



**DIVISION OF
ENVIRONMENTAL
QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

03/06/2025

Mr. Michael Clayton, Director
North Little Rock Wastewater Utility
P.O. Box 17898 7400 Baucum Pike
North Little Rock, AR 72117
mclayton@nlrwu.com

RE: NLRWU Inspection – PDS# 132789
AFIN: 60-00274 Permit No.: AR0020303

Dear Mr. Clayton:

On 01/08/2025, I performed a Pretreatment Compliance Inspection of the above referenced 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. A copy of the inspection report is enclosed for your records.

No violations were noted during the inspection. If I can be of any assistance, please contact me at Jason.Bolenbaugh@arkansas.gov or (501) 682-0659.

Sincerely,

A handwritten signature in blue ink that reads "Jason Bolenbaugh".

Jason Bolenbaugh
Compliance Branch Manager, Office of Water Quality

CC: Marybeth Eggleston, Env. Supervisor, NLRWU, MEggleston@nlrwu.com
Mitch Foreman, Pretreatment Coord., NLRWU, MForeman@nlrwu.com

 ENVIRONMENTAL QUALITY		OFFICE OF WATER QUALITY INSPECTION REPORT				
		AFIN: 60-00274		PERMIT #: AR0020303		DATE: 1/8/2025
		COUNTY: 60 Pulaski		PDS #: 132789		MEDIA: WN
		GPS LAT: 34.7390 LONG: -92.1799 LOCATION: Entrance				
FACILITY INFORMATION			INSPECTION INFORMATION			
NAME: NLRWU LOCATION: 7400 Baucum Pike CITY: North Little Rock			FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 83321 S - State FACILITY EVALUATION RATING: 4 - Satisfactory INSPECTION TYPE: Pretreatment Compliance DATE(S): 1/8/2025 ENTRY TIME: 09:00 EXIT TIME: 11:00 PERMIT EFFECTIVE DATE: 6/1/2019 2/27/2025 ENTRY TIME: 09:00 EXIT TIME: 10:30 PERMIT EXPIRATION DATE: 5/31/2024			
RESPONSIBLE OFFICIAL			FAYETTEVILLE SHALE RELATED: N			
NAME / TITLE: Mr. Michael Clayton / Director COMPANY: North Little Rock Wastewater Utility MAILING ADDRESS: P.O. Box 17898 7400 Baucum Pike CITY, STATE, ZIP: North Little Rock AR 72117 PHONE & EXT: / FAX: 501-945-1786 133 / EMAIL: mclayton@nlrwu.com			FAYETTEVILLE SHALE VIOLATIONS: N			
CONTACTED DURING INSPECTION: No			INSPECTION PARTICIPANTS			
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Marybeth Eggleston, Env. Supervisor, NLRWU Mitch Foreman, Pretreatment Coord., NLRWU Alan Anderson, Pretreatment Coord., DEQ-OWQ Gracie Morrison, Water Quality Specialist, DEQ-OWQ			
AREA EVALUATIONS						
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)						
**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER	
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW	
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM	
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT	
**	OTHER:					

SUMMARY OF FINDINGS

No violations were noted during the inspection. Discussions were held with Mr. Foreman regarding monitoring of all the Industrial Users (IU) according to 40 CFR 403.8(f)(2)(v). North Little Rock Wastewater Utility (NLRWU) conducts all sampling of the IUs and secures those samples until a contract lab assumes responsibility. All sampling is independent of the IUs. Therefore, it was agreed that NLRWU is adhering to the requirements of the 40 CFR 403.8(f)(2)(v).

GENERAL COMMENTS

The Pretreatment Compliance Inspection (PCI) tracks industrial user discharges for the NLRWU wastewater treatment plants at Faulkner Lake (AR0020303), Five Mile Creek (AR0020320), Maumelle Water Management (AR0033626), and White Oak Bayou (AR0038288).

NLRWU Pretreatment team consists of Ms. Eggleston, Mr. Foreman, two technicians, and one pretreatment clerk. The technicians daily route consists of visiting each IU. The technicians monitor pH and temperature at each IU daily and collect two samples per month while the IU collects one.

