

ADEQ

ARKANSAS
Department of Environmental Quality

November 8, 2016

Earl Rausch, Utility Superintendent
City of Rogers
4300 Rainbow Rd.
Rogers, AR 72758

RE: Rogers Pollution Cont. Fac. Inspection
AFIN: 04-00155 Permit No.: AR0043397

Dear Mr. Raush:

On October 18 and 19, 2016, I performed a Compliance Evaluation Inspection and a Sanitary Sewer Overflow/Collection System 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.


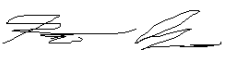

Please refer to the “Summary of Findings” section of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. 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 **November 22, 2016**.

If I can be of any assistance, please contact me at grimesg@adeq.state.ar.us or (479)267-0811 ext. 16.

Sincerely,



Garrett Grimes
District 1 Field Inspector
Water Division

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT						
		AFIN: 04-00155		PERMIT #: AR0043397		DATE: 10/19/2016		
		COUNTY: 04 Benton			PDS #: 093804		MEDIA: WN	
		GPS LAT: 36.29805 LONG: -94.21348 LOCATION: Entrance						
FACILITY INFORMATION			INSPECTION INFORMATION					
NAME: Rogers Pollution Cont. Fac. LOCATION: 4300 Rainbow Road CITY: Rogers			FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 104111 S - State			
RESPONSIBLE OFFICIAL NAME / TITLE: Earl Rausch / Utility Superintendent COMPANY: City of Rogers MAILING ADDRESS: 4300 Rainbow Rd. CITY, STATE, ZIP: Rogers AR 72758 PHONE & EXT: / FAX: (479)273-7378 / EMAIL:			FACILITY EVALUATION RATING: 4 - Satisfactory		INSPECTION TYPE: Compliance Evaluation			
			DATE(S): 10/19/2016		ENTRY TIME: 08:45		EXIT TIME: 12:30	
					PERMIT EFFECTIVE DATE: 1/31/2006 PERMIT EXPIRATION DATE: 2/28/2018			
			FAYETTEVILLE SHALE RELATED: N					
			FAYETTEVILLE SHALE VIOLATIONS: N					
			INSPECTION PARTICIPANTS					
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Todd Beaver, Plant Manager, City of Rogers David Straib, Operations Team Leader, City of Rogers Jason Bolenbaugh, Branch Manager, ADEQ Garrett Grimes, District 1 Inspector, ADEQ					
CONTACTED DURING INSPECTION: No								
AREA EVALUATIONS								
<small>(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)</small>								
S	PERMIT	S	FLOW MEASUREMENT	N	STORMWATER			
S	RECORDS/REPORTS	S	LABORATORY	S	FACILITY SITE REVIEW			
S	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM			
S	SAMPLING	M	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT			
**	OTHER:							
SUMMARY OF FINDINGS								
<ul style="list-style-type: none"> Documentation of sludge records are not maintained as required by 40 CFR 503. 								
GENERAL COMMENTS								
Calibration records for the DO meter should be updated to include water temperature.								
INSPECTOR'S SIGNATURE: 					DATE: 11/7/2016			
SUPERVISOR'S SIGNATURE: 					DATE: 11/7/2016			

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: Backup generators in place	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE: Cooling screw on sludge dehydrator is malfunctioning. Replacement part ordered.	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: Scada system	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: Overflow was due to exceptional rain event. Overflow at the EQ basin.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: December 28, 2015 from 1 AM to 6 AM	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: 5' Parshall Flume TYPE OF DEVICE: No manual flow device for Outfall 002.	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: Greyline SLT 5.0	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE: Factory calibrated <1-year old. Installed in May. Second unit replacement in 2 years due to lightning.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: See above	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: David Straib stated he is working on a calibration procedure for the new unit.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: Huther and Associates, Inc.	
b. LAB ADDRESS: 1156 North Bonnie Brae, Denton, TX	
c. PARAMETERS PERFORMED: Chronic Biomonitoring	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON VISUAL OBSERVATIONS ONLY						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	None	None	None	None	None	Clear	--
002A	None	None	None	None	None	Clear	
002B	No Flow	No Flow	No Flow	No Flow	No Flow	No Flow	
SECTION H: SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS:							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: disposal records not maintained.						<input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):						Class A applied in Missouri	
SECTION I: SAMPLING INSPECTION PROCEDURES							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. SAMPLE SPLIT WITH PERMITTEE:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
DETAILS: No Exposure Stormwater Certificate							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
8. LIST OF STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
9. LIST OF NON-STRUCTURAL BMPS:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE	

