ADEQ

A R K A N S A S
Department of Environmental Quality

October 10, 2017

Mr. Earl Rausch, Utility Superintendent
City of Rogers
P.O. Box 338
Rogers, AR 72757

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

Dear Mr. Rausch:

On September 6 and 7, 2017, ADEQ performed a Pretreatment Compliance Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.

No violations were noted at the time of the inspection. Please refer to the attached inspection report for any comments.

If I can be of any assistance, please contact me at Bolenbaugh@adeq.state.ar.us or 501-682-0659.

Sincerely,

Jason Bolenbaugh
Compliance Branch Manager
Office of Water Quality

ADEQ
ARKANSAS
Department of Environmental Quality

# WATER DIVISION INSPECTION REPORT

| AFIN: **04-00155** | PERMIT #: **AR0043397** | DATE: **9/6/2017** |
|---|---|---|
| COUNTY: **04 Benton** | PDS #: **099507** | MEDIA: **WN** |
| GPS LAT: | LONG: | LOCATION: **********|

## FACILITY INFORMATION

NAME:
**Rogers Pollution Control Fac.**
LOCATION:
**4300 Rainbow Rd.**
CITY:
**Rogers**

## RESPONSIBLE OFFICIAL

NAME: / TITLE
**Mr. Earl Rausch / Utility Superintendent**
COMPANY:
**City of Rogers**
MAILING ADDRESS:
**P.O. Box 338**
CITY, STATE, ZIP:
**Rogers AR 72757**
PHONE & EXT: / FAX:
**479-936-3425 /**
EMAIL:
**earlrausch@rwu.org**
CONTACTED DURING INSPECTION: **Yes**

## INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**
INSPECTOR ID#: **83321 S - State**
FACILITY EVALUATION RATING: **5 - Satisfactory**
INSPECTION TYPE: **Pretreatment Compliance**

| DATE(S): | ENTRY TIME: | EXIT TIME: |
|---|---|---|
| **9/6/2017** | **09:20** | **14:40** |
| **9/7/2017** | **09:00** | **11:15** |

PERMIT EFFECTIVE DATE: **3/1/2006**
PERMIT EXPIRATION DATE: **2/28/2011**

FAYETTEVILLE SHALE RELATED: **N**
FAYETTEVILLE SHALE VIOLATIONS: **N**

## INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
**Garrett Grimes, ADEQ Inspector (Fayetteville)**
**Ankush Nautiyal, ADEQ Inspector (Fayetteville)**
**Paul Burns, Pretreatment Coordinator, RWU**

## AREA EVALUATIONS

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

| | | | | | |
|---|---|---|---|---|---|
| **S** | PERMIT | ** | FLOW MEASUREMENT | ** | STORMWATER |
| **S** | RECORDS/REPORTS | ** | LABORATORY | ** | FACILITY SITE REVIEW |
| **S** | OPERATION & MAINTENANCE | ** | EFFLUENT/RECEIVING WATER | **S** | SELF-MONITORING PROGRAM |
| ** | SAMPLING | ** | SLUDGE HANDLING/DISPOSAL | **S** | PRETREATMENT |
| ** | OTHER: | | | | |

## SUMMARY OF FINDINGS

**No violations were noted at the time of the visit. The pretreatment personnel are very knowledgeable of their facilities and have a very organized program. ADEQ appreciates their cooperativeness in allowing us to utilize office space for records review and their availability to conduct the audit on a second day when it was not originally planned.**

## GENERAL COMMENTS

INSPECTOR'S SIGNATURE: ←Click text to left to add signature **-Inspector Name** DATE:

SUPERVISOR'S SIGNATURE: **Jason Bolenbaugh** DATE: **10/9/2017**

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**

**PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT**

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Name of Municipality: **City of Rogers**

AFIN Number: **04-00155**

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

Program Tracked under NPDES Permit Number: **AR0043397**

Fact Sheet Preparation Date: **8/15/2006**

Date of Last PCI/Audit: **5/21/2012 (PCI)/11/4/2014 (Audit)**

Date of Last Annual Report: **1/24/2017**

Name of Inspector: **Jason Bolenbaugh**

Date PCI Performed: **9/6/2017 & 9/7/2017**

Name, Title, and Telephone Number of Facility Representative:
**Paul Burns, Pretreatment Coordinator, Rogers Water Utility (RWU)**

