ANNUAL PRETREATMENT PROGRAM STATUS REPORT

for the

CITY OF ROGERS, ARKANSAS

January 2011 – December 2011

Permit No. AR0043397

Submitted to
Arkansas Department of Environmental Quality (ADEQ)

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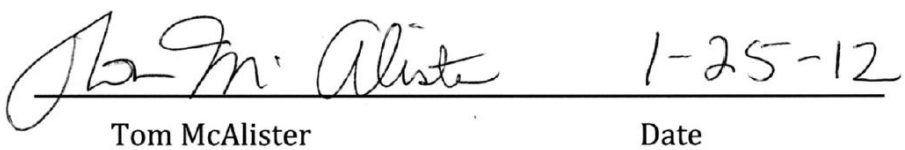
I. Certification

NPDES Permit Holder:	City of Rogers
Report Date:	January 27, 2012
Reporting Period:	January 2011 – December 2011
POTW:	Rogers Pollution Control Facility
Address:	4300 Rainbow Road
	Rogers, AR 72758-1440
NPDES Permit Number:	AR0043397 – AFIN 04-00155
Effective Date:	March 1, 2006
Modified Date:	November 1, 2006
Expiration Date:	February 28, 2011

For further information concerning this report contact:

Paul Burns
Pretreatment Coordinator
4300 Rainbow Road
Rogers, AR 72758-1440
479-273-7378 x109
paulburns@rwu.org

I certify under penalty of law that all the information supplied in this report, including attachments, is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for purposely, knowingly, recklessly or negligently submitting false information.