FLOW CALCULATION SHEET

Date: **10/19/2016** Time: **10:30**

Head in Inches: Feet:

Type & Size of Primary Flow Measurement Device: **5 Foot Parshall Flume**

Name & Model of Secondary Flow Measurement Device: **Greyline Instruments Inc. SLT 5.0 Level & Flow Meter**

Date of last Calibration of Secondary Flow Device: **Installed in May.**

Recorded Flow at Date & Time Listed Above: **10/19/2016 10:30** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **10/19/2016 10:30**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

% Error =	Recorded Value	-	Calculated Value	X 100	
	Calculated Value				

% Error =	6.26	-	6.25	X 100	
	6.25				

% Error =	.01	X 100	
	6.25		

% Error =	0.0016	X 100	
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% Error =	0.16	%	
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Comments: **MGD indicated on staff gauge.**

DMR Calculation Check

Reporting Period: From 2016 03 01 To 2016 03 31
 Year Month Day Year Month Day

Parameter Checked: BOD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>87</u>	<u>1.3</u>	<u>1.6</u>
Calculated Value:	<u>87.4</u>	<u>1.3</u>	<u>1.6</u>
Permit Value:	<u>1751</u>	<u>15; 10*</u>	<u>23; 15*</u>

If calculated value does not equal reported value, explain:

Reported value for loading mass is rounded to a whole number.

*Indicates permit value for outfalls 001 and 002 as (Outfall 001 value; Outfall 002 value). Samples used for compliance with outfall 001 are also used for outfall 002.

DMR Calculation Check

Reporting Period: From 2016 05 01 To 2016 05 31
 Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>33</u>	<u>0.5</u>	<u>0.6</u>
Calculated Value:	<u>33.4</u>	<u>0.5</u>	<u>0.6</u>
Permit Value:	<u>1751</u>	<u>15; 15*</u>	<u>23; 23*</u>

If calculated value does not equal reported value, explain:

Reported value for loading mass is rounded to a whole number.

*Indicates permit value for outfalls 001 and 002 as (Outfall 001 value; Outfall 002 value). Samples used for compliance with outfall 001 are also used for outfall 002.

Water Division Photographic Evidence Sheet

Location:	Rogers Pollution Cont. Fac.		
Photographer:	Garrett Grimes, District 1 Inspector	Date:	10/19/2016
Witness:	Jason Bolenbaugh, Branch Manager	Time:	9:03
		Photo #:	1
Description:	Influent at the head of the facility. Grate was removed due to maintenance.		



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
Witness:	Garrett Grimes, District 1 Inspector	Time:	9:11
		Photo #:	2
Description:	Solids removed from influent. Solids are land applied as a Class A sludge.		



Water Division Photographic Evidence Sheet

Location: Rogers Pollution Cont. Fac.			
Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	9:26
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			3
Description: Anoxic and aerobic treatment train built in 2008.			



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	9:36
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			4
Description: Clarifier receiving water from train in Photo #3. Clarifier was built in 2008 and is partially covered.			



Water Division Photographic Evidence Sheet

Location:	Rogers Pollution Cont. Fac.		
Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	9:47
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			5
Description:	Anoxic and aerobic treatment train built prior to the 2008 update.		



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:07
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			6
Description:	Clarifier receiving water from train in Photo #5. Clarifier has been updated to be functionally identical to the clarifier in Photo #4.		



Water Division Photographic Evidence Sheet

Location: Rogers Pollution Cont. Fac.			
Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:11
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			7
Description: Sand filter which receives water from the clarifiers.			



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:19
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			8
Description: Chlorine contact chamber which receives water from the sand filter.			



Water Division Photographic Evidence Sheet

Location:	Rogers Pollution Cont. Fac.		
Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:20
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			9
Description:	Algal growth in the chlorine contact chamber.		



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:28
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			10
Description:	5-foot Parshall Flume.		



Water Division Photographic Evidence Sheet

Location: Rogers Pollution Cont. Fac.			
Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:33
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			11
Description: Refrigerated section of the composite sampler.			



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:38
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			12
Description: Secondary flow measurement device.			



