

## Jamie Belcourt (adpce.ad)

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**From:** Jamie Belcourt (adpce.ad)  
**Sent:** Tuesday, January 31, 2023 2:06 PM  
**To:** 'Paul Burns'  
**Cc:** Brent Dobler; Todd Beaver; Patrick Pruitt; Amber Owens; Stacie Wassell (adpce.ad); Richard Healey (adpce.ad); David Ramsey (adpce.ad)  
**Subject:** City of Rogers' January 2022 – December 2022 Pretreatment Program Annual Report (NPDES Permit AR0043397)

Hello,

The City of Rogers' January 2022 – December 2022 Pretreatment Program Annual Report (NPDES Permit AR0043397) was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 C.F.R. § 403.12(i).

Thank you for your timely submittal. If you have any questions or concerns on this matter, please feel free to contact me.

Best,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality**  
**Policy and Administration**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0858 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

**ANNUAL PRETREATMENT PROGRAM STATUS REPORT**

for the

**CITY OF ROGERS, ARKANSAS**

**January 2022 - December 2022**

Permit No. AR0043397



Submitted to

Arkansas Energy & Environment

Department of Environmental Quality

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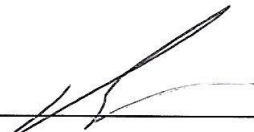
I. Certification

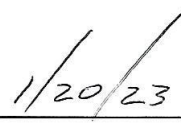
NPDES Permit Holder: City of Rogers  
Report Date: January 27<sup>th</sup>, 2023  
Reporting Period: January 2022 – December 2022  
POTW: Rogers Pollution Control Facility  
Address: 4300 Rainbow Road  
Rogers, AR 72758-1440  
NPDES Permit Number: AR0043397 – AFIN 04-00155  
Effective Date: March 1, 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 x306  
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.*

  
\_\_\_\_\_  
Brent Dobler  
Utilities Superintendent  
Rogers Water Utilities

  
\_\_\_\_\_  
Date

**II. A. MONITORING RESULTS TABLE III POLLUTANTS CALENDAR YEAR 2022**  
**AVERAGE POTW FLOW in MGD: L001 = 9.338, L002 = 0.901, TOTAL = 10.239 % SIU FLOW = 8.88**

METALS, CYANIDE & PHENOLS	Units	MAHC µg/L	Influent Mar 01-02	Influent May 17-18	Influent Sept 06-07	Influent Nov 01-02	WQ Lvl Limit µg/L	Effluent Mar 02-03	Effluent May 18-19	Effluent Sept 07-08	Effluent Nov 02-03
Antimony	µg/L	na	<2.08	<2.08	<2.08	<2.08	na	<2.08	<2.08	<2.08	<2.08
Arsenic	µg/L	25.0	0.35	0.30	0.55	0.53	504	<0.26	0.26	0.31	0.34
Beryllium	µg/L	na	<0.26	<0.26	<0.26	<0.26	na	<0.26	<0.26	<0.26	<0.26
Cadmium	µg/L	19.0	<0.26	<0.26	<0.26	<0.26	10.30	<0.26	<0.26	<0.26	<0.26
Chromium	µg/L	528	1.89	1.20	1.30	1.15	1847	0.50	0.47	0.30	0.37
Copper	µg/L	678	14.4	13.7	26.8	17.0	60.5	1.01	1.14	0.74	2.92
Lead	µg/L	71.0	0.45	0.42	0.49	0.34	27.6	<0.26	<0.26	<0.26	0.85
Mercury	µg/L	0.8038	0.0015	0.0081	0.0133	0.0081	0.01670	0.00070	<0.00061	<0.00050	<0.00050
Molybdenum	µg/L	53.0	1.5	0.74	1.46	1.06	na	0.94	0.71	<0.603	<0.603
Nickel	µg/L	19.0	3.35	3.10	3.36	3.04	621	1.53	2.02	1.77	29.4
Selenium	µg/L	16.0	<2.08	<2.08	<2.08	<2.08	8.28	<2.08	<2.08	<2.08	<2.08
Silver	µg/L	100	<0.26	<0.26	<0.26	<0.26	25.0	<0.26	<0.26	<0.26	<0.26
Thallium	µg/L	na	<0.26	<0.26	<0.26	<0.26	na	<0.26	<0.26	<0.26	<0.26
Zinc	µg/L	500	87.9	76.0	91.1	88.2	460	21.5	20.8	<20.0	46.8
Cyanide	µg/L	27.0	<10	<10	<10	<10	8.5	<10	<10	<10	<10
Phenols	µg/L	na	40	38	50	47	na	<5.0	<5.0	<5.0	<5.0

