

May 9, 2019

Brent R Dobler, Utility Supervisor City of Rogers 4300 Rainbow Rd. Rogers, AR 72758

RE: Rogers Pollution Control Fac. Inspection

AFIN: 04-00155 Permit No.: AR0043397

Dear Mr. Dobler:

On April 3, 2019, I performed a Compliance Evaluation 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 report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance 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 May 24, 2019.

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

Sincerely,

Garrett Grimes

District 1 Field Inspector Office of Water Quality

James Drimas

	inspection Report. Roge	#15 I	-onution Contr	01 Fac., AFIN. 04-0	013	3 , Permit	#. AK	004338) (
	ADEO		F WATER QUALITY INSPECTION REPORT						
=		AF	IN: 04-00155	PERMIT #: AR0043	3397	7	[DATE:	4/3/2019
A Dei	R K A N S A S partment of Environmental Quality	CC	OUNTY: 04 Ben	ton	PD	S #: 1077	27		MEDIA: WN
וטסו	Sartinent of Environmental Quanty	GF	PS LAT: 36.297 9	37 LONG: -94.212	2331	LOCATI	ON: E	ntranc	e
	FACILITY INFORMAT	ION		IN	SPE	ECTION II	NFORI	MATIO	N
	EI Igers Pollution Control Fac.			1 - Municipal	10	D4111 S -			
43	00 Rainbow Road			3 - Satisfactory			Com		Evaluation
CITY:	gers			DATE(S): EN	NTRY TI		IME:		FFECTIVE DATE:
NO	RESPONSIBLE OFFI			4/3/2019 0	9:30	0 13:0	00	1/31/2	
NAMI	RESPONSIBLE OFFICE: / TITLE	JIAL	-					PERMIT E.	XPIRATION DATE:
COM	ent R Dobler / Utility Supervisor			FAYETTEVILLE	SH	ALE REL	ATED:	N	
	ry of Rogers ING ADDRESS:			FAYETTEVILLE	SH	ALE VIOL	ATIOI	NS: N	-
	00 Rainbow Rd.			IN:	SPE	CTION P	ARTIC	IPANT	S
	STATE, ZIP:			Todd Beaver, P			r City	of Roc	ners:
	gers AR 72758 NE & EXT: / FAX:			David Staib, Op					
	9-273-7378 /			Garrett Grimes,					
EMAI	Ŀ								
CC	NTACTED DURING INSPECTION	: No							
				ALUATIONS					
**	PERMIT (s=s	atisfac	FLOW MEASU	satisfactory, N=Not Applicable IRFMENT			RMWA	TER	
**	RECORDS/REPORTS	**	LABORATOR					SITE RE	VIEW
**	OPERATION & MAINTENANCE	**		ECEIVING WATER					NG PROGRAM
**	SAMPLING	**	SLUDGE HAN	IDLING/DISPOSAL		** PRET	REAT	MENT	
**	OTHER:								
	- falles in a falletina and a la			OF FINDINGS					
ın	e following violations were noted	dui	ing the inspec	tion:					
	Discharges with Total Resid are violations of Part I, Secti		• •	_	urre	ed in Marc	h and	l April 2	2018. These
	2. Excessive scum was observed in Clarifier #4, Clarifier #2, and BNR Train #1 (Photos #1 - #4). Mr. Beaver and Mr. Staib stated that enzymes were previously added to Train #1 in an attempt to control the scum. According to Mr. Beaver and Mr. Staib, the facility's ability to treat wastewater has not been impacted, but there were issues with odor control. However, the scum was negatively impacting the function of a Clarifier #4 pump. In addition, scum was observed accumulating on the baffle in Clarifier #2 and impacting flow (Photo #5). These are violations of Part III, Section B.1.a of the permit.								
			GENERAL	COMMENTS					
	2	,	1-	*					
INS	SPECTOR'S SIGNATURE:	en	The flee	Garrett Gri	imes	S		DATE	: 5/3/2019

Jason Bolenbaugh

SUPERVISOR'S SIGNATURE:

DATE: 5/8/2019

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS DM DU DNA DNE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y □N □NA □NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□Y □N ☑NA □NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:	MY ON ONA ONE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S □M □U □NA □NE
DETAILS:	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
a. DATES AND TIME(S) OF SAMPLING:	☑Y □N □NA □NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y □N □NA □NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y □N □NA □NE
e. RESULTS OF CALIBRATIONS:	☑Y □N □NA □NE
f. RESULTS OF ANALYSES:	☑Y □N □NA □NE
g. DATES AND TIMES OF ANALYSES:	☑Y □N □NA □NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	⊠s □m □u □na □ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	⊠s □m □u □na □ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	⊠y □n □na □ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S ØM □U □NA □NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	□S □M ☑U □NA □NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	□S □M ☑U □NA □NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	⊠s □m □u □na □ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: SCADA	⊠s □m □u □na □ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	⊠s □m □u □na □ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: Todd Class III David Class IV	⊠s □m □u □na □ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: Software database	⊠s □m □u □na □ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: <u>In library</u>	□Y □N □NA ☑NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: In files	□Y □N □NA ☑NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y □N □NA □NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: In colle system	ction ☑Y ☐N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☑Y □N □NA □NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	□Y □N □NA ☑NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□Y ☑N □NA □NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE

SECTION D: SAMPLING		
PERMITTEE SAMPLING M	EETS PERMIT REQUIREMENTS	ØS □M □U □NA □NE
DETAILS:		
1. SAMPLES TAKEN AT SITE(S) SPECI	IFIED IN PERMIT:	Øy □n □na □ne
2. LOCATIONS ADEQUATE FOR REPR	RESENTATIVE SAMPLES:	ØY □N □NA □NE
3. FLOW PROPORTIONED SAMPLES (OBTAINED WHEN REQUIRED BY PERMIT:	ØY □N □NA □NE
4. SAMPLING AND ANALYSES COMPL	ETED ON PARAMETERS SPECIFIED IN PERMIT:	ØY □N □NA □NE
5. SAMPLING AND ANALYSES PERFO	RMED AT FREQUENCY SPECIFIED IN PERMIT:	ØY □N □NA □NE
6. SAMPLE COLLECTION PROCEDURI	ES ADEQUATE:	Øy □n □na □ne
a. SAMPLES REFRIGERATED DURING	COMPOSITING:	ØY □N □NA □NE
b. PROPER PRESERVATION TECHNIC	QUES USED:	Øy □n □na □ne
c. CONTAINERS AND SAMPLE HOLDIN	NG TIMES CONFORM TO 40 CFR 136:	Øy □n □na □ne
7. IF MONITORING IS PERFORMED MO	ORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☑Y □N □NA □NE
SECTION E: FLOW MEASUR	REMENT	
PERMITTEE FLOW MEASU	JREMENT MEETS PERMIT REQUIREMENTS	⊠S □M □U □NA □NE
DETAILS:		
1. PRIMARY FLOW MEASUREMENT DI (Outfall 001) Macrometer In-line meter (Out	EVICE PROPERLY INSTALLED AND MAINTAINED: <u>5'</u> TYPE OF DEVICE: <u>Parshall flume</u> Ifall 002)	Øy □n □na □ne
2. FLOW MEASURED AT EACH OUTFA		☑Y □N □NA □NE
3. SECONDARY INSTRUMENTS (TOTA	ALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	⊠y □n □na □ne
4. CALIBRATION FREQUENCY ADEQU	JATE: <u>10-3-2018</u>	⊠y □n □na □ne
5. RECORDS MAINTAINED OF CALIBR	ATION PROCEDURES:	⊠y □n □na □ne
6. CALIBRATION CHECKS DONE TO A	SSURE CONTINUED COMPLIANCE:	Øy □n □na □ne
7. FLOW ENTERING DEVICE WELL DIS	STRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8. FLOW MEASUREMENT EQUIPMENT	T ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	ØY □N □NA □NE
9. HEAD MEASURED AT PROPER LOC	CATION:	ØY □N □NA □NE
SECTION F: LABORATORY		
PERMITTEE LABORATOR	Y PROCEDURES MEET PERMIT REQUIREMENTS	⊠S □M □U □NA □NE
DETAILS:		
1. EPA APPROVED ANALYTICAL PROC	CEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES):	⊠y □n □na □ne
2. IF ALTERNATIVE ANALYTICAL PRO	CEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	□y □n ☑na □ne
3. SATISFACTORY CALIBRATION AND	MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	⊠y □n □na □ne
4. QUALITY CONTROL PROCEDURES	ADEQUATE:	☑Y □N □NA □NE
5. DUPLICATE SAMPLES ARE ANALYZ	ZED ≥10% OF THE TIME: CBOD5 bench sheet	⊠y □n □na □ne
6. SPIKED SAMPLES ARE ANALYZED	≥10% OF THE TIME: CBOD5 bench sheet	⊠y □n □na □ne
7. COMMERCIAL LABORATORY USED):	⊠y □n □na □ne
a. LAB NAME: Huther & Associates, Ir	<u>nc.</u>	
b. LAB ADDRESS: 1156 North Bonnie	Brae, Denton, Texas 76201	
c. PARAMETERS PERFORMED: WET	Testing	
8. BIOMONITORING PROCEDURES AD	DEQUATE:	☑Y □N □NA □NE
a. PROPER ORGANISMS USED:		☑Y □N □NA □NE
b. PROPER DILUTION SERIES FOLLO	WED:	☑y □n □na □ne
c. PROPER TEST METHODS AND DUF	RATION:	☑Y □N □NA □NE
d. RETESTS AND/OR TRE PERFORME	D AS REQUIRED:	□y □n ☑na □ne

