

ADEQ

ARKANSAS
Department of Environmental Quality

January 25, 2010

Mike Lawrence, Plant Manager
City of Rogers Pollution Control Facility
4300 Rainbow Road
Rogers, AR 72758

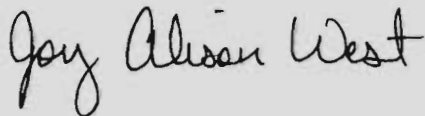
Re: AFIN: 04-00155, Permit No.: AR0043397

Dear Mr. Lawrence:

On December 18 and December 21, 2009, I performed a routine pretreatment compliance inspection of your facility in accordance with the provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated there under. This inspection revealed that you are in compliance with the terms of your permit.

If I can be of any assistance, please contact me at (479)267-0811, ext. 12.

Sincerely,



Alison West
District Field Inspector
Water Division

cc: Water Division Permits Branch

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: City of Rogers

AFIN Number: 04-00155

NPDES Permit Number(s): AR0043397,ARR00C388,ARR152285

Program Tracked under NPDES Permit Number: AR0043397

Fact Sheet Preparation Date: 8-15-06

Date of Last PCI/Audit: December 14, 2006/May 13-15, 2008

Date of Last Annual Report: 1-15-2009

Name of Inspector: Alison West

Date PCI Performed: 12-18-2009, 12-21-09

Name, Title, and Telephone Number of Facility Representative:
Paul Burns/Pretreatment Coordinator/479-273-7378

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: Tyson Foods, Inc.-Tyson of Rogers and
Pel-Freez Rabbit Meat, Inc.

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

**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.**

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. No SIU's have been added or deleted since the last inspection.
2. Has ADEQ or EPA been notified of these changes? NA
3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes
4. What procedures are being used to update the IU Survey? Industry user waste survey forms, industry user questionnaire forms, site visits. The Chamber of Commerce sends a list of new companies. The pretreatment program receives new connections from the Water Department.
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) 12
6. Number of Categorical Industrial Users: 5
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Inspections, site visits, BMRs, industry user survey form, Federal Register 40 CFR, telephone book, ADEQ website.
8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category 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: |
|---------------------|--------------------------------|------------------------------|
| Bekeart | Metal Finishing/Iron and Steel | Plating/Chemical Etching |
| Mafco | Metal Finishing | Coating |
| Preformed Line | Aluminum Forming | Quench, clean and rinse |
| Superior Industries | Metal Finishing | Phosphating/Chemical Etching |
| Kennametal | Non Ferrous Metals | Powder Forming |
| | | |
| | | |
| | | |
| | | |

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? NA

2. Describe any apparent problems with the local limits. NA

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: | Requirement in Permit: | Program: | Comments: |
|------------|--|------------------------|----------|-----------|
| Metals: | | | | |
| Influent: | 5 times a year/4 times on phenol and cyanide | Once/Quarter | NA | NA |
| Effluent: | 5 times a year/4 times on phenol and cyanide | Once/Quarter | NA | NA |
| Sludge: | NA | NA | NA | NA |
| Organics: | | | | |
| Influent: | Once/Year | Once/Year | NA | NA |
| Effluent: | Once/Year | Once/Year | NA | NA |
| Sludge: | NA | NA | NA | NA |

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

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

2. How many IU permits (or other control documents) have been issued? 12

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?
Permits for Tyson of Rogers and Pel-Freez were reviewed.
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: Reviewed only Pel-Freez and Tyson Foods, Inc.-Tyson of Rogers files.

| | Current frequency: | Program Requirement: |
|-----------------|--------------------|----------------------|
| Sampling: | | |
| categorical IUs | <u>1/YR</u> | <u>1/YR</u> |
| other SIUs | <u>1/YR</u> | <u>1/YR</u> |
| Inspection: | | |
| categorical IUs | <u>1/YR</u> | <u>1/YR</u> |
| other SIUs | <u>1/YR</u> | <u>1/YR</u> |

HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY
REQUIRED BY THE APPROVED PROGRAM? Yes, 2009

3. Are inspections announced or unannounced? Announced
4. Are records kept of each inspection? Yes
5. Does the inspection report contain an adequate description of the following: Reviewed Pel-Freez and Tyson Foods, Inc.-Tyson of Rogers files
- Date and time of inspection: Yes
- Officials present: Yes
- Inspection of chemical storage areas: Yes
- Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes
- 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): No, but require IU's to service and calibrate flow devices 1/year.
6. Overall adequacy of inspection documentation: Good

-
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? **Industries should begin to perform calibration checks periodically to verify +/-10% range.**
-
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**
-
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? **All reports, etc are logged in upon receipt, reviewed, and filed. The data is inputted to the computer tracking system.**
-
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? **Yes, by Paul Burns. Information is entered into two programs in the computer. The report is filed in the I.U. file.**
-
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? **Yes**
-
-

17. What are the POTW's procedures for following up violations?

Follows enforcement response plan.