Name and Title of Other Participants: **Paul Burns (City of Rogers)**
**Garrett Grimes & Ankush Nautiyal, ADEQ Inspectors (Fayetteville)**

Number of IUs Visited: **2**

Name(s) of IUs Visited: **Southeast Poultry Inc and Bekaert Steel Corporation**

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

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**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.
**Superior Industries & MAFCO. Both were Categorical SIUs and Are no longer in operation.**

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?
**Search for industries through the Chamber of Commerce, phone book, database of food services, surveys of the city, list of water users within a given month. Will review ADEQ hazardous waste documents.**

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) **10**

6. Number of Categorical Industrial Users: **3**

7. How does the POTW determine the appropriate categorical standards to apply to an IU?
**Looked at NAIC Code and the manufacturing process as well as site visits and sampling of pollutants of concern.**

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: |
|---|---|---|
| **Bekaert Steel** | **Metal Finishing** | |
| **Glad Manufacturing** | **Plastic Forming** | |
| **Kennametal** | **Metal Forming** | |
| **Ozark Mt. Poultry** | **Poultry Processing** | |
| **Pel-Freez Arkansas** | **Poultry Processing** | |
| **Preformed Line Products** | **Aluminum Forming** | |
| **Southeast Poultry** | **Poultry Processing** | |
| **Tyson Foods C-N-Q** | **Poultry Processing** | |
| **Tyson of Rogers** | **Poultry Processing** | |
| **WestRock** | | |

B. LOCAL LIMITS

1. **IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA?** **Yes, for CBOD, TSS, and Phosphorus.**

2. Describe any apparent problems with the local limits.
**No, the IU's were able to quickly and easily treat with exception of CBOD at Southeast Poultry.**

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 I n the fact sheet) and part III of the NPDES permit?

| Pollutant: | Frequency: | Requirement in Permit: | Program: | Comments: |
|---|---|---|---|---|
| Metals: | | | | |
| Influent: | **1/Quarter** | **1/Quarter** | **1/Quarter** | |
| Effluent: | **1/Quarter** | **1/Quarter** | **1/Quarter** | |
| Sludge: | **6/Year** | **1/Quarter** | | |
| Organics: | | | | |
| Influent: | **1/Year** | **1/Year** | | |
| Effluent: | **1/Year** | **1/Year** | | |
| Sludge: | **TCLIP 1/Yr** | | | |

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?
**Not by any industries. Only upsets at the POTW were due to weather.**

C. INDUSTRIAL USER CONTROL MECHANISM

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

2. How many IU permits (or other control documents) have been issued?
**There are 10 SIUs. Six permits will expire this year. Not all**

**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.**
**Are all permits current?**
**Yes, all permits are current.**

4. Does the control document contain the following items?

An expiration date: **Yes**

Discharge limitations: **Yes**

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: **Sampling frequencies vary**

IU reporting requirements:
**Analysis results, Pollution Prevention Plan revisions, TOMP Revisions, ASAP violation notifications.**

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: **Yes - Part I, Section A.2**
Type of sample: **Yes - Part I, Section B.1**
Monitoring frequency: **Yes - Part I, Section B.1**
Bypass prohibition: **Yes - Part II, Section B.3**
Right of entry: **Yes - Part II, Section C.9**
Nontransferability: **Yes - Part II, Section A.7**
Revocation clause: **Yes - Part II, Section A.4**
Penalty Provisions: **Yes – Part II, Section E**
Slug load notification: **Yes – Part II, Section D.5**
Notification of process change: **Yes - Part II, Section D.1**

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

| | Current frequency: | Program Requirement: |
|---|---|---|
| Sampling: | | |
| categorical IUs | **At least 1/Year** | **1/Year** |
| other SIUs | **At least 1/Year** | **1/Year** |
| Inspection: | | |
| categorical IUs | **At least 1/Year** | **1/Year** |
| other SIUs | **At least 1/Year** | **1/Year** |

