

January 8, 2018

Mr. Alan Anderson  
Water Enforcement Analyst  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317  
Submitted via email: [ANDERSON@adeq.state.ar.us](mailto:ANDERSON@adeq.state.ar.us)

RE: AFIN: 04-00155 Permit No.: AR0043397

Dear Mr. Anderson:

Please accept this correspondence as a follow up from previous letters of investigation on our dissolved oxygen system as well as the violations for March, and May for chlorine residual and a high fecal on outfall 002 April that was a failure for that outfall only.

To follow up on our post aeration dissolved oxygen system, our simplified control system went online in October. It has worked satisfactorily since going online. We do intend to improve efficiency in the delivery of the dissolved oxygen in the near future with a system to increase the time under pressure in the delivery pipe. This change will not affect the treatment system or permit.

The March chlorine failure was an issue with SCADA system logic not working with the alternate feed point at extremely high flows. We switched feed points and reviewed our control logic. We did submit the attached notice on March 30<sup>th</sup> on the incident to Mr. Leamons.

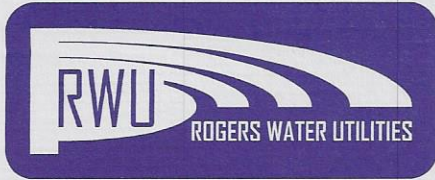
The April fecal violation on outfall 002 was related to the March incident above. Please note in the previously submitted letter due to the high flows, overfeeding, and a late truck we ran out of chlorine for a brief period. This resulted in an extremely high fecal count on both outfalls. The reason it was only a violation on 002 was that due to the rain, flow to outfall 2 was nonexistent after this event to lower our average with the follow up low numbers after the problem was corrected. Outfall 002 for that month was only represented by the single problem event that actually occurred in late March.

The May chlorine failure was due to problems with our chlorine analyzer outlined by my letter submitted on June 5, 2017 (attached here also) requesting moving away from online testing and going to a grab sample by our lab. I do not believe we had actual high chlorine residual in this instance, but we couldn't get a sample to confirm and the meter showed a consistent number for a long enough period, we were required to report it. After visiting with Hach on the range of values the manufacturer considers "accurate;" we will continue to utilize the approved grab sample until we can find a better meter or our permit requirements change.

Yours truly,

A handwritten signature in black ink, appearing to read "Todd Beaver", is written over a horizontal line.

Todd Beaver, P.E.  
Plant Manager



## ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

March 29, 2017

Bryan Leamons Water Division  
NPDES Permits Branch  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317  
Via Email leamons@adeq.state.ar.us

Permit Number: AR0043397; Chlorine overfeed notification

To whom it may concern:

On March 28, 2017 at 2:10 PM our grab sample for Chlorine residual indicated .46 mg/L. We immediately took another sample and a duplicate at 2:30 PM which indicated .50 and .52 respectively.

We assessed our automated feed system was struggling with the abnormal flows from I and I and moved the feed point from our contact chamber to our filters to allow more contact time. Our online meter showed immediate results. We took another grab sample at 4:09 PM to confirm we were at .1 mg/L. The heavy flows also caused us to use more CL2 than anticipated and our delivery truck ran late. This resulted in a period between 8:30 and 12:30 where there was no feed. As soon as the Truck arrived we connected the new tank and feed resumed.

I attempted to call Jason Bolenbough, Bryan Leamons, and Garrett Grimes to report the incident verbally and left a voice mail for all three. I am following up with this memo.

Yours truly,

A handwritten signature in black ink that reads 'Todd Beaver'. The signature is written in a cursive style with a large 'T' and 'B'.

Todd Beaver  
Plant Manager

## Todd Beaver

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**From:** Todd Beaver  
**Sent:** Monday, June 05, 2017 2:03 PM  
**To:** Anderson, Alan  
**Cc:** David Staib; Cary Roth; Earl Rausch  
**Subject:** AR0043397 Rogers, AR Rogers Water Utility

Alan,

We are using an on line Hach CL17 chlorine analyzer which is an EPA approved method of "continuous" monitoring for CL2. We have been on the phone with Hach and troubleshooting in house some of the erroneous readings we have been getting. Our issue is the meter reads from 0 to 5 +/- .04 mg/L. Our limit is an instant max of .1. The acceptable error from the manufacturer is 80% of our max. We are getting readings that we know are false according our lab testing and other equipment. IE, we are occasionally showing less in our contact basin than our discharge after we have treated SO2.

What I would like to do is go back to our 3 grab samples a week for reporting. Our permit we are operating on has a 3/week in the frequency, but then it says continuous in the sample type which seems to be at odds with each other. Is there a problem with going to the 3 grab samples a week? If we need to remain "continuous", I would like to get an approved meter with a narrower band we can be more confident in reading under .1 mg/L. Do you have a suggested meter or a list of approved meters I can check the specifications on?

Sincerely,

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



# ADEQ

ARKANSAS  
Department of Environmental Quality

**JUN 19 2017**

Todd Beaver, P.E.  
City of Rogers  
4300 Rainbow Rd.  
Rogers, AR 72758

Re: NPDES Permit Number AR0043397, AFIN 04-00155

Dear Mr. Beaver:

The Department is in receipt of your request dated June 5, 2017 regarding Total Residual Chlorine (TRC) monitoring. The current permit (effective March 1, 2006) for this facility requires a monitoring frequency of three/week with a sample type of continuous. Condition 7 of Part III of the permit does allow for alternative monitoring methods and/or analytical instruments. The Department has no objection to the facility taking grab samples for TRC until the next issuance of NPDES individual discharge permit AR0043397. Sample type and sampling frequency will be evaluated at the time of the next permit application to determine appropriate requirements for this facility.

Thank you for your cooperation in this matter. If there are any questions concerning this submittal, please contact Jessica Temple in the Permits Branch at (501) 682-0621.

Sincerely,



Bryan Leamons, P.E.  
Senior Operations Manager  
Office of Water Quality

cc: Richard Healey, Branch Manager, Enforcement Branch, Office of Water Quality  
Jason Bolenbaugh, Branch Manager, Compliance Branch, Office of Water Quality  
Alan Anderson, Enforcement Analyst, Enforcement Branch, Office of Water Quality  
Miles Johnson, Enforcement Coordinator, Enforcement Branch, Office of Water Quality  
Todd Beaver, P.E., toddbeaver@rwu.org