ARKANSAS
ENERGY & ENVIRONMENT

February 8, 2022

Brent R. Dobler, Utility Superintendent
City of Rogers
4300 Rainbow Road
Rogers, AR 72758
Sent via email to: brentdobler@rwu.org

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

Dear Mr. Dobler:

On September 14 and 15, 2021, I 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 inspection report for any comments.

If I can be of any assistance please contact me at grimes@adeq.state.ar.us or 501-837-2067.

Sincerely,

Garrett Grimes
Inspector, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

ENVIRONMENTAL QUALITY

OFFICE OF WATER QUALITY INSPECTION REPORT

AFIN: **04-00155**	PERMIT #: **AR0043397**	DATE: **9/14/2021**
COUNTY: **04 Benton**	PDS #: **118904**	MEDIA: **WN**
GPS LAT: **36.29794** LONG: **-94.21233** LOCATION: **General Area**		

FACILITY INFORMATION

NAME:
Rogers Pollution Control Fac.
LOCATION:
4300 Rainbow Road
CITY:
Rogers

RESPONSIBLE OFFICIAL

NAME: / TITLE
Brent R. Dobler / Utility Superintendent
COMPANY:
City of Rogers
MAILING ADDRESS:
4300 Rainbow Road
CITY, STATE, ZIP:
Rogers AR 72758
PHONE & EXT: / FAX:
479-273-7627 /
EMAIL:
brentdobler@rwu.org
CONTACTED DURING INSPECTION: **Yes**

INSPECTION INFORMATION

FACILITY TYPE:	INSPECTOR ID#:
1 - Municipal	**104111 S - State**

FACILITY EVALUATION RATING:	INSPECTION TYPE:
N	**Pretreatment Compliance**

DATE(S):	ENTRY TIME:	EXIT TIME:
9/14/2021	**09:00**	**16:30**
9/15/2021	**09:00**	**12:00**

PERMIT EFFECTIVE DATE: **1/31/2006**
PERMIT EXPIRATION DATE: **2/28/2023**

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

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Paul Burns, Pretreatment Coordinator, RWU;
Amber Owens, Pretreatment, RWU;
Brent Walker, Inspector Supervisor, DEQ;
Cole Southerland, inspector, DEQ;
Garrett Grimes, inspector, DEQ

AREA EVALUATIONS

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

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

SUMMARY OF FINDINGS

No violations were noted during the inspection. Rogers Water Utilities (RWU) Pretreatment Personnel were very knowledgeable and were able to answer questions related to their program in detail. RWU pretreatment personnel also appear to maintain a good working relationship with their IUs and have a well-organized program.

GENERAL COMMENTS

See attached PCI report for any comments.

INSPECTOR'S SIGNATURE: Garrett Grimes **Garrett Grimes**	DATE: **10/18/2021**
SUPERVISOR'S SIGNATURE: Brent L Walker **Brent L. Walker**	DATE: **1/31/2022**

DIVISION OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: **City of Rogers**
AFIN Number: **04-00155**
NPDES Permit Number(s): **AR0043397**
Program Tracked under NPDES Permit Number: **AR0043397**
Fact Sheet Preparation Date:
Date of Last PCI/Audit: **9/7/2017 (PCI) 12/16/2014 (Audit)**
Date of Last Annual Report: **1/26/2021**
Name of Inspector: **Garrett Grimes**
Date PCI Performed: **9/14/2021 – 9/15/2021**
Name and Title of Facility Representative: **Paul Burns, Pretreatment Coordinator, Rogers Water Utilities (RWU)**
Name and Title of Other Participants: **Amber Owens, Pretreatment; Brent Walker, Insp. Supervisor; Cole Southerland, Insp.**
Number of IUs Visited: **2**
Name(s) of IUs Visited: **Glad Manufacturing, Preformed Line Products**
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED
NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

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. **No change**

2. Has ADEQ or EPA been notified of these changes? **NA**

3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes

4. What procedures are being used to update the IU Survey? **Send questionnaire to industries that are connecting that may introduce issues (i.e. breweries). Discuss with City and Water Dept., Fire Dept. about commercial connections.**

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? **NAICS codes in survey**

8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphating, zinc plating, etc.). Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Bekaert Steel	**433.17 & 420.96**	**Metal Finishing**
Preformed Line Products	**467.55**	**Aluminum Forming**
Kennametal	**471.54**	**Metal Forming**

B. LOCAL LIMITS

1.IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, for CBOD, TSS, and Phosphorous (ammonia report only). Adopted new surcharge rates for total P. and ammonia.

2. Describe any apparent problems with the local limits. **No, previous note of CBOD at Southeast Poultry addressed, upgraded their aeration equipment.**

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Sampling Frequency	Permit Requirement	Program Requirement
Metals:			
Influent:	**Quarterly**	**1/Quarter**	**1/Quarter**
Effluent:	**Quarterly**	**1/Quarter**	**1/Quarter**
Sludge:	**6/Year**	**1/Quarter**	
Organics:			
Influent:	**1/year**	**1/Year**	
Effluent:	**1/year**	**1/Year**	
Sludge:			

Comments:

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? **Ink from West Rock in plant in 2021, but did not cause upset.**

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? **10**
3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT. Yes
4. Does the control document contain the following items? List the section of the permit each item is listed under.
An expiration date: **Yes**
Discharge limitations: **Yes**
If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.
IU self-monitoring requirements: **Yes – Part I**
IU reporting requirements: **Yes – Part I**
5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.
Sample location: **Yes – Part I**
Type of sample: **Yes – Part I**
Monitoring frequency: **Yes – Part I**
Bypass prohibition: **Yes – Part II, Section B.3**
Right of entry: **Yes – Part II, Section B.9**
Non-transferability: **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.3**
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 Requirements:
Sampling:		
Categorical IUs	**At least 1/Year**	**1/year**
Other SIUs	**At least 1/Year**	**1/year**
Non-SIUs		
Inspection:		
Categorical IUs	**1/Year**	**1/year**
Other SIUs	**1/Year**	**1/year**
Non-SIUs		