1-25-12

Tom McAlister
General Manager
Rogers Water Utilities

Date

II. A. MONITORING RESULTS TABLE III POLLUTANTS
REPORTING YEAR: JANUARY 2011 TO DECEMBER 2011

TREATMENT PLANT: City of Rogers **NPDES PERMIT NO. AR0043397**

AVERAGE POTW FLOW: L001 = 6.772 MGD, L002 = 0.895 MGD **% STORM WATER INFILTRATION: 5.9** **% IU FLOW: 16.5**

METALS, CYANIDE & PHENOLS (Total)	Units	Maximum Allowable Headworks Level µg/L	Influent Concentrations in µg/L Dates Sampled 03/01-02	06/06-07	08/17-18	12/07-08	Calc. WLAc Level/ Limit µg/L	Effluent Concentrations in µg/L Dates Sampled 03/02-03	06/07-08	08/18-19	12/08-09
Antimony	µg/L	na	0.35	< 0.15	< 0.15	1.60	na	0.45	< 0.06	0.72	0.4
Arsenic	µg/L	25.0	0.45	< 0.10	0.72	0.60	504	0.35	< 0.14	0.52	0.25
Beryllium	µg/L	na	< 0.15	< 0.15	0.15	< 0.30	na	< 0.15	< 0.06	0.12	< 0.15
Cadmium	µg/L	19.0	< 0.10	< 0.10	0.30	< 0.20	10.30	0.10	< 0.04	0.1	< 0.10
Chromium	µg/L	528	1.70	1.20	1.40	2.00	1847	0.40	0.26	0.50	0.30
Copper	µg/L	678	30.7	26.5	14.4	46.9	60.5	1.75	1.38	0.98	3.35
Lead	µg/L	71.0	1.15	1.05	0.98	3.40	27.6	0.25	0.02	0.20	0.15
Mercury	µg/L	0.8038	0.0867	0.0753	0.2180	0.0777	0.0167	0.0007	0.0025	0.0022	0.0028
Molybdenum	µg/L	53.0	1.90	< 0.25	0.70	1.00	na	1.15	0.24	0.94	0.70
Nickel	µg/L	19.0	4.15	4.75	2.65	8.50	621	1.70	< 2.00	1.74	1.8
Selenium	µg/L	16.0	< 1.0	< 1.0	< 1.0	< 2.0	8.28	< 1.0	< 0.40	< 0.40	< 1.0
Silver	µg/L	100	0.45	< 0.40	< 0.40	< 0.80	25.0	< 0.4	< 0.16	< 0.16	< 0.40
Thallium	µg/L	na	< 0.25	< 0.25	< 0.25	< 0.50	na	< 0.25	< 0.10	0.12	< 0.25
Zinc	µg/L	500	99.8	84.6	70.0	197.0	460	48.7	39.5	41.0	55
Cyanide	µg/L	27.0	< 10	< 10	< 10	< 10	8.5	< 10	< 10	< 10	< 10
Phenols	µg/L	na	22	44	20	35	na	20	10	7	< 6
			Loading in lb/day					Loading in lb/day			
Antimony	lb/day	na	0.0198	< 0.0085	< 0.0083	0.1021	na	0.0258	< 0.0031	0.0324	0.0265
Arsenic	lb/day	1.413	0.0254	< 0.0057	0.0396	0.0383	28.48	0.0200	< 0.0073	0.0234	0.0165
Beryllium	lb/day	na	< 0.0085	< 0.0085	0.0083	< 0.0192	na	< 0.0086	< 0.0031	0.0054	< 0.0099
Cadmium	lb/day	1.074	< 0.0057	< 0.0057	0.0165	< 0.0128	0.582	0.0057	< 0.0021	0.0045	< 0.0066
Chromium	lb/day	29.841	0.0961	0.0678	0.0771	0.1277	104.387	0.0229	0.0136	0.0225	0.0198
Copper	lb/day	38.319	1.7351	1.4977	0.7927	2.9938	3.419	0.1002	0.0722	0.0441	0.2215
Lead	lb/day	4.013	0.0650	0.0593	0.0539	0.2170	1.560	0.0143	0.0010	0.0090	0.0099
Mercury	lb/day	0.045	0.00490	0.00426	0.01200	0.0050	0.00094	0.00004	0.00013	0.00010	0.00019
Molybdenum	lb/day	2.995	0.1074	< 0.0141	0.0385	0.0638	na	0.0658	0.0126	0.0423	0.0463
Nickel	lb/day	1.074	0.2345	0.2685	0.1459	0.5426	35.097	0.0973	< 0.1046	0.0783	0.1190
Selenium	lb/day	0.904	< 0.0565	< 0.0565	< 0.0550	< 0.1277	0.468	< 0.0572	< 0.0209	< 0.0180	< 0.0661
Silver	lb/day	5.652	0.0254	< 0.0226	< 0.0220	< 0.0511	1.413	< 0.0229	< 0.0084	< 0.0072	< 0.0265
Thallium	lb/day	na	< 0.0141	< 0.0141	< 0.0138	< 0.0319	na	< 0.0143	< 0.0052	0.0054	< 0.0165
Zinc	lb/day	28.259	5.6404	4.7813	3.8532	12.5753	25.998	2.7872	2.0665	1.8456	3.6371
Cyanide	lb/day	1.526	< 0.5652	< 0.5652	< 0.5505	< 0.6383	0.480	< 0.5723	< 0.5232	< 0.4501	< 0.6613
Phenols	lb/day	na	1.2434	2.4867	1.1009	2.2342	na	1.1447	0.5232	0.3151	0.3968
Flow	MGD	INF	7.017	7.592	6.596	7.649	EFF	6.858	6.269	5.394	7.924

Laboratory Analysis 2011		
EPA Method	Detection Limit µg/L	EPA MQL µg/L
200.8	0.15	60
200.8	0.10	0.5
200.8	0.15	0.5
200.8	0.10	0.5
200.8	0.25	10.0
200.8	0.15	0.5
200.8	0.05	0.5
1631	0.0002	0.005
200.8	0.25	na
200.8	0.50	0.5
200.8	1.0	5
200.8	0.40	0.5
200.8	0.25	0.5
200.8	2.5	20
4500-CN f	10	10
420.1	6	5

MDL's based on effluent samples which are usually diluted 5X prior to analysis; occasionally, the contract lab will only dilute the effluent sample 2X; MDL's for Influent are higher because the samples are usually diluted 10x.