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: No new categoricals since the last inspection.

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: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures: Flow calibration checks should be conducted periodically at the industries to verify flow meter is within the +/-10% range. Tyson Foods of Rogers was not conducting the calibration checks as required by the control document.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, see attachment #1

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

Effluent limitations: See attachment #1.

Late reports: See attachment #1.

Unpermitted discharges: See attachment #1.

Slug loads or spills: See attachment #1.

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 significant violators in 2008.

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>N/A</u> | | | |
| | | | |
| | | | |
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| | | | |
| | | | |

5. Comments on the POTW's enforcement procedures:

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: No

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A

3. Does the POTW have copies of permits for IUs in other cities? N/A

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? N/A

5. Comments on multijurisdictional issues: N/A

H. EVALUATION AND COMMENTS

The facility's documents were well organized. During the inspection at Tyson Foods of Rogers, I was informed that calibration checks are not conducted periodically to verify the flow meter is within +/-10% range.

All industries should conduct and document calibration checks. In addition, the 6.0 buffer expired on June 30, 2009. During the inspection at Pel-Freeze, Inc., the chain of custody was not properly filled out.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Pel-Freeze Arkansas, LLC

POTW Name: City of Rogers

Industry Contacts: Carolyn Wendel

Date and Time of Visit: 8:30-9:45 a.m./12-21-09

Description of Manufacturing Process:

Process rabbits for meat and use animal by-products to produce raw products for biotechnology companies.

Sources of Process Wastewater:

Receiving, Kill/Blood/Skin, Cut/Package, Chill, Brain lab area

Categorical Industry? No

Basis for Limits: N/E

Point of Application: N/E

Description of Pretreatment Equipment and Procedures:

This industry does not have a pretreatment system.

Spill Prevention and Solvent Management Procedures:

Slug control plan and pollution prevention plan in place to prevent occurrences of spills and slugs.

Sampling Location and Equipment:

Monitoring flume is located outside the rabbit holding area along the east wall off of Arkansas Street. There is an Automatic sampler (ISCO GLS) and flow meter (ISCO 4210). The flow meter is calibrated yearly.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Tyson Foods, Inc.-Tyson of Rogers

POTW Name: City of Rogers

Industry Contacts: Wylie Luther

Date and Time of Visit: 10:05 a.m./12-21-09

Description of Manufacturing Process:

Raw chicken is supplied from a first processing facility. The chicken is cooked using a continuous cooker. After the chicken is cooked, it is chilled with once through contact city water in order to cool the cooked chicken to <80°F. Then, it is hand deboned, mechanically chopped, and IQF frozen to less than 20 degrees C. Meat is further removed from bones at grinder area and used to produce a mechanically separated product. Broth is stored, condensed, and processed.

Sources of Process Wastewater:

Chemicals used to disinfect in wash-down wastewater, debone lines, and possibly broth if it is not dewatered to >16% solids
Categorical Industry? No

Basis for Limits: N/E

Point of Application: N/E

Description of Pretreatment Equipment and Procedures:

Nijhuis system is used for pretreatment. The facility ensures that the system is maintained 24 hours/day. All waste streams combine in the process facility. The waste stream flows to a rotary screen where solids are pumped to an offal trailer. River Valley Animal Foods disposes offal waste. From the rotary screen, the waste is pumped to the pretreatment wet well. From the wet well, it is pumped to the #1 DAF. Coagulants are added to remove solids and reduce organics. Then, the waste water is aerated in a 205,000 gallon equalization basin. The waste water enters the #2 DAF after the EQ basin for additional treatment. Solids from both DAF units are pumped to sludge decant tanks and stored in a 10,000 gallon sludge holding tank. TRS is contracted to dispose of the sludge.

Spill Prevention and Solvent Management Procedures:

Slug control plan and pollution prevention plan in place to prevent occurrences of spills and slugs.