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

3. Are inspections announced or unannounced? **Typically announced**

4. Are records kept of each inspection? **Yes, Very thorough**

5. Does the inspection report contain an adequate description of the following:

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: **Adequate**

**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? **Each IU has an auto sampler they must maintain. He maintains his own pH meter. Ensures auto samplers are properly cooled if not refrigerator.**

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? **Maintains a spreadsheet and DMR log for all 10 IUs**

15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?** **Yes**

**16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?** **Yes, via informal enforcement, informal meetings, NOV, AO, SCO, fines, etc.**

17. What are the POTW's procedures for following up violations? **Will write a violation letter (NOV) describing the violation After ha has conducted a review of self-monitoring data.**

**18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? Have not had to review any.**

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: **During an inspection of Southeast Poultry Inc the POTW noted the facility was diluting the wastewater from the DAF with tap water. The violation was part of the AO issued by the POTW coupled with violations of CBOD within the TRC requirement. The POTW has ensured sample collection (composites) were taken correctly by the IU or contract laboratory.**

E. Enforcement

**1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, there is an Enforcement Response Plan (ERP) in place but is being revised. The POTW is Following their plan.**

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

Effluent limitations: **NOV, AO, Show Cause Order (SCO) (depends on significance and frequency of violations), fines**

Late reports: **NOV, AO, SCO, fines**

Unpermitted discharges: **NOV, AO, SCO, fines**

Slug loads or spills: **NOV, AO, SCO, fines**

**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)? Yes, see the 2016 annual report.**

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: |
|---|---|---|---|
| **Southeast Poultry** | **See Comments** | **AO & $1,000 Fine** | **Already Compliant** |
| **Southeast Poultry** | **Effluent Limits** | **NOV & AO, Fine Pending** | **Already Compliant** |
| | | | |
| | | | |

5. Comments on the POTW's enforcement procedures:
**Southeast Poultry was cited for dilution, inaccurate self-monitoring, and failure to notify of an operational upset. An Administrative Order was issued with a $1,000 fine. The facility gained compliance by the time the AO was issued on August 1, 2016.**

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:
**There are no multijurisdictional IUs**

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 POTW uses the issued permits the primary control mechanism. The POTW has an Memorandum of Agreement with one non-significant Industrial User they use as a control mechanism.**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Bekaert Steel Corporation**

POTW Name: **Rogers Water Utility**

Industry Contacts: **Rodney Bland**

Date and Time of Visit: **9/7/2017**

Description of Manufacturing Process:
**Drawn wire is cabled into different configurations including steel cord for steel belted radial tires, hose wire, and saw wire. Steel wire made up of iron and carbon, and copper and zinc are the most common raw materials used on site.**

Sources of Process Wastewater:
**Outfall 001 discharge consists of the facility's combined process generated waste streams after pretreatment. Outfall 002 discharge consist of the facility's combined sanitary and process generated waste streams.**

Categorical Industry? **Yes**

Basis for Limits: **40 CFR, Parts 403, 420.96, and 433.17**

Point of Application: **Point of discharge**

Description of Pretreatment Equipment and Procedures:
**A 10,000 gallon holding tank receives mostly rinse and air scrubber water from the ISC lines. Wastewater is then pumped into a 3,300 gallon pH adjustment tank with auto-fed hydrated lime. pH is adjusted to an optimal level to remove Copper and Zinc. A polymer is mixed to wastewater flowing to 6,000 gallon clarifier where coagulation and sedimentation occurs. Settled sludge from the clarifier is dewatered and filter pressed. Filter press cakes are disposed of in a landfill.**

Spill Prevention and Solvent Management Procedures:
**Per inspection notes: All chemical storage tanks are bermed and any spills are contained, sent to secondary holding, and then treated. All mechanical chemicals are stored in mechanical room and have secondary containment.**

Sampling Location and Equipment:
**Adequate**

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: **Southeast Poultry Inc.**

POTW Name: **Rogers Water Utility**

Industry Contacts: **Kenneth Elliott**

Date and Time of Visit: **9/7/2016**

Description of Manufacturing Process:
**The process consist of receiving ice packed poultry, transferring the Meat via conveyors through deboning process, mechanically removing Bone and skin, separating, weighing, collecting and disposing offal Parts, and packaging and shipping for additional processing off site.**