On February 27, 2025, IU inspections of Blue Beacon of Little Rock and JB Hunt Transport were completed. Both facilities are considered non-categorical Significant Industrial Users. No violations were noted at either facility.

INSPECTOR'S SIGNATURE:	←Click text to left to add signature	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE:		Jason Bolenbaugh	DATE: 3/5/2025

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. The last Pretreatment Compliance Inspection was conducted on January 26, 2021. Tyson Foods Inc. (Noncategorical) was removed in 2024.	
2. Has ADEQ or EPA been notified of these changes? Yes	
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes	
4. What procedures are being used to update the IU Survey? A new facility will initially submit a waste survey before submitting an application for a permit. NLRWU can determine whether or not the IU needs to submit an application based on the waste survey. Permitted facilities submit a renewal permit application that is more comprehensive than a waste survey. Permits are issued on a four-year term.	
5. Total number of Significant Industrial Users, according to the definition used by the POTW: 18	
6. Number of Categorical Industrial Users: 4	
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Based on the waste survey, permit application, and 40 CFR regulations.	
8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU and the regulatory category (i.e. Metal Finishing).	
Name of IU:	Category:
Caterpillar	40 CFR 433 - Metal Finishing
Kopper Industries	40 CFR 429 - Timber Products Processing
Molex LLC.	40 CFR 433.17 - Metal Finishing
Safe Foods	40 CFR 414 (SP. K) - Organic Chemicals, Plastics, and Synthetic Fibers
B. LOCAL LIMITS	
1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, local limits for BOD and TSS.	
2. Describe any apparent problems with the local limits. The local limits were revised in 2016 where the limits were increased. If a facility exceeds 250 mg/l BOD they are surcharged by NLRWU. NLRWU has not experienced any problems with the local limits.	

3. How often are pollutant scans of POTW influent and effluent performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and Part II.8.C of the permit?

Pollutant:		Sampling Frequency		Permit Requirement		Program Requirement
Metals:						
Influent:		Quarterly		Quarterly		Quarterly
Effluent:		Quarterly		Quarterly		Quarterly
Organics:						
Influent:		Annually		Annually		Annually
Effluent:		Annually		Annually		Annually

Comments: **Reviewed 2021-2023 annual reports and 2021 White Oak Bayou sample analyses.**

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 POTW to ensure that the incident would not recur. Were these actions effective? **No inhibitions or upsets have occurred due to an industrial user discharge.**

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? **A permit serves as the control mechanism.**

2. How many IU permits (or other control documents) have been issued? **All permits have been issued and effective on 9/1/2024. All permits are issued under 4-year terms and have the same expiration date.**

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? List the section of the permit each item is listed under. **Reviewed Koppers Inc. permit effective on September 1, 2024.**

An expiration date: **August 31, 2028**

Discharge limitations: **Section 4**

If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.

IU self-monitoring requirements: **Section 5**

IU reporting requirements: **Section 6**

5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.

Sample location: Section 4 - Wastewater discharge pipe located in the sampling station, a concrete block building on the southwest corner of the complex, north side of the railroad tracks from Atkinson St.			
Type of sample: Section 5 - 24-hour Composites and Grab samples			
Monitoring frequency: Section 5 - the facility will collect metals once in February and once in August.			
Bypass prohibition: Section 3			
Right of entry: Section 5			
Non-transferability: Section 2			
Revocation clause: Section 2			
Penalty Provisions: Section 10			
Slug load notification: Section 3.A			
Notification of process change: Section 2			
D. MONITORING OF IUS BY POTW			
1. Indicate current inspection and sampling frequency and program requirement below.			
	Current frequency:		Program Requirements:
Sampling:			
Categorical IUs	Annually		Annually
Other SIUs	Annually		Annually
Inspection:			
Categorical IUs	Annually		Annually
Other SIUs	Annually		Annually
Comments: Reviewed 2021-2023 annual reports. All IUs were inspected once and sampled more than once by the permittee. Two sampling technicians will sample each IU daily (weekdays) to sample for BOD, TSS, pH and Temperature.			
2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes			
3. Are inspections announced or unannounced? It can be both, but generally the annual inspections are announced because NLRWU wants to maintain a good working relationship with the IUs, and they have not experienced environmental problems that would necessitate unannounced inspections. NLWRU staff sometimes has to coordinate with some of the IUs to ensure the appropriate personnel are on site. NLRWU does visit all of the IUs every weekday.			
4. Are records kept of each inspection? Yes			
5. Does the inspection report contain an adequate description of the following: Reviewed Blue Beacon inspection report (8/15/2024)			
Date and time of inspection: 8/15/2024 @ 0900			
Officials present: Mitch Foreman (Inspector, NLRWU), Rosikeo Mathews (General Manager, Blue Beacon)			
Inspection of chemical storage areas: Yes - Attachment D. The chemical storage area is located to the rear of the mechanical room. Floor drains			