SECTION C	: EFFLUENT/R				74-00155, Permit #	. ANUU43391					
				ATIONS	T	де пи г	IU □NA □NE				
	N VISUAL OBS	ERVATIONS C	JINL Y			M2 LIM L	IU LINA LINE				
DETAILS:	T	Τ	T	1	I	T	T				
OUTFALL #:											
001	None	None	None	Trace	None	Clear					
002	None	None	None	Trace	None	Clear					
	I: SLUDGE DIS										
	DISPOSAL MEI	ETS PERMIT F	REQUIREMEN	TS		⊠S □M □	IU □NA □NE				
DETAILS:											
	IANAGEMENT ADEQU						□U □NA □NE				
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40) CFR 503:			⊠s □m	□U □NA □NE				
3. FOR LAND	APPLIED SLUDGE, T	YPE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE): S	old privately as Class	<u>s A.</u>				
	SAMPLING IN				T						
	RESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ØNA □NE				
DETAILS:											
	OBTAINED THIS INSP					□Y	□N ☑NA □NE				
2. TYPE OF S	SAMPLE: GRAB:	COMPOSITE: N	METHOD: FREQUE	ENCY:							
3. SAMPLES	PRESERVED:						□N ☑NA □NE				
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:					□N ☑NA □NE				
5. SAMPLE O	BTAINED FROM FACI	LITY'S SAMPLING DE\	/ICE:				□N ☑NA □NE				
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:				□N ☑NA □NE				
7. SAMPLE S	PLIT WITH PERMITTE	E:					□n ☑na □ne				
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:					□N ☑NA □NE				
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			□Y	□N ☑NA □NE				
	: STORM WAT										
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	5		U ⊠NA □NE				
DETAILS:											
1. SWPPP UF	PDATED AS NEEDED:_	_ DATE OF LAST UP	DATE:				□N ☑NA □NE				
2. SITE MAP	INCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:				□N ☑NA □NE				
3. POLLUTIO	N PREVENTION TEAM	I IDENTIFIED:				□Y	□n ☑na □ne				
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED):				□n ☑na □ne				
5. LIST OF PO	OTENTIAL POLLUTAN	T SOURCES:					□N ☑NA □NE				
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:			□Y	□N ☑NA □NE				
7. ALL NON-S	STORM WATER DISCH	ARGES ARE AUTHOR	IZED:			□Y	□N ☑NA □NE				
8. LIST OF ST	TRUCTURAL BMPS:					□Y	□n ☑na □ne				
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				□Y	□N ☑NA □NE				
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:				□Y	□N ØNA □NE				
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				□Y	□N ØNA □NE				
I											

		FLOW (CALCUL	ATION	SHEE	T (Outfall	001)			
Date: 4/3	3/2019	Tir	me: 11:	05						
Head in Ind	Head in Inches: 8.4" Feet: 0.7									
Type & Siz	Type & Size of Primary Flow Measurement Device: 5' Parshall Flume									
Name & M	odel of Seco	ndary F	low Mea	sureme	ent De	vice: Gr	eyline (SLT 5.0		
Date of las	t Calibration	of Seco	ondary F	low De	vice:	10-3-18				
	Flow at Date		· ·		1	MGD		(Facility Flow Meter)		
	Flow at Date					4 MGD				
(Flow is calcula	ted using flow ch	arts in: IS0	CO Open C	hannel Flo	w Meas	urement Hand	book-5 th l	Edition)		
% Error =	Recorded		- Cald	culated ue	Value	X 100				
	C 77			7.04						
% Error =	6.77		- 7.34	7.34		X 100				
			7.01	T						
% Error =	-0.57		X 100							
	7.34									
% Error =	-0.07	8	X 100							
% Error =	7.8		%							
Comments	.									
3011111101110	•									

Inspection Report: Rogers Pollution Control Fac., AFIN: 04-00155, Permit #: AR0043397 FLOW CALCULATION SHEET (Outfall 002)

Date:	4/3/2019	Time: 11:05	
Head in	Inches:	Feet:	
T. 10 0 0 0	Cina of Duimanu. F	Tow Managemant Da	Davisar In line
Type & 3	Size of Primary F	Flow Measurement De	Device: in-line
Name &	Model of Secon	dary Flow Measureme	ment Device: Macrometer
rianic a	WOODER OF OCCOUNT	dary i low wicasarcine	TICHE DOVICE. INICOLOMICION
Date of I	last Calibration o	f Secondary Flow Dev	evice:
		•	
Recorde	ed Flow at Date 8	Time Listed Above:	: (Facility Flow Meter)
0.1.1.1	. I El (D . (.	O T' I ' . (. I AI	. 1
		& Time Listed Above:	
(Flow is call	culated using flow char	ts in: <u>1800 Open Channel Flo</u>	Flow Measurement Handbook-5 th Edition)
a. =	Recorded V	alue - Calculated	d Value
% Error	= (Calculated Value	X 100
% Error		-	X 100
% E1101	=		X 100
% Error	_	X 100	
70 21101		7. 100	
0/ [===================================		V 400	
% Error	=	X 100	
% Error	_	%	
70 21101	_	70	
Comme	nts: In-line dev	vice	