Samples are collected considering flow detention time through the plant. Analytical MQLs are used. MAHL and WQL calculated during development of 2004 TBLL and are based on State Water Quality Standards and implementation procedures. The flow readings (MGD) are reported as average daily flow for the date of the analysis and not the average daily flow for the month. CN and Phenol sampled as grabs, 4 grabs over 24 hours combined to be analyzed as one sample. All other pollutants collected as 24 hr composite samples including Hg. Loadings limits for MAHL and WQL calculated using the average yearly L001 flow of 6.772 MGD.

II. C. RPCF 2011 Priority Pollutant Scan - 40 CFR 122 Appendix D Table II

Name	CAS No.	Molecular Formula	Type	Influent mg/L	Effluent mg/L	Req MQL
Chloroform	67663	$CHCl_3$	VOC	0.0106	< 0.010	0.010

< Equivalent of not detected
BNA and Pest/PCB all not detected
Influent Grab Samples for VOC, BNA and Pest/PCB collected 06/06/2011
Effluent Grab Samples for VOC, BNA and Pest/PCB collected 06/07/2011
Effluent and Influent VOC, BNA, and Pest/PCB dilution factor = 1

Based on the information available to the Control Authority, there was no reason to suspect the presence of any toxic or hazardous pollutants listed in Table V, or any other pollutants known or suspected to adversely affect treatment plant operations, receiving water quality, or solids disposal procedures. For this reason no analysis was conducted.

III. Attachment A

2011 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

			CONTROL DOC					COMPLIANCE STATUS REPORTS				
INDUSTRIAL USER	**SIC CODE**	**CATEGORICAL DETERMINATION**	**Y/N**	**LAST ACTION**	**NEW USER**	**TIMES INSPECTED**	**TIMES SAMPLED**	**BMR**	**90- DAY COMPLIANCE**	**SEMI ANNUAL**	**SELF MONITORING**	**PERMIT EFFLUENT**
Bekaert Steel	2296	Metal Finishing 433.17 & Iron and Steel 420.96	Y	01/01/10	N	1	14	N/A	N/A	C	C	NC
Glad Manufacturing	2673	Non-categorical	Y	01/01/10	N	1	13	N/A	N/A	C	C	C
Kennametal	3545	Non-Ferrous Metals 471.54	Y	07/01/10	N	1	17	N/A	N/A	C	C	NC
MAFCO	3443	Metal Finishing 433.17	Y	01/01/10	N	1	04	N/A	N/A	C	C	C
Model Laundry	7211	Non-categorical	Y	01/01/10	N	1	11	N/A	N/A	C	C	NC
Ozark Mt. Poultry	2015	Non –cat Meat&Poultry 432.126*	Y	01/01/10	N	1	13	N/A	N/A	C	C	C
Pel-Freez Arkansas	2015	Non-cat Meat&Poultry 432.54*	Y	01/01/10	N	1	06	N/A	N/A	C	C	C
Preformed Line	3644	Aluminum Forming 467.55	Y	02/01/10	N	1	12	N/A	N/A	C	C	NC
Southeast Poultry	2015	Non-cat Meat&Poultry 432.126*	Y	10/01/10	Y	1	43	N/A	N/A	C	C	NC
Superior Ind.	3363	Metal Finishing 433.17	Y	01/01/10	N	1	14	N/A	N/A	C	C	C
Tyson Chick-N-Quick	2015	Non-cat Meat&Poultry 432.124*	Y	01/01/10	N	1	64	N/A	N/A	C	NC	C
Tyson of Rogers	2015	Non-cat Meat&Poultry 432.124*	Y	01/01/10	N	1	56	N/A	N/A	C	C	C

