Process Wastewater: Blood and facilities washwater

Categorical Industry? no

Basis for Limits: N/A

Point of Application: End of process

Description of Pretreatment Equipment and Procedures: Floor Bar Screens - Rotary Bar Screen - EQ Basin -
Secondary Rotary Bar Screen - DAF Treatment System - All Solids are hauled for rendering

Spill Prevention and Solvent Management Procedures: Burns

Sampling Location and Equipment: sample locations are located outside the plant prior to entering the sewer
main

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Diamond Bear Brewery

POTW Name: City of Little Rock - Adams Field

Industry Contacts: Charlie Kling – Brew Master

Date and Time of Visit: April 7, 2006 @ 1145

Description of Manufacturing Process: Manufacturer of Beer and Root Beer

Sources of Process Wastewater: Washwater and spilled beer

Categorical Industry? no

Basis for Limits: N/A

Point of Application: End of process

Description of Pretreatment Equipment and Procedures: Floor Bar Screens

Spill Prevention and Solvent Management Procedures: N/A

Sampling Location and Equipment: sample location is located in the middle of the Brewery

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

	CODE
INSPECTOR'S NAME <u>Zachary Watson</u>	
NAME OF FACILITY <u>Little Rock Wastewater Utility</u>	
PERMIT NUMBER USED TO TRACK PROGRAM <u>AR0021806</u>	NPID
DATE OF PCI <u>April 6-7, 2006</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS) <u>38</u>	SIUS
NUMBER OF CATEGORICAL IUS <u>17</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW <u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM <u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING <u>1</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS <u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW <u>0</u>	SNIN

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Ace Plating Works (Facility Closed)

Industry Contacts: James Bowdoin


Type of Industry: Job Shop - electroless plating and electroplating

Date of Visit: April 7, 2006 @ 1245

- | | | | |
|---|------------------------------|--|---|
| 1. Significant industrial user: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 6. Solvent management/TTO control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 7. Suitable sampling location? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures/equipment? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 9. Adequate spill prevention? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 10. Industry familiar with limits and requirements? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |

Additional Comments: Facility is no longer in operation.

Visit Conducted By: Zachary Watson / Eric Fleming / Lisa Jacobs Date: April 7 2006



POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Diamond Bear Brewing Company

Industry Contacts: Charlie Kling

Type of Industry: Beer and Root Beer Brewery

Date and Time of Visit: April 7, 2006 @ 1145

- | | | | |
|--|---|--|---|
| 1. Significant industrial user: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6. Solvent management/TTO control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 7. Suitable sampling location? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures / equipment? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 9. Adequate spill prevention? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 10. Industry familiar with limits and requirements? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

Additional Comments: The IU is a non-significant industrial user. The CA has made an agreement with the IU, allowing the IU to decide by August 2006 whether or not they are going to relocate or stay at the current facility. If the brewery remains at the same location, they will have to redesign their plumbing to allow for a more representative sample. Currently, the keg cleaning water is not flowing to the same drain where the sample is collected. Spent grain is hauled off for cattle feed. Diamond Bear produces approximately 120 barrels of product a month. Industrial wastewater generation include discharges from cleaning of production vessels, product containers, sanitizing, cooling water and boiler condensate. No problems were noted during this inspection.

Visit Conducted By: Eric Fleming/ Zac Watson/ Lisa Jacobs Date: April 7, 2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 A R 0 0 2 1 8 0 6 11 12 0 6 0 4 0 7 17 18 I 19 S 20 2					
Remarks					
0 0 3 C					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 69	70 N	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Odom's Tennessee Pride – located at 4701 Asher Avenue in Little Rock, Arkansas (Adams Field - AR0021806)	Entry Time /Date 0840 on 4-7-06	Permit Effective Date October 1, 2001
	Exit Time/Date 1035 on 4-7-06	Permit Expiration Date September 30, 2006

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Brett Smith – Facilities / Maintenance Manager / 501-568-7660
Jeffery Stott – Refrigeration Supervisor / 501-568-7660

