Appendix B

1997 NPDES Report

NPDES PERMIT ARS000001 1997 ANNUAL REPORT

INTRODUCTION

This annual report is submitted in accordance with NPDES Permit ARS00001, and includes an annual review of the Storm Water Quality Management Program (SWQMP). This report and the SWQMP address pollution prevention requirements and system-wide requirements identified at Permit Part III, and the status of implementing components of the Program. This is the initial annual report required under the Permit, which became effective on January 1, 1997. The SWQMP, modified in accordance with Permit Part III.G.2 to reflect the appeal resolution of 1996, is attached.

POLLUTION PREVENTION MEASURES

III.A.1: Used Motor Vehicle Fluids Collection

An information brochure on Solid Waste Service was produced, published and distributed to every utility customer during 1996. The total cost of this effort was about \$12,000. The City also has two brochures addressing recycling services and household hazardous waste which were developed prior to 1996, and which are disseminated at community events. These brochures are produced in-house, and no associated cost is identified.

During 1997, Little Rock produced a Public Service Announcement (video) for use by local cable access and television stations which addresses illegal disposal. This video will be available and will be aired periodically during 1997. It is too early to include the costs of this effort in the initial annual report.

III.A.2: Household Hazardous Waste Collection

Little Rock participated along with the Pulaski County Regional Solid Waste Management District in a household hazardous waste roundup during 1996. There were an estimated 550 people who used the location at War Memorial Stadium to dispose of household hazardous materials, including:

- 33,695 pounds of paint and related materials;
- 1,226 pounds of poisons and chemicals;
- 6,994 pounds of insecticides, herbicides and fertilizers;
- 958 pounds of batteries; and,
- 400 tires.

Advertising was facilitated by radio, newspaper, utility bills, television news and the cable access channel for a advertising cost of \$5,816.11. The total cost of the collection event was \$47,817.50.

A household hazardous waste roundup has not been scheduled for 1997. Little Rock is coordinating with the Solid Waste District on a 1997 collection activity.

III.A.3: Floatables Reduction

Little Rock produced two Public Service Announcements addressing recycling and proper disposal in late 1996 and early 1997, in addition to the illegal disposal PSA previously identified. These PSA's have appeared or will appear shortly on local television and cable access channels, and will be reported in the next annual report.

SYSTEM-WIDE MEASURES

III.B.1: Operation and Maintenance of Structural Controls

Minor repairs to catch basins, pipes and culverts is an ongoing O&M activity for both copermittees. Little Rock repaired 163 catch basin covers and repaired 612 linear feet of storm sewer during 1996 for a total cost of \$51,926. The City maintained 40,433 feet of driveway and road culvert for a total cost of \$86637. The Highway Department spent \$41,739 for minor cleaning, maintenance and repairs within the municipal limits.

Ditch maintenance pulling, shoulder repair and hand-cleaning accounted for 295,195 linear feet of ditch and cost Little Rock \$340,406 during 1996. The Highway Department reports ditch cleaning and re-shaping accounted for \$29,337 in costs on State routes within the city during this reporting period.

In addition, the City in 1996 performed major ditch cleaning, including back-hoe and vac-all ditching, on a total of 198,126 feet of ditch for a cost of \$168,640. Capital Drainage Improvements accounted for \$162,710 in costs.

The Coleman Creek Restoration Project has not yet been initiated by the City, as evident by inspection during February of 1997. The restoration of the water quality ponds is planned during the later months of the year, when weather conditions are optimum.

III.B.2: New Development Controls

Stormwater Management, Development Control and Drainage Management programs accounted for \$324,353 in City funds during 1996. Among other activities, the Public Works Department reviewed 7 NPDES facility permits, approved 36 plans for construction

of new subdivisions or boundary street widening, performed 170 building permit reviews, 303 Planning Commission and Board of Adjustment reviews, approved 85 preliminary and final plats, issued 35 development permits for floodplains, made 247 floodplain determinations, issued 60 excavation permits and reviewed a total of 594 plans for excavation and floodplain regulations.

III.B.3: Roadways

Sweeping records through November of 1996 indicate the City swept 24,251 curb miles of roadways on which curbs and barrier walls are provided. This generated 8,282 cubic yards of debris, which was disposed of at the landfill. The cost of sweeping and disposal to the City during 1996 was \$341,747. The Highway Department removed 4,912 cubic yards of debris from State routes within the City for a cost of \$104,518.

Little Rock's "Adopt-A-Street" Program during 1996 accounted for 69.1 miles of streets being adopted and cleaned by citizens and citizen groups. No estimate of the debris removed by voluntary workers was made, and no cost was identified for this program element. The Highway Department removed 832 cubic yards of litter with their own staff, and contracted for litter pickup that is estimated to have removed another 841 cubic yards of litter from roadways. The Highway Department spent \$116,186 on their anti-letter effort.

III.B.4: Flood Control Projects

No flood control projects requiring water quality certification were reviewed during 1996.

III.B.5: Pesticides, Herbicides and Fertilizers

During 1996, the Highway Department reported 18 State Plant Board-certified applicators of pesticides, herbicides and fertilizers. Little Rock Public Works has two foremen who are Board-certified.

Little Rock amended its Standard Contract and Documents to reflect that all commercial applicators of pesticides, herbicides or fertilizers must be licensed by the State Plant Board.

III.B.6: Illicit Discharges and Improper Disposal

Little Rock spent \$11,996 on illegal dump clean-up during 1996. Services requests, citizen complaints and emergency cleaning activities were performed at 2,348 locations for a total cost of \$76,920.

Dry-weather screening will not commence until dry weather, and thus will be reported in the next annual report. Public Works has added an engineering specialist to existing staff to facilitate both reporting and investigations of illicit discharges and improper disposal.

III.B.7: Spill Prevention, Containment and Response

No incident reports were received by Public Works during the effective permit period. The Highway Department reports no incidents during this reporting period.

III.B.8: Industrial and High-Risk Runoff

Little Rock has identified approximately 350 facilities which might be required to obtain NPDES permit coverage within the City, and developed a database of these facilities.

III.B.9: Construction Site Runoff

Little Rock issued 60 excavation permits during 1996. Public Works began to require soil loss calculations in August, which identified a potential soil loss reduction of 2,277 tons from construction sites occupying 67.1 acres. The City estimates that this is equivalent to a maximum of 6764 cubic yards of sediment which was prevented from entering the municipal storm sewer system as a result of these controls.

III.B.10: Public Education Programs

No independent public education activities were undertaken in 1996, other than those previously identified under motor vehicle fluids, hazardous materials and floatables reduction programs.

Efforts in 1997 include coordinating with the ADPC&E Water Education Program to investigate a "Stream Teams" program for greater Little Rock. This will be reported further in the next annual report.

REPRESENTATIVE MONITORING

Little Rock contracted for sample collection, analysis and reporting in January of 1997, and obtained first-quarter samples. Discharge Monitoring Reports were completed and submitted to the Department on March 24, 1997.

The Contract laboratory reported one discrepancy between the NPDES Permit and the preprinted Discharge Monitoring Reports, which is now being reconciled by the ADPC&E. Little Rock noted that event information required in the Permit was also not included on the DMR, and reported this to the contract provider. This is also being reconciled with the ADPC&E.