*Non-point, only required to comply with 40 CFR 403

IV. Attachment B

2011 SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS

INDUSTRIAL USER	NATURE OF VIOLATION		NUMBER OF ACTIONS TAKEN					PENALTIES COLLECTED	COMPLIANCE SCHEDULE		CURRENT STATUS	COMMENTS
	REPORTS	LIMITS	N.O.V.	A.O.	CIVIL	CRIMINAL	OTHER		DATE ISSUED	DATE DUE		
Bekaert Steel		1	1								C	June-Copper(b)
Kennametal		2	2								C	Apr.-Copper(b)&(d)
Model Laundry		1	1								C	Oct.-O/G(d)
Preformed Line		2	2								C	Aug.-O/G(d); Oct.-O/G(d)
Southeast Poultry		1	2								C	Apr.-O/G(c); Oct.-(m)
Tyson Chick-N-Quick	1	1	2								C	June-(n); July-pH(i)

a. Daily Maximum Concentration	e. TRC Daily Maximum Concentration	i. Low pH	m. Failure to Operate Pretreatment, Spill to Ground
b. Daily Maximum Loading	f. TRC Daily Maximum Loading	j. High pH	
c. Monthly Average Concentration	g. TRC Monthly Average Concentration	k. Late Reports	n. Failure to adequately monitor/tampering with self-monitoring
d. Monthly Average Loading	h. TRC Monthly Average Loading	l. Monitoring Frequency	

V. Attachment C

2011 PRETREATMENT PERFORMANCE SUMMARY (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

A. General Information

Control Authority Name	City of Rogers		
Address	4300 Rainbow Road		
City	Rogers	State / Zip	Arkansas 72758-1440
Contact Person	Paul N. Burns, Pretreatment Coordinator		
Contact Telephone	(479) 273-7378 x109		
NPDES Permit No.	AR0043397		
Reporting Period	January 1, 2011 through December 31, 2011		
Total Number of Categorical IUs	5		
Total Number of Significant Non-categorical IUs	7		

B. Significant Industrial User Compliance

	Significant Industrial Users	
	Categorical	Non-Categorical
1) No. of SIUs Submitting BMRs/Total No. Required	0 / 0	N / A
2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required	0 / 0	0 / 0
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required	5 / 5	7 / 7
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule	0 / 0	0 / 0
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	0 / 5	0 / 7
6) Rate of Significant Noncompliance for all SIUs (Categorical and Non-Categorical)	0 / 12	

C. Compliance Monitoring Program

	Significant Industrial Users	
	Categorical	Non-Categorical
1) No. of Control Documents Issued/ Total No. Required	0 / 5	0/ 7
2) No. of Non-sampling Inspections Conducted	5	7
3) No. of Sampling Visits Conducted	8	12
4) No. of Facilities Inspected (non-sampling)	5	7
5) No. of Facilities Sampled	5	7

D. Enforcement Actions

	Significant Industrial Users	
	Categorical	Non-Categorical
1) No. of Compliance Schedules Issued/No. of Schedules Required	0 / 0	N / A
2) No. of Notices of Violation Issued to SIUs	5	5
3) No. of Administrative Orders Issued to SIUs	0	0
4) No. of Civil Suits Filed	0	0
5) No. of Criminal Suits Filed	0	0
6) No. of Significant Violators (attach newspaper publication)	0	0
7) Amount of Penalties Collected (total dollars/IUs assessed)	0 / 0	0 / 0
8) Other Actions (sewer bans, etc.)	0	0

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

Paul M Burns 1/25/12

Authorized Representative Date

VI. Significant Violator Newspaper Publication

There were no Industrial Users listed in the newspaper as significantly noncompliant of permit requirements for the 2011 reporting period.