Sources of Process Wastewater:
**Approximately 30,000 to 60,000 pounds per day of finished chicken meat Product is processed for approximately 260 days/year.**

Categorical Industry? **No**

Basis for Limits: **40 CFR, Part 403**

Point of Application: **Point of discharge**

Description of Pretreatment Equipment and Procedures:
**Liquid bacteria drip into 15’ wet well where wastewater enters and a dry bacteria is also added. Wastewater is pumped to 80,000 gallon EQ tank then to DAF unit with rotating skimmers. Pretreated water is then sent to the city sewer system and sludge is sent to sludge pit where it is eventually land applied.**

Sampling Location and Equipment:
**Facility has a parshall flume and uses an ISCO flow meter, Model 2400 to collect effluent samples.**

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

| | | |
|---|---|---|
| INSPECTOR'S NAME: | **Paul Burns** | |
| NAME OF FACILITY: | **Rogers Water Utility** | |
| PERMIT NUMBER USED TO TRACK PROGRAM: | **AR0043397** | NPID |
| DATE OF PCI: | **9/6/2017-9/7/2017** | DTIA |

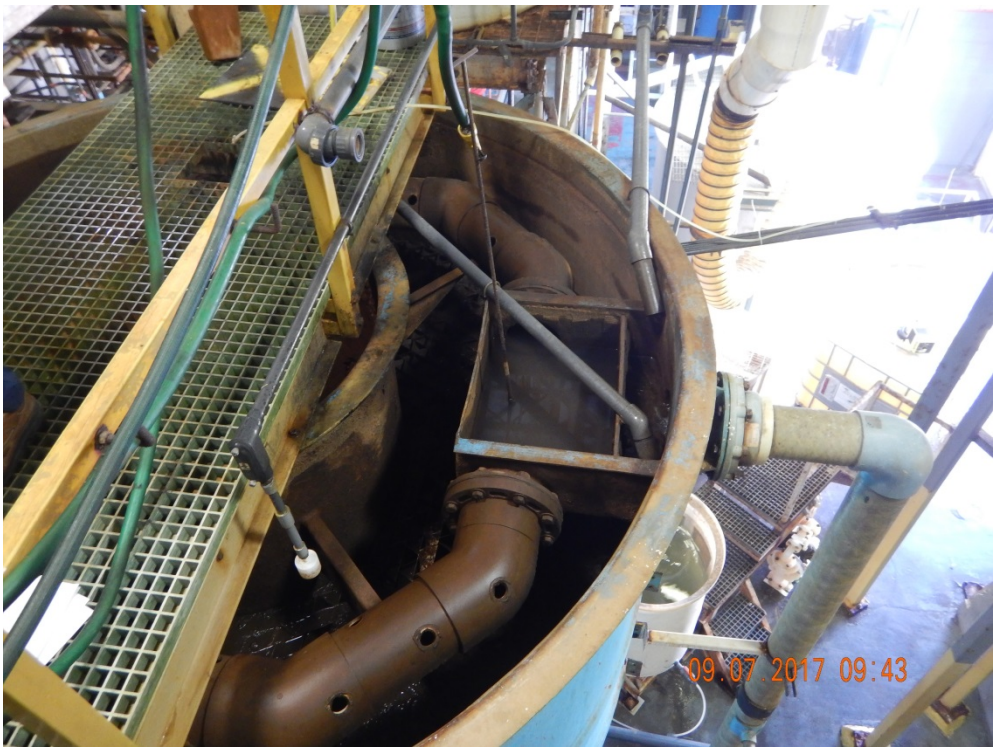
PPETS WENDB DATA ELEMENTS

| | | |
|---|---|---|
| NUMBER OF SIGNIFICANT IUS (SIUS): | **10** | SIUS |
| NUMBER OF CATEGORICAL IUS: | **3** | CIUS |
| SIUS NOT SAMPLED OR INSPECTED BY POTW: | **0** | NOIN |
| SIUS WITHOUT CONTROL MECHANISM: | **0** | NOCM |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING: | **1** | PSNC |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS: | **1** | MSNC |
| SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW: | **0** | SNIN |

| Water Division Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac. – Bekaert Corporation** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **0938** |
| Witness: | | | | Photo #: | **1** |
| Description: | **10,000 gallon holding tank that receives wastewater from ISC lines.** | | | | |

