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January 18, 2013

HAND DELIVERED

Allen Gilliam, ADEQ Pretreatment Coordinator
Arkansas Department of Environmental Quality
NPDES Enforcement Section
5301 Northshore Drive
North Little Rock, AR 72118

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JAN 18 2013
KN KLL

Adequate
No further action
deemed necessary.
AE

RE: LRW's Response to Pretreatment Audit Report Dated December 20, 2012
(NPDES #AR0021806, #AR0040177 and #AR0050849)

Gentlemen:

Little Rock Wastewater (LRW) is responding, as required, to the Requirements and Recommendations provided by Mr. Allen Gilliam, ADEQ NPDES Pretreatment Coordinator, in a letter dated December 20, 2012 concerning the Pretreatment Audit performed November 13th through the 15th, 2012. Attached is a table that lists the requirements and recommendations and LRW's response to each. If there are any questions concerning these submittals, please feel free to contact Jeff Davis at (501) 688-1495, or Stanley Suel at (501) 688-1486.

Sincerely,

LITTLE ROCK WASTEWATER

Signature

1-18-2013
Date

Reggie A. Corbitt, P.E.
Chief Executive Officer
(501) 376-2903

Walter B. Collins, P.E.
Fourche Creek Superintendent
(501) 490-5402

Stanley Miller
Manager of Operations
(501) 688-1483

Eric L Wassell
Little Maumelle Superintendent
(501) 688-1582

Attachment

cc: Stanley Suel, EAD Director
Jeff Davis, Pretreatment Program Supervisor

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JAN 23 2013
By 10538 H

ATTACHMENT 1

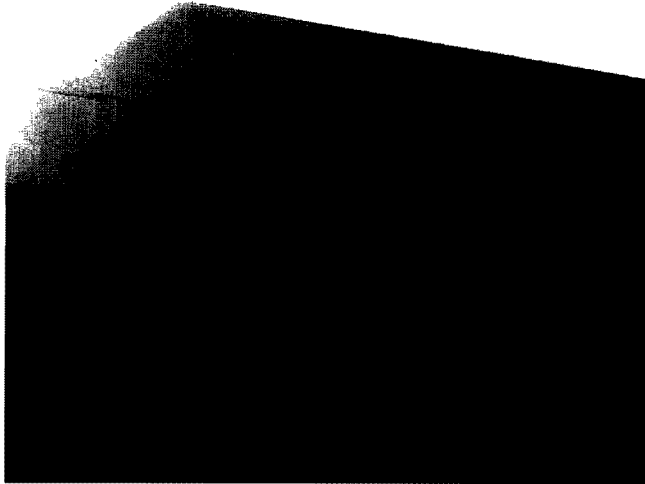
LITTLE ROCK WASTEWATER (LRW) ACTION PLAN RESPONSES TO ALLEN GILLIAM'S PRETREATMENT AUDIT ASSESSMENT (11/13/2012)		
Item No.	Comments Taken From Allen Gilliam's Letter 12/20/12	LRW's Resolution Statements- Response due 1/20/13
Summary of Findings with Required Actions		
1	<p>Under <i>40 CFR 403.5(b)</i> "Specific prohibitions. In addition, the following pollutants shall not be introduced into a POTW: (8) Any trucked or hauled pollutants, except at discharge points designated by the POTW."</p> <p>During the file review, LRW's "Guidelines for Liquid Waste Disposal at the AFTP Disposal Station" (Atch. A-3) a specific discharge point could not be located, only the "Adams Field Disposal Station". If this "Station" is adequately directed to and identified by signage, this "deficiency" may be disregarded.</p>	<p>LRW allows hauled domestic septic tank waste disposal at a designated site at the Adams Field Treatment Plant. This discharge point is adequately directed to and identified by signage. The Plant entrance gate is closed and access can only be gained by LRW personnel. However, LRW will take this opportunity to add new signage to the front gate requiring the haulers to contact plant operations staff to request permission to enter the facility. In addition, LRW will post a new "Disposal Station" sign(s) at the dump pit.</p> <p>Photographs of the current and new signs are on Page 3 of 3 of this Attachment.</p>
Summary of Findings with Recommended Actions		
1	<p>Recommend updating the City's "Technically Based Local Limits Development Document" (last revision submitted on 11/17/98) to reflect the current conditions such as the addition of the Little Maumelle POTW and the UV disinfection at Adams Field for example.</p> <p>Industry make up in that document is outdated as well.</p>	<p>In 2012, in accordance with NPDES Permit requirements, LRW provided ADEQ an "Engineering Certification" stating current Technically Based Local Limits (TBLL) are adequate to protect the elements of the POTW and its receiving stream. If the State has any significantly changed data on the POTW receiving streams Water Quality Standards that would warrant this recommendation please provide this information to LRW staff. LRW agrees the industry make up has changed since the initial TBLL development but only as a reduced loading of some Local Limit pollutants. LRW will continue to track data on the treatment plant processes and industrial user contributions.</p>