VII. Pretreatment Program Overview

A. Industrial User List

The Control Authority for the City of Rogers identified and properly characterized five Categorical Significant Industrial Users (SIUs), eight Non-categorical SIUs and two Non-Significant Industrial Users. A list of Industrial Users follows.

Significant Categorical

Name	NAIC Code	40 CFR Category	Monitored Process Flow* (gpd)	% of Total IU Process Flow	Permit ID
Bekaert Steel	314992	433.17 & 420.96	18,630	1.73%	10-BSC
Kennametal	333515	471.54	16,900	1.57%	10-KMT
MAFCO	332919	433.17	1,650**	0.15%	10-MFC
Preformed Line Products	335932	467.55	7,260	0.68%	10-B-PLP
Superior Industries	331521	433.17	106,120	9.88%	10-SII

*Normal production day
**Batch discharge 1/week

Significant Non-categorical

Name	NAIC Code	40 CFR Category	Monitored Process Flow** (gpd)	% of Total IU Process Flow	Permit ID
Glad Manufacturing	326111		31,920	2.97%	10-GMC
Model Laundry	812320		11,200	1.04%	10-MLD
Ozark Mountain Poultry	311615	432.126*	76,720	7.15%	10-OMP
Pel-Freez Arkansas	311615	432.54*	28,260	2.63%	10-PFM
Southeast Poultry	311615	432.126*	41,080	3.83%	10-SEP
Tyson Chick 'N Quick	311615	432.124*	401,390	37.39%	10-TCQ
Tyson of Rogers	311615	432.124*	326,030	30.37%	10-TOR

* Only required to comply with 40 CFR 403
**Normal production day

Non-Significant

Name	NAIC Code	40 CFR Category	Process Flow (gpd)	% of Total IU Process Flow	Permit ID
Cryovac	326111		3,400	0.32	CSA MOA-11
Harris Baking			3,000	0.28	N/A

The sum of all the above listed IUs' flow is 1.074 million gpd – based on flow data from submitted DMRs. Updating Industrial User and non-domestic user information is an ongoing process, conducted at a frequency that adequately ensures that all Industrial Users are properly characterized at all times. Significant Non-categorical industries are assigned 40 CFR category numbers, but since they discharge to a POTW they are only required to comply with 40 CFR 403 – General Pretreatment Regulations for Existing and New Sources of Pollution.

B. Industrial Control Documents

The Control Authority issues permits to each Significant Industrial User to control the contribution to the POTW and to ensure compliance with applicable Pretreatment Standards and Requirements. All SIUs were issued new permits in 2010 after receiving permit renewal information and updating fact sheets.

C. Industrial Monitoring and Inspection Activities

Each SIU was Control Monitored at least once during the past pretreatment year by the Control Authority. Industries required to monitor for cyanide are only Control Monitored 1/year for that parameter. Sampling is usually initiated unannounced unless the industry is a batch discharger. Industrial Users' sampling techniques, auto-sampler programming, and flow meter settings and calibration are evaluated during these activities. Collecting representative samples, using clean sampling techniques, proper pour up and preservation techniques, and following chain of custody guidelines is emphasized to the IU representative. All Industrial Users carry out self-monitoring on a monthly basis or frequency dictated by their permit. Industries increase the frequency of sampling when temporary upsets occur in order to avoid NOV's or higher surcharge fees. The Control Authority inspected all permitted Industrial Users once during 2011.

D. Industrial Compliance Status

The Control Authority enforces and obtains remedies for Industrial User noncompliance through the use of applicable pretreatment standards and requirements.

Compliant (C): The following six Industrial Users were compliant with permit and reporting requirements: Glad Manufacturing, MAFCO, Ozark Mt. Poultry, Pel-Freez Arkansas, Superior Industries, and Tyson of Rogers.

Noncompliant (NC): The following six Industrial Users were noncompliant with permit requirements: Bekaert Steel, Kennametal, Model Laundry, Preformed Line Products, Southeast Poultry, and Tyson Chick-N-Quick.

