

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 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 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

Zamo Dumas

		OFFICE OF WATER QUALITY INSPECTION						
ADEQ		REPORT						
A R K A N S A S Department of Environmental Quality		AFIN: 04-00155 PERMIT #: AR0043397				DATE: 4/3/2019		
		COUNTY: 04 Bento	n	PDS #: 10772			MEDIA: WN	
	•	GPS LAT: 36.29793					intrance	
NIA NAT	FACILITY INFORMAT	ION			TION INFO	RMATIO	N	
Rogers Pollution Control Fac.			FACILITY TYPE: 1 - Municipal					
4300 Rainbow Road			FACILITY EVALUATION RATING: INSPECTION TYPE: SSO/Collection System					
Ro	gers		DATE(S): ENTRY TIME: EXIT TIME: PERMIT EFFECTIVE DATE: 1/31/2006 PERMIT EXPIRATION DATE:			-		
	RESPONSIBLE OFFIC	CIAL						
	ent R. Dobler / Utility Supervisor							
COMP	ANY:		FAYETTEVILLE	SHALI	E RELATEI	D: N		
	y of Rogers NG ADDRESS:		FAYETTEVILLE	SHALI	E VIOLATIO	ONS: N		
4300 Rainbow Rd.			INSPECTION PARTICIPANTS					
	state, zip: gers AR 72758		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Johnny Lunsford, Sewer Manager, City of Rogers;					
PHON	E & EXT: / FAX:		Mark Lanvis, Telemetry & SCADA Technician, City of					
4/S)-273-7378 /		Rogers;					
EWAIL.			Garrett Grimes, District 1 Inspector, ADEQ					
CONTACTED DURING INSPECTION: No								
	(S=S:	AREA EVA atisfactory, M=Marginal, U=Unsati		Evaluated))			
**	PERMIT	** FLOW MEASUR	REMENT	**	STORMW			
**	RECORDS/REPORTS	** LABORATORY		**	FACILITY			
**	OPERATION & MAINTENANCE SAMPLING		CEIVING WATER LING/DISPOSAL	**	SELF-MO PRETREA		NITORING PROGRAM	
**	OTHER:	SLODGE HAND	LING/DISPOSAL		PREIRE	A I IVICIN I		
	OTTIET.	SUMMARY C	F FINDINGS					
Th	e following violation of Part III, Se	ection B.1 of the perr	nit noted during	the ins	spection:			
	Emergency contact informat			S.				
GENERAL COMMENTS								
INS	SPECTOR'S SIGNATURE:	Garrett Gri	mes		DATE	E: 5/2/2019		
_	Jan	on Rabball						
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh					DATE	: 5/8/2019		