Sampling Location and Equipment:

Tyson of Rogers has an ISCO Model 3700 automatic sampler and an
ISCO4230 bubbler flow meter with parshal flume. Facility
Monitors on the northeast side of the pretreatment facility.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

| | | |
|---|---------------------------|------|
| | | CODE |
| INSPECTOR'S NAME: | <u>Alison West</u> | |
| NAME OF FACILITY: | <u>City of Rogers</u> | |
| PERMIT NUMBER USED TO TRACK PROGRAM: | <u>AR0043397</u> | NPID |
| DATE OF PCI: | <u>12-18-09, 12-21-09</u> | DTIA |

PPETS WENDB DATA ELEMENTS

| | | |
|--|-----------|------|
| NUMBER OF SIGNIFICANT IUS (SIUS): | <u>12</u> | SIUS |
| NUMBER OF CATEGORICAL IUS: | <u>5</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>0</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 |



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 | - | - | - | - | - | - | - | - | 11 | 12 | 0 | 9 | 1 | 2 | 2 | 1 | 17 | 18 | I | 19 | S | 20 | 2 | |
| Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 0 | 2 | C | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Inspection Work Days | | | | | | Facility Evaluation Rating | | | | | | BI | | QA | | Reserved | | | | | | | | | | | | |
| 67 | | | | | 69 | 70 | N | | | | | 71 | N | 72 | N | 73 | | | | | 74 | | | | | | | 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) Pel-Freeze Arkansas, LLC 404 North Arkansas St. Rogers, AR | POTW: City of Rogers/AR0043397 | Entry Time /Date 12-21-09 8:30 a.m. | Permit Effective Date N/A |
| | | Exit Time/Date 12-21-09 9:45 a.m. | Permit Expiration Date N/A |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Brenda Crenshaw/QA Manager and Environmental Coordinator/479-636-4361 | | Other Facility Data | |
| Name, Address of Responsible Official/Title/Phone and Fax Number Regina Stowe/Chief Operating Officer/479-636-4361, ext. 302 Pel-Freeze Arkansas, LLC 404 North Arkansas St. Rogers, AR 72756 | | Contacted Yes _____ No <input checked="" type="checkbox"/> X | |

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 | Y | Pretreatment | N | Multimedia |
| N | Effluent/Receiving Waters | N | Laboratory | N | Storm Water | N | Other: |

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

Chain of custody was not properly filled out.

| | | |
|--|---|-----------------|
| Name(s) and Signature(s) of Inspector(s) Alison West <i>Joy Alison West</i> | Agency/Office/Telephone/Fax ADEQ/Fayetteville/(479) 267-0811, ext. 12/(479) 267-0819 | Date 1-20-10 |
| Signature of Management QA Reviewer | Agency/Office/Phone and Fax Numbers | Date |

POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Pel-Freeze Arkansas, LLC

Industry Contacts: Brenda Crenshaw, QA Manager and Environmental Coordinator

Type of Industry: Meat Small Processor

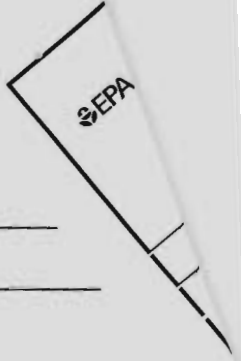
Date of Visit: 12-21-09

- | | | | |
|---|---|--|---|
| 1. significant industrial user: | <input checked="" type="checkbox"/> yes | <input type="checkbox"/> no | <input type="checkbox"/> n/a |
| 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 checked="" type="checkbox"/> no | <input type="checkbox"/> n/a |
| 4. hazardous waste generated or stored? | <input checked="" type="checkbox"/> yes | <input 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 checked="" type="checkbox"/> yes | <input type="checkbox"/> no | <input 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:

Chain of custody was not properly filled out.

Visit Conducted by (signature): Alison West *Joy Alison West* Date: 1-20-10



POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Tyson Foods, Inc., Tyson of Rogers

Industry Contacts: Wylie Luther

Type of Industry: Poultry Further Processing

Date of Visit: 12-21-09

- 1. significant industrial user: X yes no n/a
- 2. pretreatment equipment or procedures? X yes no n/a
- 3. pretreatment equipment maintained and operational? X yes no n/a
- 4. hazardous waste generated or stored? X yes no n/a
- 5. proper solid waste disposal? X yes no n/a
- 6. solvent management/tto control yes no X n/e
- 7. suitable sampling location? X yes no n/a
- 8. appropriate self-monitoring procedures/equipment? yes X no n/a
- 9. adequate spill prevention? X yes no n/a
- 10. industry familiar with limits and requirements? X yes no n/a

Additional Comments:

Flow calibration checks were not being conducted to verify meter was within +/-10% range. 6.0 buffer expired on June 30, 2009.

Visit Conducted by (signature): Alison West *Alison West* Date: 1-20-10