1) Bekaert Steel (BSC) was in violation in June during which Copper loading exceeded the Daily Maximum Load Limit on one occasion.

2) Kennametal (KMT) was in violation in April during which Copper loading exceeded both the Daily Maximum Load and the Monthly Average Loading Limits. KMT self monitored for copper 04/12-13/11 and the result was well within limits. Control Monitoring on 04/18-19/11 found copper, along with other metals and TSS, much higher than the previous self-monitored sample. KMT has since added numerous cutting fluid coolant sedimentation silos in order to capture as much reusable tungsten carbide. This also prevents effluent metal levels from exceeding permit limits.

3) Model Laundry (MLD) was in violation in October during which Oil/Grease loading exceeded the monthly average loading limit.

4) Preformed Line Products (PLP) was in violation in August and October. Oil/Grease (O/G) sampling resulted in a monthly average loading that exceeded the oil/grease monthly average

loading limits. PLP was issued an NOV for each of the violations. PLP is continuing to research how to improve Oil/Grease removal so as to reduce loading to the sanitary sewer.

5) Southeast Poultry (SEP) was in violation in April for Oil/Grease exceeding the monthly average concentration limit. SEP was in violation in October for failing to operate pretreatment which resulted in a spill to the ground. Heavy rain resulted in stormwater entering the west side of the facility. The stormwater was automatically pumped to the 73,000 gallon aeration basin and then spilled over the top of the tank. The spill occurred on a Saturday, SEP personnel where not on site or aware of the spill until the following Monday morning. The spill was reported to the Fayetteville ADEQ field office. SEP is working to reduce storm water infiltration and has made several procedural changes to prevent aeration tank overflows.

6) Tyson Chick-N-Quick (TCQ) was in violation in June for failure to adequately monitor and tampering with self-monitoring. An internal investigation at TCQ determined that the wastewater manager was somehow tampering with self-monitoring in order to avoid paying surcharges for CBOD. Evidence collected indicated this had been going on anywhere from three to six months. The employee resigned and the investigation determined that no other individuals were involved or had knowledge of the monitoring interference. Tyson Foods then performed a review of the wastewater SOPs, process control program and training program at TCQ. Because Tyson was proactive, permit limits were not violated, the POTW was not significantly impacted and the improper activity was limited to a single individual, the penalty is being limited to a single NOV. If the circumstances were more severe the enforcement actions would have resulted in administrative fines and public notice.

TCQ was also in violation for pH < 5.0 at the end of the July monitoring period.

Significant Noncompliant (SNC): There were no Industrial Users in significant noncompliance of permit requirements for the 2011 reporting period.

E. General Pretreatment Regulation Requirements

Based on the information available to the Control Authority, there was no interference, pass through, upset, or POTW permit violation that was known or suspected to be caused by industrial contributors. There were no known new pollutants introduced into the treatment works from an indirect discharger. There were also no substantial changes in the volume or character of pollutants being introduced into the treatment works by an existing collection system source.

F. POTW Analytical Results Discussion

Expansion of the wastewater treatment facility was completed in March 2009. The POTW's annual average daily flow rates in MGD are included in the following table. These flow rates are influenced by population growth, stormwater infiltration, and economic trends. The table below shows total effluent flow, flow to the creek at location 001, and flow to the golf course at location 002.

RPCF Effluent Flows in MGD – Average Daily Flow

Year	Eff Total	Eff 001	Eff 002
2003	6.142	5.765	0.378
2004	6.840	6.454	0.386
2005	6.340	5.835	0.505
2006	6.315	5.695	0.621
2007	7.082	6.600	0.482
2008	9.169	9.016	0.153
2009	7.752	7.058	0.694
2010	7.152	6.198	0.954
2011	7.667	6.772	0.895

Metals monitoring includes all pollutants listed in 40 CFR 122 Appendix D, Table III. All Table III pollutants were monitored for on four occasions during 2011, including phenols and cyanide. Refer to section II. A. for the tabulated results. Annual influent and effluent priority pollutant scans were conducted in June. The priority pollutant scan includes all parameters listed in 40 CFR 122 Appendix D, Table II. Only chloroform was reported above detection limits for the influent at a level of 10.6 ppb but NOT the effluent. Refer to section II. B. for the tabulated results.