COLLECTION SYSTEM INSPECTION AND OVERALL RAT	ING	ØS □M □U □NA □NE					
PROVIDE A BRIEF DESCRIPTION OF THE COLLECTION SYSTEM:							
POPULATION SERVED/NUMBER OF RESIDENTIAL AND COMMERCIAL CONNECTIONS: ~55K, Residential= 25K, Commercial=2840							
FEET OF SEWER SYSTEM: 1,684,000 gravity and 176,880 force main.							
AGE OF SYSTEM: Oldest in 1960's							
DOES THE SYSTEM EXPERIENCE PROBLEMS DURING DRY OR WET WEATHER (EXPLAIN): 1&I, some overflows							
IS THERE A SYSTEM IN PLACE FOR REPORTING SSOS Overflow report sent to ADEQ and reported on the DMR I		⊠Y □N □NA □NE					
ARE ALL SSOs REPORTED REGARDLESS OF SIZE:	☑Y □N □NA □NE						
HAVE SSOs REACHED "WATERS OF THE STATE" (LIST DEACH): 10/2018: 600 gallons to unnamed trib. of Osage (⊠Y □N □NA □NE						
LACITY. 10/2010. 000 Yallotis to utilialited trib. Of Osage Cleek							
PUMP STATIONS		ØS □M □U □NA □NE					
NUMBER OF PUMP STATIONS IN SYSTEM: 104	NUMBER WITH BACKUP PC	WER: <u>1</u>					
HOW OFTEN ARE PUMP STATIONS INSPECTED/MONITORED: once per month							
ARE MAINTENANCE RECORDS AND/OR OPERATOR LOGS KEPT: Not for inspections, records of maintenance kept							
ADEQUATE INVENTORY OF SPARE PARTS: Storage shed for lift station parts							
TYPE OF REMOTE ELECTRONIC MONITORING USED (I.E. SCADA OR AUTO DIALERS): SCADA							
BRIEF SUMMARY OF EMERGENCY PROCEDURES: <u>Identify the problem, on-call responder, identify solution.</u> Backup generator for emergency power.							
NUMBER OF PUMP STATIONS VISITED DURING INSPECTION (SEE ATTACHED CHECKLISTS FOR EACH):							
SATELLITE SYSTEMS		□S □M □U ØNA □NE					
DOES THE COLLECTION SYSTEM RECEIVE FLOW FROM SATELLITE SYSTEMS: No							
TYPE(S) OF WASTE WATER RECEIVED:							
BRIEFLY DESCRIBE THE SATELLITE SYSTEM:							
ANY KNOWN PROBLEMS WITH SATELLITE SYSTEM:							
NAME, ADDRESS AND PHONE NUMBER OF PERSON RESPONSIBLE FOR SATELLITE SYSTEM:							

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)						
GENERAL INFORMATION AND OVERALL EVALUATION	⊠S □M □U □NA					
NAME AND/OR LOCATION OF PUMP STATION: Camden Way						
TYPE(S) OF WASTE WATER RECEIVED: ☑RESIDENTIAL □COMMERCIAL □INDUSTRIAL □OTHER:						
NUMBER OF PUMPS: 2	NUMBER OPERATIONAL: 2					
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: 5	h <u>p</u>	☑S □M □U □NA □NE				
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y ☑N □NA □NE				
GENERAL OPERATION AND MAINTENANCE		⊠S □M □U □NA				
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAG EQUIPMENT:		⊠S □M □U □NA □NE				
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		⊠S □M □U □NA □NE				
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:		⊠S □M □U □NA □NE				
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIP INSTALLED AND MAINTAINED:	-	⊠S □M □U □NA □NE				
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUENCIES DRIVESHAFTS, ETC.):	JIPMENT (BELTS, PULLEYS,	☑S □M □U □NA □NE				
ADEQUATE VENTILATION TO PREVENT EXCESSIVE COL GASES AND FUMES:	NDENSATION AND/OR	⊠S □M □U □NA □NE				
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE:	☑S □M □U □NA □NE				
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	☑S □M □U □NA □NE				
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	VET WELLS:	☑S □M □U □NA □NE				
BACKUP POWER AND ALARMS		⊠S □M □U □NA				
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T		☑S □M □U □NA □NE				
AUDIBLE/VISUAL ALARM WITH <u>EMERGENCY CONTACT</u> <u>signs</u>	<u> </u>	□S ØM □U □NA □NE				
SCADA SYSTEM (LIST PARAMETERS MONITORED): <u>Lev</u> <u>backup</u>	el, pump, on/off, seal fail,	☑Y □N □NA □NE				