2	<p>Recommend tailoring IU surveys to fit industry/business sectors. A survey with questions to machine shops would obviously not apply to screen printer or dentist offices.</p>	<p>The Industrial User Survey Form used by LRW is mailed out to the list of industries/businesses identified through the review of survey sources as possibly subject to pretreatment program requirements. This form requests some basic information (presence of process wastewater discharge of any kind) to enable LRW to take any additional steps if needed. If there is EPA guidance on industry/business sector type Survey Forms please supply links to this information.</p>
3	<p>Recommend developing a separate (from the permits) fact sheet per SIU. This should be kept up-to-date with revision dates noted on the document. Attached is EPA's latest guidance for your review and possible use. The actual start-up/first discharge date should also be noted.</p>	<p>The current SIU "Permit Folders Files" serves as a separate inter office fact sheet. This file includes all required documents and has a cover sheet listing the dates and location of these documents. LRW will add the startup date to the Permit Folder File and include the startup date in the current Permit Fact Sheet when applicable.</p>
4	<p>Consider removing the priority pollutant scan (PPS) from the reporting requirements for the Little Rock landfill's leachate. Most parameters historically showed non-detect. In lieu of the entire PSS being required to report for, surrogate parameters could be substituted that may indicate some change has occurred in the landfills leachate. The City could then require the entire PPS to be sampled and analyzed again to see what pollutants might have increased to cause the surrogate's sudden change.</p>	<p>The Little Rock Landfill's permit monitoring requirements are "two per year" for local limit metals, conventional pollutants, and organic pollutants - volatiles and pesticides only. At this time LRW believes these are adequate minimum effluent limits for the landfill leachate.</p>
5	<p>Recommend permitting all liquid waste haulers. Include the general and specific prohibitions in 40 CFR 403.5(a)(1) and (b) as well as a statement of applicable civil and criminal penalties per 40 CFR 403.8(f)(1)(B)(5).</p>	<p>The Septic Tank Haulers that have been approved to haul domestic septic tank waste to the LRW POTW must abide by the Guidelines for Liquid Waste Disposal at the AFTP Disposal Station. These guidelines require the use of a manifest system and include management practices and restrictions (Pretreatment Ordinance No. 19,895 specifically Section 2.1 Prohibited Discharge Standards) on the septic tank waste accepted. For non domestic wastewater haulers, Special Wastewater Discharge Permits or Restricted Short Term Authorizations are required and include the items of 403.5 and 403.8.</p>

ATTACHMENT 1

LITTLE ROCK WASTEWATER (LRW) ACTION PLAN RESPONSES TO ALLEN GILLIAM'S PRETREATMENT AUDIT ASSESSMENT (11/13/2012)		
6	<p>Recommend including information on the LRW's website regarding proper disposal of pharmaceuticals. The State's Drug Director's website could also be included to help Little Rock residents find their nearest "take-back" sites at http://www.artakeback.org/.</p>	<p>The LRW website has possible locations to post this information: Customer Service/FAQ page, Community Awareness/LR Programs page, or Education/Pollution Prevention page. LRW may post something similar to:</p> <p>Pharmaceuticals and the Sanitary Sewer</p> <p>City of Little Rock Ordinance No. 19, 895 Section 2.1.B(14) states: medical wastes, discharge of "any pharmaceutical medications, prescription or 'over the counter', unused or expired; is a prohibited discharge to the sanitary sewer. The following link offers directions to disposal stations for unused or expired pharmaceuticals: www.artakeback.org</p>
Summary of Required Program Modifications		
	<p>None</p> <p align="center">*****</p> <p>The City should consider the recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval.</p>	<p>Actions/response to the Audit Report will not require substantial modifications to the Pretreatment Program and ordinance.</p>

ATTACHMENT 1

Current Signage



New Front Gate Signage



New Disposal Station Signage- pending