Water Division Photographic Evidence Sheet

Location: Rogers Pollution Cont. Fac.			
Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:53
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			13
Description: Outfall 002-A located at Pinnacle Golf Course.			



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:57
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			14
Description: Outfall 002-B. Discharge to different ponds is controlled by Pinnacle Golf Course.			



Water Division Photographic Evidence Sheet

Location:	Rogers Pollution Cont. Fac.		
Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	11:07
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			15
Description:	Outfall 001.		



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	11:08
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			16
Description:	Outfall 001 overview.		



Water Division Photographic Evidence Sheet

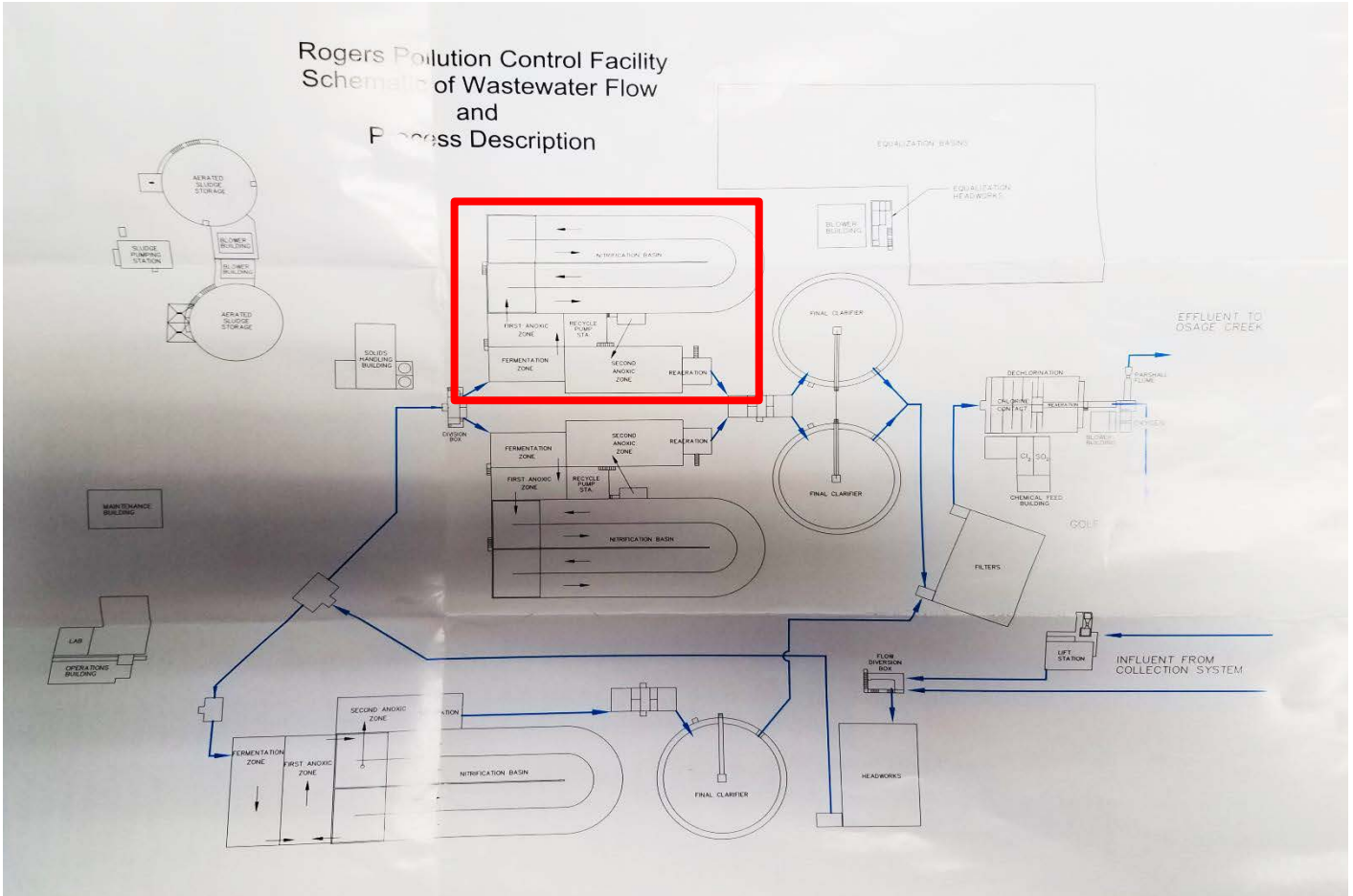
Location: Rogers Pollution Cont. Fac.			
Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:44
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			17
Description: Dehydrated sludge from the clarifiers.			