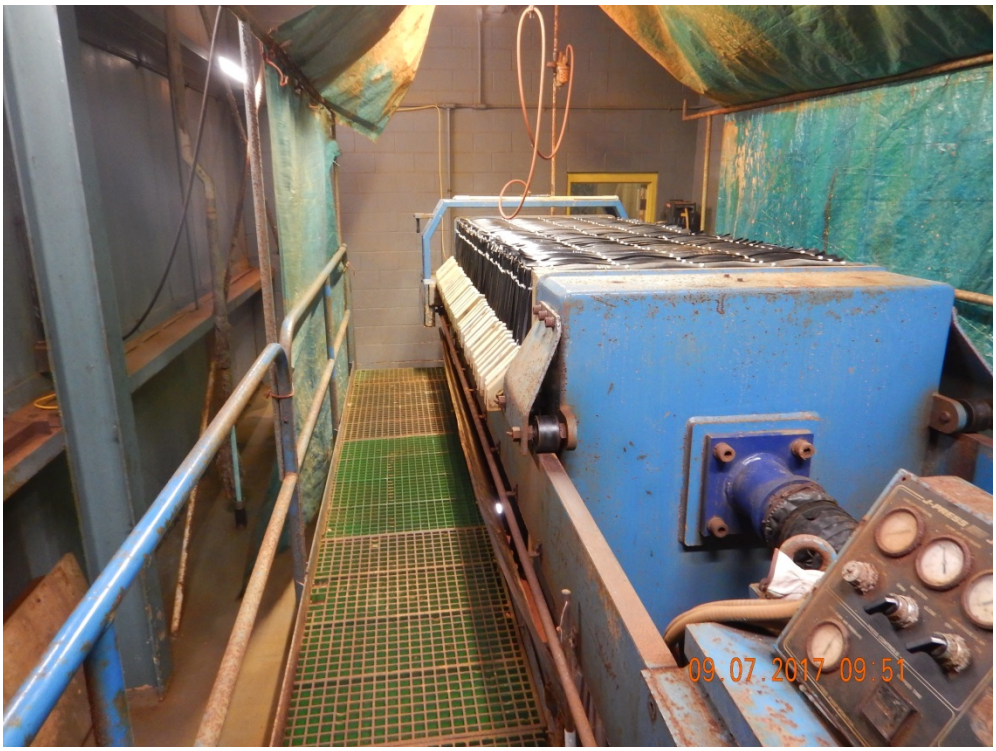

| | | | | | |
|---|---|---|---|---|---|
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **09:38** |
| Witness: | | | | Photo #: | **2** |
| Description: | **3,300 gallon pH/adjustment/neutralization tank w/ auto-fed hydrated lime for Copper and Zinc removal.** | | | | |

| Water Division Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac.** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **09:43** |
| Witness: | | | | Photo #: | **3** |
| Description: | **6,000 gallon clarifier.** | | | | |




| | | | | | |
|---|---|---|---|---|---|
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **09:45** |
| Witness: | | | | Photo #: | **4** |
| Description: | **Influent flow into the clarifier.** | | | | |

| Water Division Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac.** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **09:51** |
| Witness: | | | | Photo #: | **5** |
| Description: | **Filter press system.** | | | | |