Biosolids were monitored for total metals, cyanide, phenolics, pH, %TS&%VS, vector attraction, fecal coliform, and nutrients as required by permit during 2011. The sludge was dewatered with a centrifuge and then hauled off site to a land application site in Kansas. On average, the sludge was dewatered to 18.88% Total Solids. The total amount of sludge hauled off for 2011 was 8493 tons, or 1603.4 tons dry weight. This calculates out to 4.393 dry tons produced per day.

CBOD, TSS, nutrients (NH_3-N, NO_3-N, TN-N, TP-P, and PO_4-P), and O/G analyses were performed on POTW influent and effluent, and IU samples. Fecal coliform is performed on POTW effluent. All results are entered into the POTW's database. The data is reviewed and trended throughout the year. Influent monitoring is occasionally influenced by return flows from various treatment plant processes including: centrate from the centrifugation of biosolids, sand filter backwash, and occasional RAS.

Total Phosphorus (TP) is a major pollutant of concern due to its impact on receiving stream quality. The following table compares TP loading from SIUs with RPCF influent and effluent loading for the years 2007 to 2011. Only the top five TP contributors are listed individually. Influent TP loading continues to decrease since 2008 with 2011 being even lower than 2007. The effluent TP load for 2011 is the lowest of all the years listed. This is most likely due to decreases in influent loading, the improvements made during the 2009 expansion and good process control carried out by the RPCF Operations staff. TOR continues to decrease its loading impact, and although not apparent in the table below, has drastically decreased its phosphorus load in December 2011 and January 2012. In 2008, SIUs accounted for 18.4% of the TP load; in 2010 – 15.7%, and in 2011 – 15.9%.

Total Phosphorus Loading in lbs/day: Significant Industrial Users' Impact

Year	SEP	OMP	SII	TCQ	TOR	All SIUs	Influent	Effluent
2007	N/A	4.0	5.4	8.4	48.9	73.3	430	42.3
2008	N/A	5.1	5.4	15.8	55.1	86.0	467	58.8
2009	N/A	6.2	9.4	10.9	44.8	70.5	450	16.5
2010	2.7	5.8	6.5	15.2	35.9	68.7	437	18.7
2011	2.97	10.59	7.93	9.73	26.91	61.64	388.8	13.70

Variation in water usage was related to an increase in irrigation in dry years and a decrease in irrigation in wet years. The following table displays water usage trends from 2005 to 2011. The economic recession of 2008 and 2009 influenced the decrease in water usage for all categories. For 2010 residential and commercial usage increased while industrial usage slightly decreased. For 2011, both residential and commercial usage was at record levels. Industrial water usage slightly increased in 2011 with multiple industries increasing production levels.

City of Rogers - Water Usage Trends

Annual Totals in Millions of Gallons

Year	Residential	Commercial	Industrial	Misc	Total	% Industrial
2005	1423.637	558.104	602.642	126.301	2709.684	22.24
2006	1499.065	617.313	596.850	144.167	2857.395	20.89
2007	1383.482	622.497	599.425	176.410	2781.813	21.55
2008	1273.620	594.753	603.792	152.923	2625.088	23.00
2009	1315.206	580.440	521.372	141.136	2558.154	20.38
2010	1443.800	638.200	516.594	96.578	2694.771	19.16
2011	1517.844	663.668	530.470	78.273	2790.256	19.01