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)						
GENERAL INFORMATION AND OVERALL EVALUATION	⊠S □M □U □NA					
NAME AND/OR LOCATION OF PUMP STATION: <u>Dixieland Crossing</u>						
TYPE(S) OF WASTE WATER RECEIVED: MRESIDENTIAL COMMERCIAL CINDUSTRIAL COTHER:						
NUMBER OF PUMPS: 2	NUMBER OPERATIONAL: 2					
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: 5	☑S □M □U □NA □NE					
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y ØN □NA □NE				
GENERAL OPERATION AND MAINTENANCE		ØS □M □U □NA				
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAG EQUIPMENT:	ØS □M □U □NA □NE					
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:	⊠S □M □U □NA □NE					
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:	⊠S □M □U □NA □NE					
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIP INSTALLED AND MAINTAINED:	☑S □M □U □NA □NE					
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUENTIES DRIVESHAFTS, ETC.):	☑S □M □U □NA □NE					
ADEQUATE VENTILATION TO PREVENT EXCESSIVE COI GASES AND FUMES:	NDENSATION AND/OR	☑S □M □U □NA □NE				
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE:	ØS □M □U □NA □NE				
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	ØS □M □U □NA □NE				
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	VET WELLS:	☑S □M □U □NA □NE				
·						
BACKUP POWER AND ALARMS		⊠S □M □U □NA				
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T	RANSFER PUMP:	☑S □M □U □NA □NE				
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT	INFORMATION POSTED: No	□S ØM □U □NA □NE				
SCADA SYSTEM (LIST PARAMETERS MONITORED): <u>leve</u> <u>backup</u>	el, pump, on/off, seal fail,	ØY □N □NA □NE				

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)						
GENERAL INFORMATION AND OVERALL EVALUATION	⊠S □M □U □NA					
NAME AND/OR LOCATION OF PUMP STATION: Lost Springs						
TYPE(S) OF WASTE WATER RECEIVED: MRESIDENTIAL MCOMMERCIAL MINDUSTRIAL MOTHER:						
NUMBER OF PUMPS: 2						
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: 7	. <u>5hp</u>	☑S □M □U □NA □NE				
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y ☑N □NA □NE				
GENERAL OPERATION AND MAINTENANCE		ØS □M □U □NA				
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAG EQUIPMENT:	☑S □M □U □NA □NE					
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:	⊠S □M □U □NA □NE					
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:	☑S □M □U □NA □NE					
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPINSTALLED AND MAINTAINED:	ØS □M □U □NA □NE					
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUENCIAL DRIVESHAFTS, ETC.):	JIPMENT (BELTS, PULLEYS,	☑S □M □U □NA □NE				
ADEQUATE VENTILATION TO PREVENT EXCESSIVE COI GASES AND FUMES:	NDENSATION AND/OR	ØS □M □U □NA □NE				
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE:	☑S □M □U □NA □NE				
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	☑S □M □U □NA □NE				
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	☑S □M □U □NA □NE					
BACKUP POWER AND ALARMS		⊠S □M □U □NA				
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T	RANSFER PUMP:	☑S □M □U □NA □NE				
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT	NFORMATION POSTED: No	□S ☑M □U □NA □NE				
SCADA SYSTEM (LIST PARAMETERS MONITORED): <u>leve</u> <u>backup</u>	el, pump, on/off, seal fail,	⊠Y □N □NA □NE				

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

Office of Water Quality Photographic Evidence Sheet							
Location: Rogers Pollution Control Fac.							
Photographer: Garrett Grimes, District 1 Inspector Date: 4/3/2019 Time: 14:27							
Witness:					Photo #	t: 1	
Description I lift station automas Cinn with amangan as a stat information is not needed							



Photographer	Garrett Grimes, District 1 Inspector	Date:	4/3/2019	Time:	14:35	
Witness:					: 2	
Description: Lift station entrance. Sign with emergency contact information is not posted.						





May 20, 2019

Mr. Garrett Grimes
ADEQ
Office of Water Quality Compliance Branch
5301 Northshore Dr
North Little Rock, AR 72118-5317

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

Dear Mr. Grimes:

Please accept this letter as the required response to your findings detailed in your May 9, 2019 letter. These findings were 1. Emergency contact information was not posted at the lift stations. These are violations of Part III, Section B.1. of the permit.

We do not have a Part III, Section B.1. in our permit. However, after clarification via phone, the intent was Part II same section. A response to that follows.