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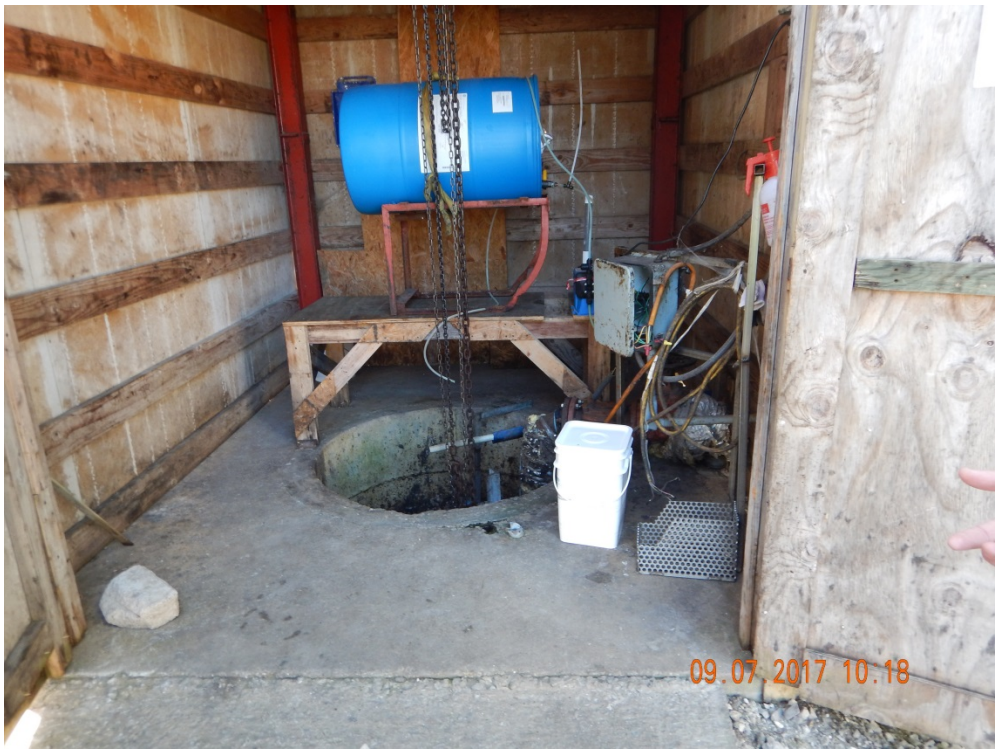
|---|---|---|---|---|---|
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **09:52** |
| Witness: | | | | Photo #: | **6** |
| Description: | **Hydrated lime tank (left) and polymer drip tank (right, dripped into clarifier).** | | | | |

| Water Division Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac.** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **09:55** |
| Witness: | | | | Photo #: | **7** |
| Description: | **Polymer tank that is mixed into piping that flows to clarifier.** | | | | |

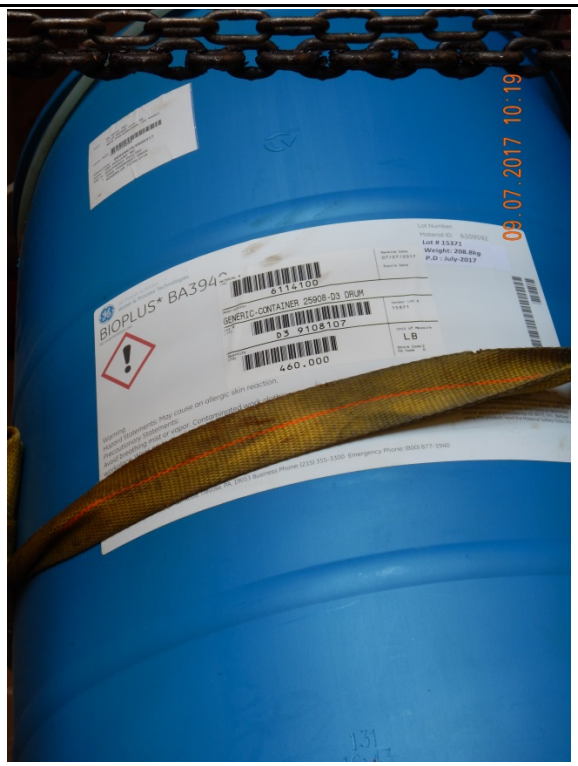

| | | | | | |
|---|---|---|---|---|---|
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **09:58** |
| Witness: | | | | Photo #: | **8** |
| Description: | **Final effluent from the facility.** | | | | |

| Water Division Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac. – Southeast Poultry, Inc.** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:18** |
| Witness: | | | | Photo #: | **9** |
| Description: | **Wastewater wet well with dry bacteria additive.** | | | | |