G. Oil and Grease Abatement

The City of Rogers is committed to protecting the collection system from excess fats, oils, and greases (FOG) in order to prevent blockages and overflows. The Rogers Water Utilities performs the following FOG program duties:

1) New construction and renovation plans for food service businesses are reviewed on a continual basis to ensure that the facilities are plumbed properly;
2) Food service businesses are evaluated to determine grease interceptor sizing; and new grease interceptor installations are inspected prior;
3) Grease interceptors are sized according to the food served, number of patrons, hours of operation and number of grease-generating appliances and appurtenances.
4) On-site inspections at existing food service establishments are performed to ensure compliance with grease abatement regulations and to address problem areas.
5) Other businesses that contribute oils and greases into the sanitary sewer system, such as car washes and auto maintenance shops, are also of concern. These businesses are evaluated to determine if oil/water interceptors are required.

The type of waste, volume and consequent loading in Rogers, continues to shift more towards a domestic and service-based waste versus industrial and hazardous waste. This shift continues to present a challenge of keeping the Non-Significant Industrial Users and service-based businesses informed and compliant with pollution prevention guidelines. This pretreatment program is committed to addressing this challenge. In 2011 the City of Rogers FOG Program Manual was drafted and will be reviewed and revised as needed.

H. Surcharge Summary

Surcharge fees are assessed for each day TSS or CBOD results are above 300 mg/L. The number of days for the surcharge is determined by the total number of operational days between known concentrations below 300 mg/L. Surcharge fees are collected to cover the extra operational cost associated with higher strength waste. Surcharge fees are not considered violations.

		Penalties		
Month	Industry	CBOD	TSS	Oil/Grease
Jan.	SEP	$ 25.72		
Feb.	TOR	$ 285.76		
Mar.	SEP	$ 198.40	$ 58.96	$ 111.37
Apr.	KMT		$ 545.71	
	SEP	$ 133.04	$ 13.96	$ 26.36
	TOR	$ 246.50		
May	OMP		$ 307.56	
June	MLD	$ 23.31		$ 67.73
July	MLD	$ 282.90		$ 24.82
	SEP	$ 74.21		
	TCQ	$ 1,062.90		
Sept.	SEP	$ 582.50		
	TCQ	$ 491.06		
Aug.				
Oct.	MLD	$ 80.11		$ 49.16
	OMP		$ 157.17	
	TOR	$ 299.56		
Nov.	MLD		$ 163.27	
	TCQ	$ 1,182.97		
	TOR	$ 239.60		
Dec.	SEP	$ 94.84		
	TCQ	$ 2,070.64		
	TOR	$ 240.66		
Totals		**$ 7,614.68**	**$ 1,246.63**	**$ 279.44**

I. Pretreatment Audit

The last major pretreatment program audit was conducted by Arkansas Department of Environmental Quality June 13-15, 2011. ADEQ was represented by Mr. Allen Gilliam, State Pretreatment Coordinator. ADEQ required the City to have all permitted IU's review and revise both descriptions and diagrams of operations. All IU's have been made aware of this requirement and are to make submittals by April 1st, 2012. ADEQ also required that an IU master list be implemented and that IU surveys be given more attention. A rough draft of the master list has been prepared and IU surveys will be sent out to as many non-permitted IU's as possible in 2012. The Rogers Pretreatment Program is currently compliant with all pretreatment requirements.

J. Pollution Prevention (P^2) Assessment Update

The Rogers pretreatment program continues to make common sense pollution prevention measures a high priority. All Industrial Users are kept apprised of any new or revised regulation and the potential impact the regulation could have on the industry. All significant industries in Rogers have P2 plans. Industries review and/or revise their P2 plans on an annual basis. Industrial Users are encouraged to examine the production process for potential losses of material, energy, and water and then develop and implement improvements. Several industries in Rogers have obtained ISO 14001 Environmental Certification or are working to do so.

VIII. City of Rogers Industrial Pretreatment Contacts

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