



Office of Water Quality Compliance
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118

April 7, 2021

Re: Rogers Water Utilities, Permit No.: AR0043397

Dear Sir or Madam:

Please accept this response for a Corrective Action Plan (CAP) outlining the cause(s), evaluation(s) and actions taken to correct, and prevent recurrences noted by Mr. Grimes in his January 13, 2021 inspection and documented in his March 30, 2021 letter. He has generously given us 15 days to formulate a response by April 15, 2021. The staff at Rogers takes great pride in taking care of the watershed and keep all areas that drain into our stormwater structures clear of pollutants.

As noted by Mr. Grimes, RWU had material that spilled from trucks during the loading process and some that remain in the loading chute after the truck has departed and wind or other vibrations cause it to fall out later. RWU does clean this area periodically according to staffing and need. However, we clean it because of the pride we take in our facility. The staff at RWU understands that gravity rather than proximity dictate where stormwater goes. Mr. Grimes was concerned about proximity for some reason I do not understand since he had the gravity data available and 3 months to look at the site plan he attached. As shown in the site plan Mr. Grimes provided the solids flow into the old solids pad and back to the plant headworks. RWU also takes exception to the generic labeling of this material as "biosolids." This material is Class A EQ biosolids and no longer a regulated pollutant according to 40 CFR part 403 so this is a critical point. All storm drains on the RWU property have adequate grass barrier to account for minor spills like this prior to entering the waterway and becoming a problem if they were to enter our storm drains. Had Mr. Grimes even informed RWU staff he was doing a stormwater inspection and had questions on the disposition of the material, we could have happily educated him during his visit and saved us all some time.

Actions taken: Typical cleaning of loading area.

RWU request acknowledgement that ADEQ agrees with 40 CFR part 503 and class A EQ biosolids are no longer a pollutant and are distinguishable from biosolids which are a pollutant and a grass buffer prior to entering a waterway is sufficient to protect the waterway from minor quantities. Further, RWU would like acknowledgement that gravity rather than proximity is the controlling factor of stormwater flow and therefore material in our loading area are not dangers to our watershed.

Sincerely,

A handwritten signature in black ink that reads "A. Todd Beaver". The signature is written in a cursive, flowing style.

A. Todd Beaver, P.E.
Enclosure 1- photo of loading area

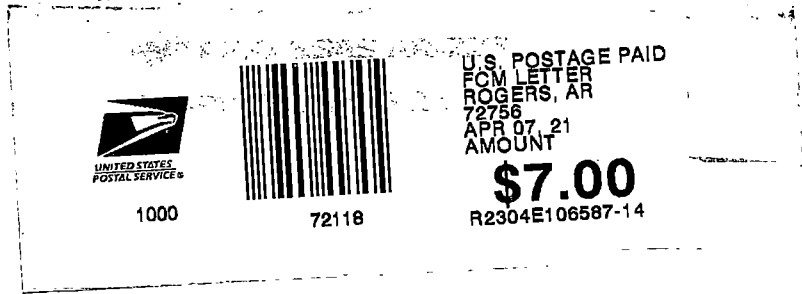
Copy: B. Dobler, T. Beaver, D. Staib

Rogers Water Utilities | Pollution Control Facility | 4300 Rainbow Road | Rogers, Arkansas
72758

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ROGERS POLLUTION CONTROL FACILITY
4300 RAINBOW ROAD
ROGERS, ARKANSAS 72758-1440



7020 1810 0000 3009 7154



CERTIFIED MAIL

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

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5301 North Shore Dr
North Little Rock, AR 72118

72118-5301799