All of our lift stations are continuously monitored around the clock. The Rogers Water Utilities SCADA system monitors the following on all lift stations: pump failures, motor overloads, pump seal fails, loss of A/C power, phase loss, wetwell levels, backup battery levels, information packets exchanged, and temperatures within the instrumentation panel. If any of these values exceed parameters, an alarm is initiated and sent via WIN-911 software to a designated on-call field technician with a smart phone, as well as their manager. If the issue cannot be handled via the SCADA system, or if the SCADA system is unable to communicate with the site, a field technician is dispatched to get a visual on the lift station.

We will always be made aware of any issues with any of our lift stations well before the general public would be able to see anything wrong with our facility. Of course, if there were some other kind of issue that occurred on our lift station property, we believe it would be due to a circumstance that would warrant a 911 call, not a call to RWU.

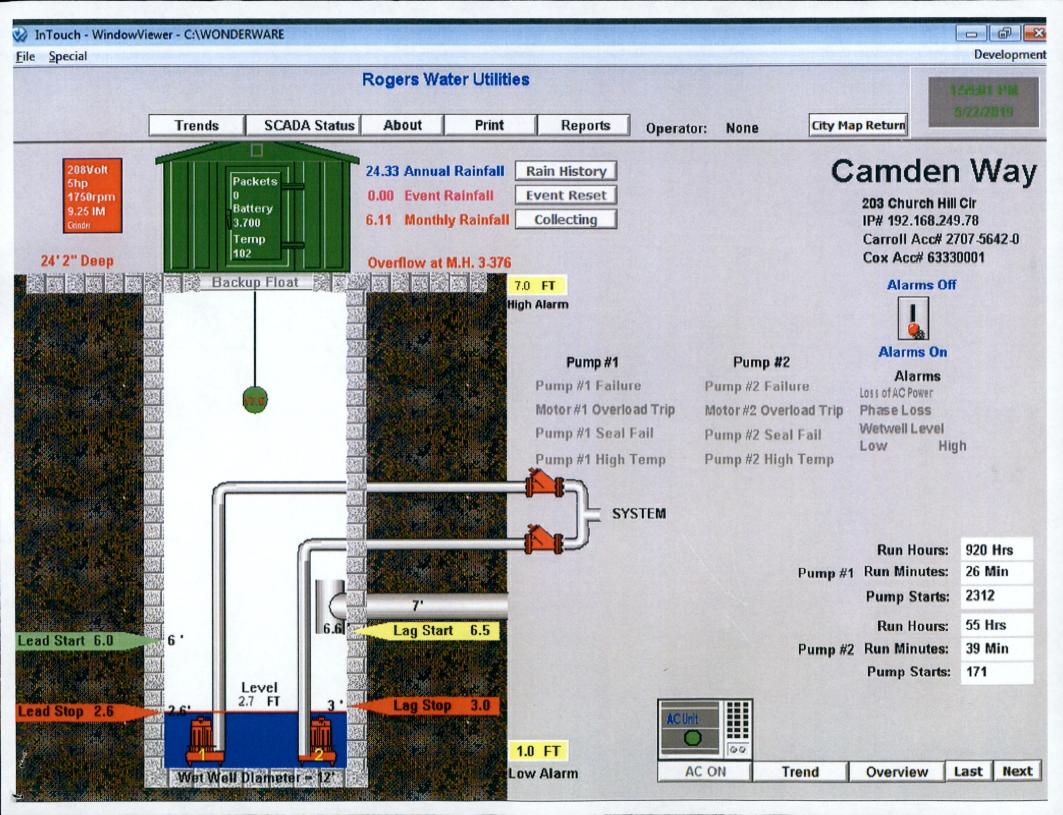
Sincerely

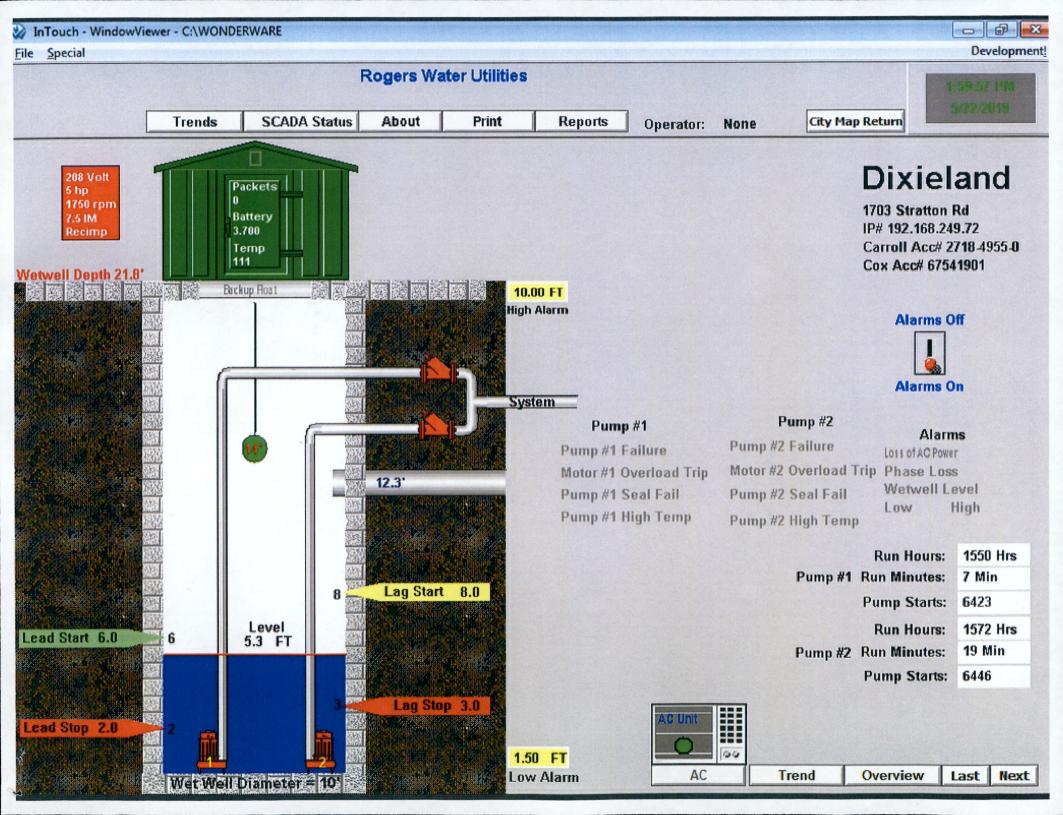
Brent Dobler

Superintendent, Rogers Water Utilities

ENC.

- 1. Screen shot of Camden Way SCADA screen.
- 2. Screen shot of Dixieland Crossing SCADA screen.







May 20, 2019

Mr. Garrett Grimes
ADEQ
Office of Water Quality Compliance Branch
5301 Northshore Dr
North Little Rock, AR 72118-5317

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

Dear Mr. Grimes:

Please accept this letter as the required response to your findings detailed in your May 9, 2019 letter. These findings were 1. Discharges with a Total Residual Chlorine (TRC) over .1 mg/L occurred in March and April 2018. These are violations of Part I, Section A of the permit. 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.

In response to item 1: Please see the previous notices sent to ADEQ in regards to our reporting and investigations and corrections.

In response to item 2: We do not have a Part III, Section B.1.a in our permit. After clarification via phone, the intent was Part II same section. A response to that follows.

The referenced pump was recently installed due to the previous pump wearing out. The pump is not performing to specification. The pump's failure is exacerbating the scum problem, not the condition asserted in the findings of the scum causing pump problems. We are working with the vendor of the pump to resolve the issue with the pump. We are also working to resolve our nocardia scum issue. Some of the scum problem is the design of the plant and has always been present in the older two trains. We will never be able to completely remove scum from those. The nocardia outbreak which we are close to resolving did make the design problem worse during your visit. In any event, the nocardia outbreak/excessive scum has not caused us to fail to achieve permit compliance or conditions as evidenced by our recent DMRs. In this light, RWU does not see this as a permit violation in the intended section. Until we violate our permit conditions due to scum, the referenced section does not apply.