Comments:

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

3. Are inspections announced or unannounced? **Announced (typically)**

4. Are records kept of each inspection? **Yes**

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. Please describe the 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? **Yes**
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 logs and spreadsheets.**
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
17. What are the POTW's procedures for following up violations? **Informal enforcement/meetings, written NOV's, AO, SCO, fines Etc.**
18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? NA
Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR. **NA**
Name and address: **NA**
Other environmental permits held: **NA**
Description of operations: **NA**
Process flow diagrams: **NA**
Flow measurements: **NA**
Measurements of regulated pollutants: **NA**
Certification of compliance by the IU: **NA**
Compliance schedule (if needed): **NA**
19. Additional comments on the POTW's inspection and sampling procedures: **Inspections conducted by RWU are very thorough**

E. Enforcement

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

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

Effluent limitations: **NOV or SNC depending on the frequency of the excursion. SNC or repeat NOV can require AO and/or formal enforcement. Chronic violations (66% of measurements past limits in 6 months) & TRC violations (33% of measurements for the same parameter over limits in 6 months) require SNC.**

Late reports: **SNC after 45 days.**

Unpermitted discharges: **SNC**

Slug loads or spills: **SNC**

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)?

- **None published since last inspection**

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:
Pel Freez	**Missed sample**	**NOV (not sig.)**	
Southeast Poultry	**O&G above limits**	**NOV (not sig.)**	

5. Comments on the POTW's enforcement procedures:

None

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: **None**
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **NA**
3. Does the POTW have copies of permits for IUs in other cities? **NA**
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? **NA**
5. Comments on multijurisdictional issues: **NA**
H. EVALUATION AND COMMENTS
Overall satisfactory Pretreatment Program. Staff were very knowledgeable and professional.

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: Glad manufacturing
POTW Name: Rogers Pollution Control Facility
Industry Contacts: Brian Hering, Plant Manager; June Green, Environmental Coordinator; Paul Simkins, Facility Support; Lori Wilson
Date and Time of Visit: September 14, 2021, 12:30
Description of Manufacturing Process: Plastic pellets are molded into product such as plastic containers. Off-spec products are recycled back into raw material that can be reused.
Sources of Process Wastewater: Outfall 001 consists of a combination of sanitary sewage and process water used for cooling machinery.
Categorical Industry? No
Basis for Limits: 40 CFR Part 403
Point of Application: Point of discharge
Description of Pretreatment Equipment and Procedures: Water used in machinery during the manufacturing process is passed through a triple screen system to remove plastic pellets that may have been picked up during this process. Other controls involve wastewater general monitoring and reporting by the facility.
Spill Prevention and Solvent Management Procedures: Chemicals are stored in special building designed for spill control.
Sampling Location and Equipment: Outfall 001, 3″ Parshall flume with auto sampler and DO and pH meter.

PRETREATMENT COMPLIANCE INSPECTION
IU SITE VISIT FORM

Name of Industry: Preformed Line Products
POTW Name: Rogers Pollution Control Facility
Industry Contacts: Lloyd Brown, Lead Assessor and Compliance Technician
Date and Time of Visit: September 14, 2021, 14:36
Description of Manufacturing Process: Oil coated aluminum wire is drawn to reduce diameter, formed into shape, and washed with an alkaline rinse. In a separate process galvanized wire is formed and cleaned with an alkaline rinse. Wire is then further processed by deburring via tumbling, stamping, and twisting into cable. Neoprene is used for welding and assembly. Plastics are used for molding casing and parts.
Sources of Process Wastewater: Rinse water is collected into tanks and discharged to the POTW. The 4000 gallon rinse tank is discharged once-per-month and the two cleaning tanks are discharged once every six weeks.
Categorical Industry? Yes
Basis for Limits: 40 CFR Parts 403 and 467.55
Point of Application: Point of discharge
Description of Pretreatment Equipment and Procedures: The pretreatment system processes 700 gallons of wastewater at intervals of twice-per-day. No pretreatment is associated with the discharge of the 4000 gallon rinse tank and is direct discharged with 300 gallons of rinse water. Wastewater is collected into two 5000 gallons tanks and transferred to a 1000 gallon mix tank at 700 gallon batches. Coagulant and pH adjustment are added to this mixing tank prior to transfer to the DAF system. After the DAF system, effluent is pumped to a 1000 gallon tank where an organo-clay polisher can be added prior to discharge.

Spill Prevention and Solvent Management Procedures: Chemical storage is located in a separate building and main factory interior. Chemicals in this building include any hazardous wastes or waste chemicals. The separate building redirects all spills to an underground holding tank. Other chemicals are stored in the plant. Petroleum naptha is stored in an underground storage tank.
Sampling Location and Equipment: A modified 1” parshall flume is in place prior to discharge from the plants outfall. At the time of the inspection the casing for this flume had been damaged by impact from a vehicle. A new outfall and discharge location was under construction.

PPETS CODE SHEET
PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	**Paul Burns**	
NAME OF FACILITY:	**Rogers Water Utility**	
PERMIT NUMBER USED TO TRACK PROGRAM:	**AR0043397**	NPID
DATE OF PCI:	**September 14 – 15, 2021**	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:	**0**	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	**0**	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	**0**	SNIN