Photographer:	Jason Bolenbaugh, Branch Manager	Date:	10/19/2016
		Time:	10:44
Witness:	Garrett Grimes, District 1 Inspector		Photo #:
			18
Description: Dehydrated sludge packaged for disposal in a solid waste landfill in Tontitown.			



Figure 1: Outline of the wastewater treatment process at Rogers Pollution Control Facility. Train in the red box was not in use at the time of the inspection.



From: [Todd Beaver](#)
To: [Water-Inspection-Report](#)
Cc: [Earl Rausch](#); [Grimes, Garrett](#)
Subject: November 8, 2016 letter response AFIN: 04-00155 Permit No: AR0043397
Date: Monday, November 21, 2016 3:19:26 PM
Attachments: [deq_nov_8_letter_response_with_support.pdf](#)

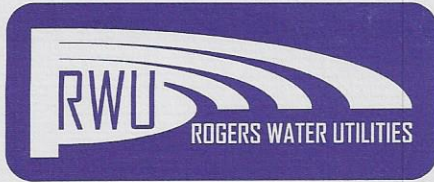
Mr. Grimes,

Please find our response to your letter attached. If there is a correction to the original report, please send me a corrected copy for my records as we discussed on the phone today. November and December support are not yet available since testing (and production) hasn't been completed.

Sincerely,

Todd Beaver, P.E.
Plant Manager
479-273-7378





ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

April 29, 2011

Mr. Garrett Grimes
District 1 Field Inspector
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118-5317
Submitted via email: Water-Inspection-Report@adeq.state.ar.us

RE: Rogers Pollution Cont. Fac. Inspection
AFIN: 04-00155 Permit No.: AR0043397

Dear Mr. Grimes:

Please accept this response of your letter dated November 8, 2016. In the "Summary of Findings" there was one violation noted.

- Documentation of sludge records are not maintained as required by 40 CFR 503

After a brief phone conversation 11/29/2016 with you for clarification, you stated you were referring to our not maintaining quantity records on site.

My response is to first classify our biosolids program to know which section of 40 CFR 503 applies to our facility. We generate a Class A exceptional quality biosolid for distribution as defined in 40 CFR 503.13 Pollutant limits. We also meet the pathogen requirements in 503.32 and 503.33. You will notice in 503.10 applicability parts (a) through (g) all note that generators of Class A exceptional quality as noted 503.12 and 503.14 do not apply.

Section 503.12 is the general requirements that cause the generator to keep records of where the sludge is disposed, it requires the generator to provide the information to applicler for compliance with the section, and a few other things not as cogent to this discussion.

Section 503.14 is the management practices section. It requires us to label the sludge and define application rates as well as limits where the sludge may be applied.

Noting the release from 503.12 and 503.14, there is no true way for a generator to know how the sludge is disposed of once it leaves their facility. I look to section 503.17 record keeping since your report noted documentation and it's likely our product is land applied rather than disposed of since it is purchased. It requires the following:

(6) If the requirements in §503.13(a)(4)(ii) are met when sewage sludge is sold or given away in a bag or other container for application to the land, the person who prepares the sewage sludge that is sold or given away in a bag or other container shall develop the following information and shall retain the information for five years:

(i) The annual whole sludge application rate for the sewage sludge that does not cause the annual pollutant loading rates in Table 4 of §503.13 to be exceeded.

(ii) The concentration of each pollutant listed in Table 4 of §503.13 in the sewage sludge.

(iii) The following certification statement:

I certify, under penalty of law, that the information that will be used to determine compliance with the management practice in §503.14(e), the Class A pathogen requirement in §503.32(a), and the vector attraction reduction requirement in (insert one of the vector attraction reduction requirements in §503.33(b)(1) through §503.33(b)(8)) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(iv) A description of how the Class A pathogen requirements in §503.32(a) are met.

(v) A description of how one of the vector attraction requirements in §503.33 (b)(1) through (b)(8) is met.

Those are the records we have maintained and submitted.