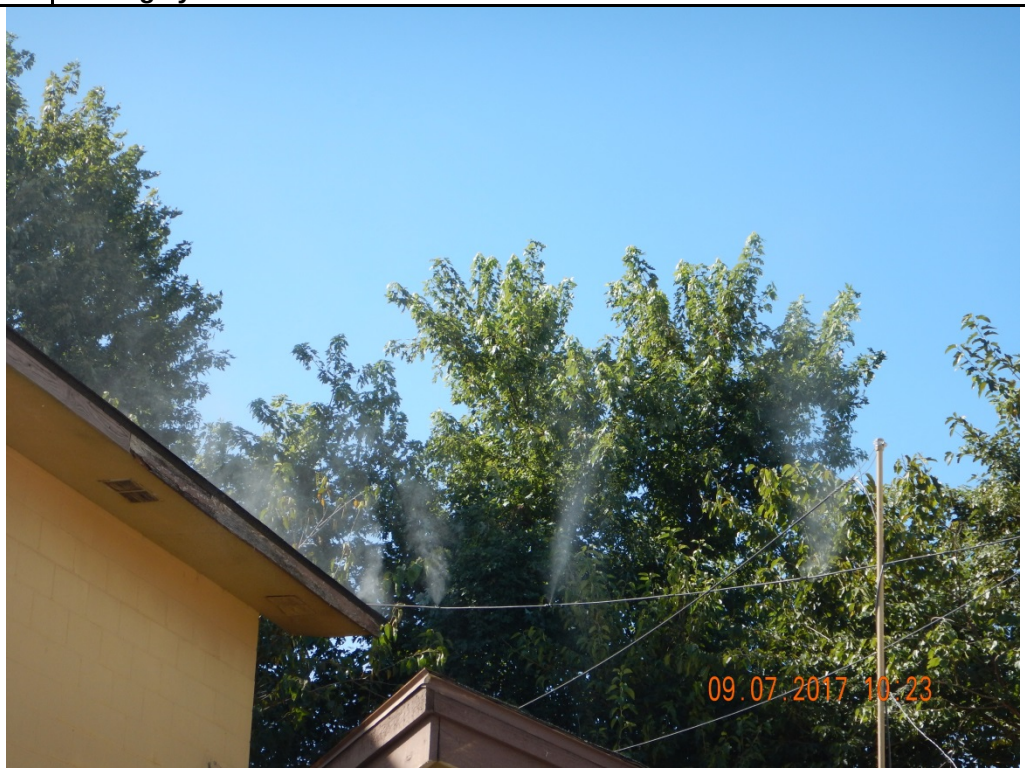

| | | | | | |
|---|---|---|---|---|---|
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:19** |
| Witness: | | | | Photo #: | **10** |
| Description: | **Closer view of wet well.** | | | | |

| Water Division Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac.** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:19** |
| Witness: | | | | Photo #: | **11** |
| Description: | **Bacteria additive** | | | | |




| | | | | | |
|---|---|---|---|---|---|
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:22** |
| Witness: | | | | Photo #: | **12** |
| Description: | **80,000 gallon EQ tank.** | | | | |

| Water Division Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac.** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:23** |
| Witness: | | | | Photo #: | **13** |
| Description: | **Misting system to reduce noxious odors.** | | | | |




| | | | | | |
|---|---|---|---|---|---|
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:29** |
| Witness: | | | | Photo #: | **14** |
| Description: | **DAF unit with skimmer arms.** | | | | |

| **Water Division Photographic Evidence Sheet** | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac.** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:29** |
| Witness: | | | | Photo #: | **15** |
| Description: | **DAF unit and water discharge.** | | | | |


| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:31** |
|---|---|---|---|---|---|
| Witness: | | | | Photo #: | **16** |
| Description: | **Discharge from DAF unit.** | | | | |

| Water Division Photographic Evidence Sheet | | | | | |
|---|---|---|---|---|---|
| Location: | **Rogers Pollution Control Fac.** | | | | |
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:31** |
| Witness: | | | | Photo #: | **17** |
| Description: | **Partial flume and effluent to the city sewer system.** | | | | |


| | | | | | |
|---|---|---|---|---|---|
| Photographer: | **Jason Bolenbaugh** | Date: | **9/7/2017** | Time: | **10:33** |
| Witness: | | | | Photo #: | **18** |
| Description: | **Flow meter with a flow rate of 50.5 gallons per minute.** | | | | |