



ARKANSAS
Department of Environmental Quality

June 25, 2012

Robert Moore, Plant Manager
City of Rogers
4300 Rainbow Road
Rogers, AR 72756

AFIN: 04-00155, NPDES Permit Nos: AR0043397 and ARR00C388 (No Exposure), Routine Compliance Inspection

Dear Mr. Moore

On May 21, 2012, I performed a routine 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. The inspection also included an evaluation of the “no exposure” certification submitted by the City of Rogers under NPDES Permit ARR00C388. The inspection revealed the following:

NPDES Permit AR0043397, Compliance Evaluation Inspection

1. Dissolved oxygen records did not include: the sampler, the time sampled, and the date sampled. This is in violation of Part II, Section C, 8a and 8b of your permit.
2. Duplicate samples are not analyzed on at least 10% of the dissolved oxygen samples. This is in violation of Part 2, C, 3 of your permit.

Calibration records for the dissolved oxygen meter document the date and time of the calibrations and the name of the person performing the calibrations. It is recommended that the results of the calibrations be recorded to show that steps H and I of your SOP are being noted. In addition, any maintenance of the dissolved oxygen meter needs to be recorded in a log.

NPDES Permit AR0043397, Pretreatment Compliance Inspection

The inspection revealed the City of Rogers is in compliance with the terms of your permit.

NPDES Permit ARR00C388 (No Exposure)

The inspection revealed the City of Rogers is in compliance with the “no exposure” certification for this facility.

Mr. Moore, Rogers Pollution Control Facility

June 25, 2012

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The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of the first page of the letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. photos) is due by July 6, 2012.

If I can be any assistance, please contact me at west@adeq.state.ar.us or 479-267-0811, ext. 12.

Sincerely,

A handwritten signature in black ink that reads "Jay Alison West". The signature is written in a cursive, flowing style.

Alison West
District 1 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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 4 3 3 9 7 11 12 1 2 0 5 2 2 17 18 P 19 S 20 1					
Remarks					
A F I N 0 4 - 0 0 1 5 5					
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 (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) City of Rogers 4300 Rainbow Road Rogers, AR 72756	Entry Time/Date 9:00 a.m./5-22-2012 8:15 a.m./5-23-2012	Permit Effective Date 3/1/2006
	Exit Time/Date 4:30 p.m./5-22-2012 1:25 p.m./5-23-2012	Permit Expiration Date 2/28/2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Paul Burns/Pretreatment Coordinator/479-273-7378	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Robert Moore/Plant Manager City of Rogers 4300 Rainbow Road Rogers, AR 72756 479-273-7378	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

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

N	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		Other:

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

The pretreatment program was rated satisfactory and appears to be operating according to the terms of the permit.

Name(s) and Signature(s) of Inspector(s) Alison West <i>Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality- Fayetteville (479)267-0811, Ext. 12/(479) 267-0819 (Fax)	Date June 21, 2012
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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, AR0043397C, ARR00C388

Program Tracked under NPDES Permit Number: AR0043397

Fact Sheet Preparation Date: 8-15-06

Date of Last PCI/Audit: December 18 & 21, 2009/June 13-15, 2011

Date of Last Annual Report: January 27, 2012

Name of Inspector: Alison West

Date PCI Performed: May 22 & 23, 2012

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: Preformed Line Products Company, Glad
Manufacturing Company

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. Southeast Poultry was added to the program October 2010. Strateline was deleted from the program May 2010.
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? Industry user waste survey forms, site visits, Chamber of Commerce business listing, permit reapplication requirements, review of water billing records, review of phone book.
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: 6
7. How does the POTW determine the appropriate categorical standards to apply to an IU? Site inspections, 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	Electroplating/ Coating
Mafco	Metal Finishing	Coating
Preformed Line	Aluminum Forming	Cleaning bath and rinse
Superior Industries	Metal Finishing	Coating
Kenametal	Non Ferrous Metals Forming and Metal Powders	Refractory Metals 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:	Requirement in Program:	Comments:
Metals:				
Influent:	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>NA</u>	<u>NA</u>
Effluent:	<u>1/Qtr</u>	<u>1/Qtr</u>	<u>NA</u>	<u>NA</u>
Sludge:	<u>NE</u>	<u>NE</u>	<u>NA</u>	<u>NA</u>
Organics:				
Influent:	<u>1/YR</u>	<u>1/YR</u>	<u>NA</u>	<u>NA</u>
Effluent:	<u>1/YR</u>	<u>1/YR</u>	<u>NA</u>	<u>NA</u>
Sludge:	<u>NE</u>	<u>NE</u>	<u>NA</u>	<u>NA</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

C. INDUSTRIAL USER CONTROL MECHANISM

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

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?
(Reviewed Preformed Line Products Company and Glad Manufacturing control documents.)

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>1-2/YR</u>	<u>1/YR</u>
other SIUs	<u>1-2/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>

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

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 Preformed Line Products Company and Glad Manufacturing control documents.)