Other Facility Data

CIU

Name, Address of Responsible Official/Title/Phone and Fax Number

Jim McConnell – Plant Manager / 501-568-7660
4701 Asher Avenue
Little Rock, AR 72204

Contacted
Yes X No

Section C: Areas Evaluated During Inspection

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

Permit	Flow Measurement	Operations & Maintenance	Sampling
Records/Reports	Self-Monitoring Program	Sludge Handling/Disposal	Y Pollution Prevention
Facility Site Review	Compliance Schedules	Y Pretreatment	Multimedia
Effluent/Receiving Waters	Laboratory	Storm Water	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This facility is a non categorical significant user based upon the volume of discharge into the POTW. Most of the process water generated comes from various washing/cleaning operations. Approximately 700 sows are brought to the facility per day. They are penned and washed onsite, generating a discharge of pen washing material. This process wastewater is pumped from a holding tank and does NOT enter the pretreatment system. The sows are then butchered and processed onsite. Sausage patties are the main product. These patties are also cooked onsite. During our site visit we found that the main rotary screen was not operational at this time. We also found that a hydraulic oil leak has occurred outside, on a concrete pad, near the north end of the hog pen. If a rain event occurs, this waste oil will flow offsite. We noted that in the pretreatment building, several large bulk tanks of sulfuric acid and sodium hydroxide are being used in the treatment process. There is a large concrete berm around the bottom of the building. This acts as the facility containment system. A large door is present on the west end of the building. There is not a berm in this area, and any spills or leaks will discharge from the building. We also noted that the facility effluent flow meter was reading 274.0 gpm. A manual flow measurement was performed and revealed that 155.7 gpm were being discharged, an error of +43.2 %. The last certified meter calibration was 3/21/05. Several storm water problems were noted at this time.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Eric M. Fleming /	ADEQ / Little Rock / (501) 682-0659 / 682-0910	April 7, 2006
Zac Watson & Lisa Jacobs /	ADEQ / Little Rock	April 7, 2006
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Odom's Tennessee Pride

Industry Contacts: Brett Smith – Facilities / Maintenance Manager / 501-568-7660

Jeffery Stott – Refrigeration Supervisor / 501-568-7660

Type of Industry: Slaughterhouse, meat packing facility

Date and time of Visit: 4-7-06 @ 0845

- | | | | |
|--|---|--|---|
| 1. Significant industrial user: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> Not Determined |
| 2. Pretreatment equipment or procedures? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 3. Pretreatment equipment maintained and operational? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 4. Hazardous waste generated or stored? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |
| 5. Proper solid waste disposal? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6. Solvent management/TTO control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 7. Suitable sampling location? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8. Appropriate self-monitoring procedures / equipment? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 9. Adequate spill prevention? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 10. Industry familiar with limits and requirements? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> N/A |

Additional Comments: This facility is a non categorical significant user based upon the volume of discharge into the POTW. Most of the process water generated comes from various washing/cleaning operations. Approximately 700 sows are brought to the facility per day. They are penned and washed onsite, generating a discharge of pen washing material. This process wastewater is pumped from a holding tank and does NOT enter the pretreatment system. The sows are then butchered and processed onsite. Sausage patties are the main product. These patties are also cooked onsite. During our site visit we found that the main rotary screen was not operational at this time. We also found that a hydraulic oil leak has occurred outside, on a concrete pad, near the north end of the hog pen. If a rain event occurs, this waste oil will flow offsite. We noted that in the pretreatment building, several large bulk tanks of sulfuric acid and sodium hydroxide are being used in the treatment process. There is a large concrete berm around the bottom of the building. This acts as the facility containment system. A large door is present on the west end of the building. There is not a berm in this area, and any spills or leaks will discharge from the building. We also noted that the facility effluent flow meter was reading 274.0 gpm. A manual flow measurement was performed and revealed that 155.7 gpm were being discharged, an error of +43.2 %. The last certified meter calibration was 3/21/05. Several storm water problems were noted at this time.

Visit Conducted By: Eric M. Fleming  Date: 4-7-06