Sincerely,

Brent Dobler

Superintendent, Rogers Water Utilities

ENC.

- 1. Email 4/13/18
- 2. Email 5/1/18

Todd Beaver

From:

Todd Beaver

Sent:

Friday, April 13, 2018 8:38 AM

To:

Anderson, Alan

Cc:

Cary Roth; David Staib; Sean Dagestad

Subject:

AR0043397 - Violation

Alan,

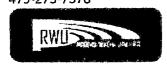
Thursday 4/12/18 we exceeded our permit limit of 0.10 mg/L Total Residual Chlorine. The sample collected at 1104 had 0.92 mg/L TRC. I collected again at 1125 and the concentration had dropped to 0.06 mg/L TRC.

My investigation indicates personnel were cleaning one of our tertiary filter backwash channels with bleach at the time of the sample. All of the personnel say they didn't put the bleach in the effluent water side of the filter. This morning there is what algae on the effluent side of the filter. It was a windy day and it's possible enough of the powder was blown over to cause the spike. We will put this in our notes section on our filter work order to wait for a day when the wind isn't blowing to prevent future issues.

Please accept this email as our required notification. If you have further questions or comments, please call or email.

Sincerely,

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



Todd Beaver

From:

Todd Beaver

Sent:

Thursday, March 1, 2018 3:56 PM

To:

'ANDERSON@adeq.state.ar.us'

Cc:

Cary Roth; David Staib; Earl Rausch

Subject:

AR0043397

Mr. Anderson,

Thursday 3/1/18 at 10:19 AM, our effluent grab sample indicated a chlorine residual of .14 mg/L. Our discharge limit is an instantaneous .1 mg/l. We investigated and found a faulty sulfur dioxide regulator and immediately replaced the faulty equipment. We re-tested at 11:24 A.M. and found we were back to a .01 residual and back to compliance. We will report the exceedence in our DMR as the single failure value for 3/1/18.

Please accept this notice as our immediate reporting requirement. If you have further questions or comments please call or email.

Sincerely,

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





May 20, 2019

Mr. Garrett Grimes
ADEQ
Office of Water Quality Compliance Branch
5301 Northshore Dr
North Little Rock, AR 72118-5317

RE: Rogers Pollution Control Fac. Inspection AFIN 04-00155 Permit No: ARR00C388

Dear Mr. Grimes:

Please accept this letter as the required response to your findings detailed in your May 9, 2019 letter. These findings were 1. Rogers Pollution Control Facility's solids handling buildings are currently undergoing renovations and improvements. At the time of the inspection, bags of removed solids were stored in an uncovered loading zone. This is a violation of Part 1.7 of the permit.

In response to item 1: We completed the temporary covering of the material storage.

Sincerely

Brent Dobler

Superintendent, Rogers Water Utilities

ENC.

1. Photo of covered temp storage



Rogens Warren Utilities P.O. Box 338 Rogens, AR 72756

720 721 721145 N3-98

4059190524-102702010

PRSRT FIRST-CLASS MAIL
U.S. POSTAGE PAID
Fayetteville, AR
PERMIT# 986

059190524-102723619

RETURN SERVICE REQUESTED

72118 աստավիստիուկիարդկենըկիկորկոկին

Ankansas Verantment of Environmentor Quity. 5301 NonthSHORE Drive Nonth Little Nock, AR 72118-5317

ATTN: GARRETT GRÎMES



August 29, 2019

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

RE: Adequate Response to Collection System Inspection

AFIN: 04-00155 Permit No.: AR0043397

Dear Mr. Dobler:

The Department has received your May 20, 2019, response to the Collection System Inspection conducted on April 3, 2019. Your response adequately addresses the request 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