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): Yes

6. Overall adequacy of inspection documentation: Very Good.
Inspections are comprehensive.

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? N/E

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 into the 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 Ops 32 and a word document 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?
In accordance with POTW's enforcement response plan.

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

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: NA

Other environmental permits held: NA

Description of operations: NA

Process flow diagrams: NA

Flow measurements: NA

Measurements of regulated pollutants: NA

Certification of compliance by the IU: NA

Compliance schedule (if needed): NA

19. Additional comments on the POTW's inspection and sampling
procedures: _____

E. Enforcement

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

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

Effluent limitations: NOV to AO to fines (can escalate)

Late reports: NOV (unintentional); NOV & AO (SNC); can escalate

Unpermitted discharges: NOV (no harm); AO (harm); can escalate

Slug loads or spills: NOV (failure to respond w/in 5 days); AO (failure to notify w/in 10 days); can escalate

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)? The City of Rogers did not have a significant violator in 2011.

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:
N/A			

5. Comments on the POTW's enforcement procedures:
The enforcement program has been implemented in accordance with the Enforcement Response Plan.
-
-
-
-

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? Inadequate. Mr. Burns states approval has been obtained to hire a full time employee.
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/E
-
3. Does the POTW have copies of permits for IUs in other cities? No
-
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: NA
-
-
-

H. EVALUATION AND COMMENTS

The pretreatment staff is very knowledgeable of the program and requirements. Records are well organized. Inspections appear to be thorough.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Glad Manufacturing Company

POTW Name: City of Rogers

Industry Contacts: Mike Watkins-Environmental Technician

Date and Time of Visit: 5-23-2012/11:30 a.m.-12:45 p.m.

Description of Manufacturing Process: Extrusion of thermoformed polyethylene into plastic sheets to be converted into bags and wrap.

Sources of Process Wastewater:
Location 001-Diluted water based ink, washed off extrusion printers, cooling tower/water softener blowdown
Location 002-cooling tower blowdown

Categorical Industry?
No

Basis for Limits: City Ordinance

Description of Pretreatment Equipment and Procedures: Glad Manufacturing does not have a pretreatment system at either location. Glad Manufacturing has been able to meet permit limits without additional treatment.

Spill Prevention and Solvent Management Procedures: SPCC plan, slug control plan, plugged majority of the floor drains, and secondary containment is used throughout the facility.

Sampling Location and Equipment: Location 001-monitoring site flume is located on the SE corner of the south plant. Location 002 is located on the NE corner of the north plant. Location 001 has a refrigerated automatic sampler (ISCO 3710R) and an ISCO 4230 Bubbler Flow Meter. Location 002 is no longer in use.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Preformed Line Products CompanyPOTW Name: City of RogersIndustry Contacts: Steve Renfro, Senior Industrial EngineerDate and Time of Visit: May 23, 2012/9:30 a.m.-11:10 a.m.

Description of Manufacturing Process:

Aluminum wire is coated with oil, drawn, and formed. Then, it is cleaned in an alkaline wash. Galvanized wire is formed and then cleaned in a separate alkaline wash. After cleaning, both types of wire share the same rinse tank. Other processes include: tumbling for deburring; stamping of aluminum and stainless steel; twisted steel cables for pole line hardware; and using neoprene for welding and assembling of telephone cable splices. Injection and compression molding. Plastic resins are used to mold various casings and hardware parts (no discharge). Finishing includes gluing, cabling, bending, and packing.

Sources of Process Wastewater:

PW2: wastestream from aluminum and galvanized rinse tank; PW3: wastestream from aluminum cleaning tank; PW4: non/categorical wastestream from galvanized cleaning tank

Categorical Industry? YesBasis for Limits: 40 CFR 467.55, subpart EPoint of Application: Point of discharge

Description of Pretreatment Equipment and Procedures:

All required process waste flows to a 5,500 gallon above ground storage tank located outside next to the north wall. After collection, the waste is batch treated. Water passes through an oil skimmer. Water is pumped to a holding tank where a permanganate oxidizer is added to solidify the oil and grease. The wastewater is then pumped through a series of three filters with media that removes the metals and solids. pH is also adjusted during this time. The filters backwash to the same 5500 gallon storage tank.

Wastewater from the galvanized and aluminum clean lines is dumped every 4-5 weeks. The volume is 4000 gallons per dump per tank. The 4000 gallons from the galvanized and aluminum cleaning tank runs through pretreatment. The rinse tank rinses both galvanized and aluminum product from the 2 clean lines. The rinse tank does not go through pretreatment and flows through the monitoring flume. Almost all ancillary process wastewater goes through pretreatment.

Spill Prevention and Solvent Management Procedures:
Slug control plan

Sampling Location and Equipment:
A monitoring site flume located outside along the north central wall of the facility. Facility uses an ISCO Model 4310 Ultrasonic flow meter and an ISCO automatic sampler.

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>May 22 & 23, 2012</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