Inspection Report: Rogers Pollution Control Fac., AFIN: 04-00155, Permit #: AR0043397 DMR Calculation Check (Outfall 001)

Reporting Period:	From	m <u>2017</u>	04	01	_ To _	2017	04	30
		Year	Month	Day		Year	Month	Day
Parameter Checked:		TSS	_					

	Loading	Concentration				
	Mass	Monthly				
	Mo. Avg Ibs/day	Mo. Avg mg/l	7-day Avg mg/l			
Reported Value:	226	1.6	4			
Calculated Value:	226	1.6	NA			
Permit Value:	2335	20	30			

If calculated value does not equal reported value, explain:

Reported value for 7-day average appears to be from the final week of March 2017.

Inspection Report: Rogers Pollution Control Fac., AFIN: 04-00155, Permit #: AR0043397 DMR Calculation Check (Outfall 002)

1

2019

To

2

28

2

2019

From

-	Year	Month	Day	Year	Month	Day
Parameter Checked:	CBOD5					
	Loading Mass				ntration	
	Mo. Avg lbs/d	ay	Mo. Avg.		7-day Avg	j mg/l
Reported Value:	NA		1.6	<u> </u>	NA	*
Calculated Value:	NA		1.6	<u> </u>	NA	1
Permit Value:	NA		10		15	

If calculated value does not equal reported value, explain:

Reporting Period:

^{*}Discharge only occurred on the 25-28th. 7-day average incorporated into March 2019 DMR. This is noted on Roger's February DMR.

Coation: Rogers Pollution Control Fac. Photographer: Garrett Grimes, District 1 Inspector Date: 4/3/2019 Time: 10:11 Witness: Photo #: 1

Description: **Excessive scum on the surface of Clarifier #4.**



Photographer:	Garrett Grimes, District 1 Inspector	Date:	4/3/2019	Time:	10:33
Witness:				Photo #	: 2

Description: Excessive scum on the surface of Clarifier #2. Scum amount was lower on Clarifier #1 compared to #4.



Office of Water Quality Photographic Evidence Sheet Location: Rogers Pollution Control Fac. Photographer: Garrett Grimes, District 1 Inspector Date: 4/3/2019 Time: 10:17 Witness: Photo #: 3

Description: Excessive scum on the surface of BNR Train #1.

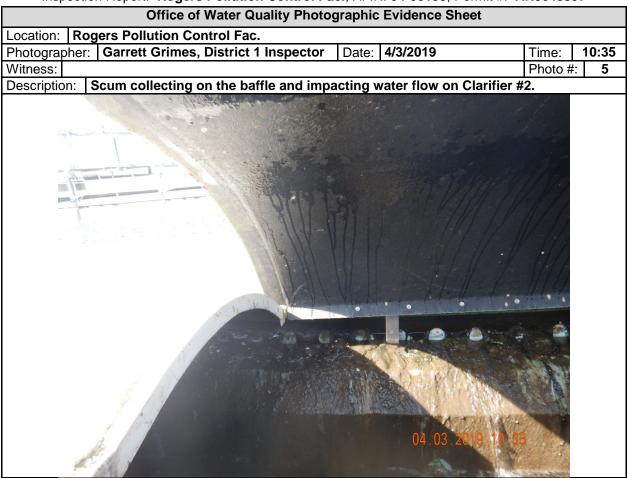


Photographer:	Garrett Grimes, District 1 Inspector	Date:	4/3/2019	Time:	10:21
Witness:				Photo #:	4

Description: Continued from Photo #3.



Inspection Report: Rogers Pollution Control Fac., AFIN: 04-00155, Permit #: AR0043397





August 29, 2019

Brent R Dobler, Utility Supervisor City of Rogers 4300 Rainbow Rd. Rogers, AR 72758

RE: Adequate Response to Compliance Evaluation Inspection

AFIN: 04-00155 Permit No.: AR0043397

Dear Mr. Dobler:

The Department has received your May 29, 2019, response to the Compliance Evaluation Inspection conducted on April 3, 2019. Your response and the details discussed during a June 25, 2019, site visit adequately address the requests in the Summary of Findings section of the report. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

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 Office of Water Quality