I believe there is confusion between the rules for class B sludge land application and our process which does require the maintenance records of quantity and location. However, even in that case 501.17(4) ii clearly places the role of quantity, date, and other management on the applicator rather than the producer. There may be other sections that apply since I don't participate in that program. But Class B is the only land application method I find where those requirements are present at all, so I assume there may have been some misunderstanding of our process and the requirements.

The cover letter does state I need to document my compliance, so I have also attached our requirements as noted above.

Yours truly,



Todd Beaver, P.E.
Plant Manager

Rogers Pollution Control Rogers, Arkansas

Biosolids Report Notice and Necessary Information

Monitoring Period: (1) Jan-Feb

Metal Analysis Requirements

Pollutant Name	Concentration (mg/kg) Dry Weight	Pollutant Concentration Table 3, 40 CFR 503.13
Arsenic	2.50	41 mg/kg (Passed)
Cadmium	0.84	39 mg/kg (Passed)
Chromium	14.50	1200 mg/kg (Passed)
Copper	120.00	1500 mg/kg (Passed)
Lead	5.74	300 mg/kg (Passed)
Mercury	0.11	17 mg/kg (Passed)
Molybdenum	3.31	N/A (Passed)
Nickel	15.00	420 mg/kg (Passed)
Selenium	5.55	100 mg/kg (Passed)
Zinc	359.00	2800 mg/kg (Passed)
Total % N	8.37	
Total % P	2.49	
Total % K	0.92	

Pathogen Reduction Requirement (40 CFR 503.32).

Alternative 1: Thermally Treated Biosolids
Class A

Fecal coliform Result: 2 MPN/g dry wt.
(Passed)

EPA Limit: <1000 MPN/g dry wt.

Vector Attraction Reduction Requirement (40 CFR 503.33).

Option 8: Total Solids of at least 90%
(prior to mixing with with other materials)

Total Solids Result: 92.9 %
(Passed)

"I certify under penalty of law that the metal requirements, Class A pathogen requirements, vector attraction requirements and all other necessary requirements in 40 CFR Part 503 have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gathered and evaluated the information used to determine that the requirements have been met. I am aware that there are significant penalties for false certification, including the possibility of fine and imprisonment."

Signature David Alford

Date 6-22-16


CERTIFICATION STATEMENT AS REQUIRED BY 40 CFR PART 503.17

**City of Rogers, Arkansas
Wastewater Treatment Facility
NPDES Permit No. AR00433937
Biosolids Dryer Facility**

"I certify, under penalty of law, that the Class A pathogen requirements in 40 CFR Part 503.32 (a) (3) and the vector attraction reduction requirement in 503.33 (b) (8) have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the pathogen requirements and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."



David Staib
Wastewater Operations Supervisor
Rogers Water Utilities
Phone: 479-273-7378
Fax: 479-273-7627



Date

DESCRIPTION OF HOW CLASS A PATHOGEN REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $> 212^{\circ}$ F (100° C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for fecal coliform according to Standard Methods for the Analysis of Water and Wastewater, Part 9221 E-2006. The test is performed at a frequency no less than the required minimum as described in 40 CFR Part 503. Estimation of bacterial density of the sample is calculated and meets the following criteria:

Less than 1000 MPN per gram of total solids (dry weight basis)

DESCRIPTION OF HOW VECTOR ATTRACTION REDUCTION REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $>212^{\circ}$ F (100° C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for Total Solids according to Standard Methods for the Analysis of Water and Wastewater, Part 2540 G. The test is performed at frequency no less than the required minimum as described in 40 CFR Part 503. Total Solids of the sewage sludge meets the following criteria:

Percent solids are equal to or greater than 90% prior to mixing with other materials.

Rogers Pollution Control Rogers, Arkansas

Biosolids Report Notice and Necessary Information

Monitoring Period: (2) March-April

Metal Analysis Requirements

Pollutant Name	Concentration (mg/kg) Dry Weight	Pollutant Concentration Table 3, 40 CFR 503.13
Arsenic	2.58	41 mg/kg (Passed)
Cadmium	0.77	39 mg/kg (Passed)
Chromium	15.50	1200 mg/kg (Passed)
Copper	118.00	1500 mg/kg (Passed)
Lead	5.81	300 mg/kg (Passed)
Mercury	0.18	17 mg/kg (Passed)
Molybdenum	4.06	N/A (Passed)
Nickel	14.90	420 mg/kg (Passed)
Selenium	10.80	100 mg/kg (Passed)
Zinc	386.00	2800 mg/kg (Passed)
Total % N	8.21	
Total % P	2.87	
Total % K	0.97	

Pathogen Reduction Requirement (40 CFR 503.32).

