



January 15, 2020

Brent R. Dobler, Utility Sup.  
Rogers Water Utilities  
601 S. 2<sup>nd</sup> St.  
Rogers, AR 72756

RE 12/13/2019 ADEQ letter from Gavin Gray

Dear Mr. Dobler:

After consulting with you regarding the violations noted in the attached letter, a recommended CAP follows for permit violations.

The 10/30/2019 Total residual chlorine violation of .85 mg/L with an instantaneous max of .1 mg/L. The exceedence occurred due to a controller failure in the full feed mode for both chlorine (CL2) and sulfur dioxide (SO2). When we corrected the issue it immediately started the correct feed for both CL2 and SO2. Due to the detention time between the feed points the relative lower concentration of SO2 was not enough to dechlorinate the CL2 still in the contact zone and our sample happened to occur during that time. A resample 20 minutes later was within permit. In an effort to prevent this failure in the future, staff will be trained to be more cautious during repairs to be sure over chlorinated water is resolved before returning to normal operations.

The 4/30/2019 and 5/31/2019 CBOD violations are due to the same error. The 5/31 violation just included the 4/30/2019 data. The error was due to a new lab technician not understanding how to dilute for a CBOD test. Our CBOD was elevated above normal operations for the sample but not a true violation. Having never seen one elevated, they diluted for our typical concentration. The value was not measurable due to the way the test is ran, so we had to report a > the max amount we diluted for. This has been addressed by re-training our new lab technician.

Sincerely,

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

Todd Beaver, P.E.

Encl: 12/13/2019 ADEQ letter

# ADEQ

ARKANSAS  
Department of Environmental Quality

December 13, 2019

Brent R. Dobler, Utility Sup.  
City of Rogers  
4300 Rainbow Road  
Rogers, AR 72758

RE: NPDES Permit Number AR0043397, AFIN 04-00155  
Permitted Effluent Limitation Violations

Dear Mr. Dobler,

A review of recent Discharge Monitoring Reports (DMRs) for the above-mentioned facility revealed the following compliance issues:

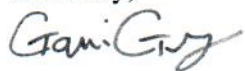
The facility has reported 4 violations of Part I, Section A of NPDES Permit No. AR0043397 during the review period. A detailed list of the violations has been included with this letter. The Department expects the City of Rogers to work toward preventing violations of the Part I, Section A., Effluent Limitations and Monitoring Requirements of the Permit.

The Department recommends that the City of Rogers consult with a professional engineer for the purpose of developing a corrective action plan (CAP) designed to eliminate violations of the effluent limitations of the Permit.

Any violation of your NPDES Permit is subject to enforcement action by this Department, pursuant to the Arkansas Water and Air Pollution Control Act. The regulations and your NPDES Permit require that you take all reasonable measures necessary to eliminate or prevent the occurrence of violations.

Should you have any questions concerning the above referenced compliance issues, please feel free to contact me at 501-682-0667, or you may e-mail me at [gavin.gray@adeq.state.ar.us](mailto:gavin.gray@adeq.state.ar.us).

Sincerely,



Gavin Gray  
Enforcement Analyst  
Office of Water Quality, Enforcement Branch

Monitoring Period End Date	Dsch#	Parameter	Limit Value	DMR Value	% Vio	Violation Code
10/31/2019	001-B	Chlorine, total residual, INST MAX, mg/L	0.1	<u>0.85</u>	750%	E90
05/31/2019	001-B	BOD, carbonaceous [5 day, 20 C], 7 DA AVG, mg/L	15	>3.6	99,999%	E90
04/30/2019	001-B	BOD, carbonaceous [5 day, 20 C], MO AVG, lb/d	1751	>157	99,999%	E90
04/30/2019	001-B	BOD, carbonaceous [5 day, 20 C], MO AVG, mg/L	15	>2.2	99,999%	E90