exist but are plugged. The facility maintains spill control kits and established notification procedures.
Description of regulated processes, categorical waste streams, and discharge location of these waste streams: The regulated process is a truck wash facility. Blue Beacon is not a categorical industrial user, and the waste streams to the sanitary sewer consists of pretreated process wastewater and sanitary wastewater.
Inspection of the pretreatment facilities: Yes - Attachment C. Treatment system consists of two bay floor pits connected in series. Each pit has a six-foot depth with built-in separator walls. Pits are cleaned as needed. Soda ash or acid is metered directly into the wash bay to adjust pH.
Review of self-monitoring records: NLRWU conducts all sampling. The inspector noted self-monitoring records are maintained for at least three years.
Observation of IU self-monitoring procedures: NLRWU conducts all sampling. Facility personnel do not perform self-monitoring tests in-house.
Verification that approved analytical techniques are used: Yes, all sample analyses are performed by Environmental Services Company Inc, which is an accredited laboratory.
Verification of IU flow measurement (where required): Flow is measured via incoming flow readings from a CAW meter. There isn't an effluent flow meter.
6. Please describe the overall adequacy of inspection documentation: The inspection record is complete and informative.
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). No, NLRWU only samples for BOD, TSS, O&G, pH, and Temp.
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes
9. Are sampling and flow monitoring equipment properly maintained? NLRWU requires the IU to maintain the samplers, but NLRWU will notify the IU should they experience any issues with the sampler. The NLRWU sampler will help maintain the sampler (e.g. tubing) if the materials are available. The IU is required by the permit to calibrate the flow meters at least every 6 months if they have a discharge flow meter. The IU can decide on how they will measure their flow (influent, effluent).
10. Is the POTW keeping proper field notes and chain of custody forms? Yes. The review of the Blue Beacon Chain-of-Custody from October 3, 2024, revealed it was complete, samples were collected according to the type outlined in the permit, and were properly collected, preserved, and released for analysis.
11. Are sampling locations identified in POTW records? Yes, the sampling

location was noted in the permit and the inspection report.
12. Are sampling services available in an emergency? NLRWU doesn't offer that as a service in which they would charge, but they have the necessary equipment such as a composite sampler that the IU can borrow to collect the required samples.
13. 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? The reports are all placed in the IUs file, and there is an electronic spreadsheet maintained. The spreadsheet will help NLRWU identify records that have not been submitted. All reports are due on the 15th of the following month.
14. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? The DMRs are reviewed by the pretreatment clerk and Mr. Foreman. The DMRs can be submitted electronically or hard copy. Data is entered into a spreadsheet where any effluent violations are flagged.
15. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes, NLRWU will respond to all violations with a phone call or email, and a non-compliance letter.
E. Enforcement
1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? NLRWU had an Enforcement Response Plan (ERP) established in the pretreatment ordinance. NLRWU doesn't anticipate changing any requirements in the ERP. NLRWU believes the ERP is sufficient.
2. How does the POTW respond to the following violations?
Effluent limitations: Phone call/email, non-compliance letter, request a response, could result in a Show-Cause Hearing for continued violations.
Late reports: Phone call/email,
Unpermitted discharges: Phone call/email, non-compliance letter, request a response, could result in a Show-Cause Hearing for continued violations.
Slug loads or spills: A letter is required to be submitted within 5 days.
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)? No SNCs occurred in 2023 or 2024.

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:
None			

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**

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: **NLRWU does not accept any IU discharges from beyond its jurisdiction.**