Alternative 1: Thermally Treated Biosolids
Class A

Fecal coliform Result: 2 MPN/g dry wt.
(Passed)

EPA Limit: <1000 MPN/g dry wt.

Vector Attraction Reduction Requirement (40 CFR 503.33).

Option 8: Total Solids of at least 90%
(prior to mixing with with other materials)

Total Solids Result: 95.2 %
(Passed)

"I certify under penalty of law that the metal requirements, Class A pathogen requirements, vector attraction requirements and all other necessary requirements in 40 CFR Part 503 have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gathered and evaluated the information used to determine that the requirements have been met. I am aware that there are significant penalties for false certification, including the possibility of fine and imprisonment."

Signature



Date

6-22-16

CERTIFICATION STATEMENT AS REQUIRED BY 40 CFR PART 503.17

**City of Rogers, Arkansas
Wastewater Treatment Facility
NPDES Permit No. AR00433937
Biosolids Dryer Facility**

"I certify, under penalty of law, that the Class A pathogen requirements in 40 CFR Part 503.32 (a) (3) and the vector attraction reduction requirement in 503.33 (b) (8) have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the pathogen requirements and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."



David Staib
Wastewater Operations Supervisor
Rogers Water Utilities
Phone: 479-273-7378
Fax: 479-273-7627

6-22-16

Date

DESCRIPTION OF HOW CLASS A PATHOGEN REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $> 212^{\circ} \text{F}$ (100°C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for fecal coliform according to Standard Methods for the Analysis of Water and Wastewater, Part 9221 E-2006. The test is performed at a frequency no less than the required minimum as described in 40 CFR Part 503. Estimation of bacterial density of the sample is calculated and meets the following criteria:

Less than 1000 MPN per gram of total solids (dry weight basis)

DESCRIPTION OF HOW VECTOR ATTRACTION REDUCTION REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $>212^{\circ} \text{F}$ (100°C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for Total Solids according to Standard Methods for the Analysis of Water and Wastewater, Part 2540 G. The test is performed at frequency no less than the required minimum as described in 40 CFR Part 503. Total Solids of the sewage sludge meets the following criteria:

Percent solids are equal to or greater than 90% prior to mixing with other materials.

**Rogers Pollution Control
Rogers, Arkansas**

Biosolids Report
Notice and Necessary Information

Monitoring Period: (3) May-June

Metal Analysis Requirements

Pollutant Name	Concentration (mg/kg) Dry Weight	Pollutant Concentration Table 3, 40 CFR 503.13	
Arsenic	2.31	41 mg/kg	(Passed)
Cadmium	0.65	39 mg/kg	(Passed)
Chromium	13.60	1200 mg/kg	(Passed)
Copper	112.00	1500 mg/kg	(Passed)
Lead	4.62	300 mg/kg	(Passed)
Mercury	0.02	17 mg/kg	(Passed)
Molybdenum	3.31	N/A	(Passed)
Nickel	11.60	420 mg/kg	(Passed)
Selenium	12.00	100 mg/kg	(Passed)
Zinc	408.00	2800 mg/kg	(Passed)
Total % N	8.76		
Total % P	3.27		
Total % K	1.03		

Pathogen Reduction Requirement (40 CFR 503.32).

Alternative 1: Thermally Treated Biosolids
Class A

Fecal coliform Result: 2 MPN/g dry wt.
(Passed)

EPA Limit: <1000 MPN/g dry wt.

Vector Attraction Reduction Requirement (40 CFR 503.33).

Option 8: Total Solids of at least 90%
(prior to mixing with with other materials)

Total Solids Result: 93.4 %
(Passed)

"I certify under penalty of law that the metal requirements, Class A pathogen requirements, vector attraction requirements and all other necessary requirements in 40 CFR Part 503 have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gathered and evaluated the information used to determine that the requirements have been met. I am aware that there are significant penalties for false certification, including the possibility of fine and imprisonment."

Signature David Starb

Date 11-04-16

CERTIFICATION STATEMENT AS REQUIRED BY 40 CFR PART 503.17

**City of Rogers, Arkansas
Wastewater Treatment Facility
NPDES Permit No. AR00433937
Biosolids Dryer Facility**

"I certify, under penalty of law, that the Class A pathogen requirements in 40 CFR Part 503.32 (a) (3) and the vector attraction reduction requirement in 503.33 (b) (8) have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the pathogen requirements and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."



David Staib
Wastewater Operations Supervisor
Rogers Water Utilities
Phone: 479-273-7378
Fax: 479-273-7627

11-04-16

Date

DESCRIPTION OF HOW CLASS A PATHOGEN REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $> 212^{\circ} \text{F}$ (100°C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for fecal coliform according to Standard Methods for the Analysis of Water and Wastewater, Part 9221 E-2006. The test is performed at a frequency no less than the required minimum as described in 40 CFR Part 503. Estimation of bacterial density of the sample is calculated and meets the following criteria:

Less than 1000 MPN per gram of total solids (dry weight basis)

DESCRIPTION OF HOW VECTOR ATTRACTION REDUCTION REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $> 212^{\circ} \text{F}$ (100°C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for Total Solids according to Standard Methods for the Analysis of Water and Wastewater, Part 2540 G. The test is performed at frequency no less than the required minimum as described in 40 CFR Part 503. Total Solids of the sewage sludge meets the following criteria:

Percent solids are equal to or greater than 90% prior to mixing with other materials.

Rogers Pollution Control Rogers, Arkansas

Biosolids Report Notice and Necessary Information

Monitoring Period: (4) July-Aug.

Metal Analysis Requirements

Pollutant Name	Concentration (mg/kg) Dry Weight	Pollutant Concentration Table 3, 40 CFR 503.13
Arsenic	3.47	41 mg/kg (Passed)
Cadmium	0.92	39 mg/kg (Passed)
Chromium	17.20	1200 mg/kg (Passed)
Copper	133.00	1500 mg/kg (Passed)
Lead	5.19	300 mg/kg (Passed)
Mercury	0.07	17 mg/kg (Passed)
Molybdenum	3.41	N/A (Passed)
Nickel	13.50	420 mg/kg (Passed)
Selenium	13.30	100 mg/kg (Passed)
Zinc	581.00	2800 mg/kg (Passed)
Total % N	7.91	
Total % P	3.17	
Total % K	0.90	

Pathogen Reduction Requirement (40 CFR 503.32).

Alternative 1: Thermally Treated Biosolids
Class A

Fecal coliform Result: 2 MPN/g dry wt.
(Passed)

EPA Limit: <1000 MPN/g dry wt.

Vector Attraction Reduction Requirement (40 CFR 503.33).

Option 8: Total Solids of at least 90%
(prior to mixing with with other materials)

Total Solids Result: 91.1 %
(Passed)

"I certify under penalty of law that the metal requirements, Class A pathogen requirements, vector attraction requirements and all other necessary requirements in 40 CFR Part 503 have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gathered and evaluated the information used to determine that the requirements have been met. I am aware that there are significant penalties for false certification, including the possibility of fine and imprisonment."


Signature David Stubb

Date 11-04-16


CERTIFICATION STATEMENT AS REQUIRED BY 40 CFR PART 503.17

**City of Rogers, Arkansas
Wastewater Treatment Facility
NPDES Permit No. AR00433937
Biosolids Dryer Facility**

"I certify, under penalty of law, that the Class A pathogen requirements in 40 CFR Part 503.32 (a) (3) and the vector attraction reduction requirement in 503.33 (b) (8) have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the pathogen requirements and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."



David Staib
Wastewater Operations Supervisor
Rogers Water Utilities
Phone: 479-273-7378
Fax: 479-273-7627



Date

DESCRIPTION OF HOW CLASS A PATHOGEN REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $> 212^{\circ}$ F (100° C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for fecal coliform according to Standard Methods for the Analysis of Water and Wastewater, Part 9221 E-2006. The test is performed at a frequency no less than the required minimum as described in 40 CFR Part 503. Estimation of bacterial density of the sample is calculated and meets the following criteria:

Less than 1000 MPN per gram of total solids (dry weight basis)

DESCRIPTION OF HOW VECTOR ATTRACTION REDUCTION REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $>212^{\circ}$ F (100° C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for Total Solids according to Standard Methods for the Analysis of Water and Wastewater, Part 2540 G. The test is performed at frequency no less than the required minimum as described in 40 CFR Part 503. Total Solids of the sewage sludge meets the following criteria:

Percent solids are equal to or greater than 90% prior to mixing with other materials.

**Rogers Pollution Control
Rogers, Arkansas**

**Biosolids Report
Notice and Necessary Information**

Monitoring Period: (5) Sept-Oct

Metal Analysis Requirements

Pollutant Name	Concentration (mg/kg) Dry Weight	Pollutant Concentration Table 3, 40 CFR 503.13
Arsenic	2.56	41 mg/kg (Passed)
Cadmium	0.91	39 mg/kg (Passed)
Chromium	19.30	1200 mg/kg (Passed)
Copper	176.00	1500 mg/kg (Passed)
Lead	6.70	300 mg/kg (Passed)
Mercury	0.02	17 mg/kg (Passed)
Molybdenum	5.00	N/A (Passed)
Nickel	16.00	420 mg/kg (Passed)
Selenium	14.20	100 mg/kg (Passed)
Zinc	517.00	2800 mg/kg (Passed)
Total % N	7.91	
Total % P	3.17	
Total % K	0.90	

Pathogen Reduction Requirement (40 CFR 503.32).

Alternative 1: Thermally Treated Biosolids
Class A

Fecal coliform Result: 2 MPN/g dry wt.
(Passed)

EPA Limit: <1000 MPN/g dry wt.

Vector Attraction Reduction Requirement (40 CFR 503.33).

Option 8: Total Solids of at least 90%
(prior to mixing with with other materials)

Total Solids Result: 96.7 %
(Passed)

"I certify under penalty of law that the metal requirements, Class A pathogen requirements, vector attraction requirements and all other necessary requirements in 40 CFR Part 503 have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gathered and evaluated the information used to determine that the requirements have been met. I am aware that there are significant penalties for false certification, including the possibility of fine and imprisonment."

Signature David Stealy

Date 11-04-16

CERTIFICATION STATEMENT AS REQUIRED BY 40 CFR PART 503.17

**City of Rogers, Arkansas
Wastewater Treatment Facility
NPDES Permit No. AR00433937
Biosolids Dryer Facility**

"I certify, under penalty of law, that the Class A pathogen requirements in 40 CFR Part 503.32 (a) (3) and the vector attraction reduction requirement in 503.33 (b) (8) have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine that the pathogen requirements and vector attraction reduction requirements have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."



David Staib
Wastewater Operations Supervisor
Rogers Water Utilities
Phone: 479-273-7378
Fax: 479-273-7627



Date

DESCRIPTION OF HOW CLASS A PATHOGEN REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $> 212^{\circ}$ F (100° C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for fecal coliform according to Standard Methods for the Analysis of Water and Wastewater, Part 9221 E-2006. The test is performed at a frequency no less than the required minimum as described in 40 CFR Part 503. Estimation of bacterial density of the sample is calculated and meets the following criteria:

Less than 1000 MPN per gram of total solids (dry weight basis)

DESCRIPTION OF HOW VECTOR ATTRACTION REDUCTION REQUIREMENTS ARE MET

The sewage sludge at the Rogers, Arkansas POTW undergoes thermal treatment at $>212^{\circ}$ F (100° C) for 2 hours and twenty minutes. A grab sample is taken and analyzed for Total Solids according to Standard Methods for the Analysis of Water and Wastewater, Part 2540 G. The test is performed at frequency no less than the required minimum as described in 40 CFR Part 503. Total Solids of the sewage sludge meets the following criteria:

Percent solids are equal to or greater than 90% prior to mixing with other materials.

ADEQ

ARKANSAS
Department of Environmental Quality

November 28, 2016

Earl Rausch, Utility Superintendent
City of Rogers
4300 Rainbow Rd.
Rogers, AR 72758

RE: Adequate Response to Inspection
AFIN: 04-00155 Permit No.: AR0043397

Dear Mr. Raush:

The Department has received your response to the inspection conducted on October 19, 2016. Your response adequately addresses the request in the Summary of Findings section of the report.

If I need further information concerning this matter, I will contact you. Thank you for your attention to this matter. If I can be any assistance please feel free to contact me at grimesg@adeq.state.ar.us or 479.267.0811 ext. 16.

Sincerely,



Garrett Grimes
District 1 Field Inspector
Water Division