Laboratory Analysis 2021		
EPA Method	Lab PQL µg/L	EPA MQL µg/L
200.8	2.00	60
200.8	0.26	0.5
200.8	0.26	0.5
200.8	0.26	0.5
200.8	0.26	10.0
200.8	0.26	0.5
200.8	0.26	0.5
1631	0.00050	0.005
200.8	0.60	na
200.8	0.26	0.5
200.8	2.08	5
200.8	0.26	0.5
200.8	0.26	0.5
200.8	20.0	20
4500CN BE	10	10
420.1	5	5

Antimony	lb/day	na	0.212	0.184	0.178	0.174	na	0.185	0.186	0.163	0.150
Arsenic	lb/day	2.136	0.036	0.026	0.047	0.044	43.1	0.023	0.023	0.024	0.024
Beryllium	lb/day	na	0.026	0.023	0.022	0.022	na	0.023	0.023	0.020	0.019
Cadmium	lb/day	1.624	0.026	0.023	0.022	0.022	0.880	0.023	0.023	0.020	0.019
Chromium	lb/day	45.12	0.192	0.106	0.111	0.096	158	0.044	0.042	0.024	0.027
Copper	lb/day	57.93	1.466	1.210	2.292	1.424	5.17	0.090	0.102	0.058	0.210
Lead	lb/day	6.067	0.046	0.037	0.042	0.028	2.36	0.023	0.023	0.020	0.061
Mercury	lb/day	0.0687	0.0002	0.0007	0.0011	0.0007	0.00143	0.0001	0.0001	0.0000	0.0000
Molybdenum	lb/day	4.529	0.153	0.065	0.125	0.089	na	0.083	0.064	0.047	0.043
Nickel	lb/day	1.624	0.341	0.274	0.287	0.255	53.1	0.136	0.180	0.139	2.118
Selenium	lb/day	1.367	0.212	0.184	0.178	0.174	0.707	0.185	0.186	0.163	0.150
Silver	lb/day	8.545	0.026	0.023	0.022	0.022	2.13	0.023	0.023	0.020	0.019
Thallium	lb/day	na	0.026	0.023	0.022	0.022	na	0.023	0.023	0.020	0.019
Zinc	lb/day	42.72	8.947	6.712	7.790	7.389	39.3	1.909	1.855	1.568	3.372
Cyanide	lb/day	2.307	1.018	0.883	0.855	0.838	0.726	0.888	0.892	0.784	0.721
Phenols	lb/day	na	4.072	3.356	4.276	3.937	na	0.444	0.446	0.392	0.360

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 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 FPC samples including Hg. Loadings limits for MAHL and WQL calculated using the average yearly sum of L001&L002 flows = 10.239 MGD.

Flow	MGD	INF	12.205	10.590	10.253	10.045	EFF	10.644	10.695	9.400	8.640
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**II. C. RPCF 2022 Priority Pollutant Scan - 40 CFR 122 Appendix D Table II**

Name	CAS No.	Molecular Formula	Type	Influent mg/L	Effluent mg/L	Req MQL
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*Base/Neutral and Acid all not detected for Influent or Effluent*  
*VOC and Pest/PCB all not detected for Influent or Effluent*  
*Influent Grab Samples for VOC, BNA and Pest/PCB collected 05/17/22*  
*Effluent Grab Samples for VOC, BNA and Pest/PCB collected 05/18/22*

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  
2022 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC Code	NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status Reports (N/A, C, NC, or SNC)				Permit Limits (Violations)
				Y/N	Last Action				BMR	90 – Day Compliance	Semi Annual	Self Monitoring	
Bekaert Steel	2296, 3315	331222, 314994	433.17 & 420.96	Y	01/01/18	N	1	13	N/A	N/A	C	C	C
Glad Manufacturing	2671, 2673	326111	N/A	Y	01/01/18	N	1	5	N/A	N/A	C	C	C
Kennametal	3545	333515	471.54	Y	01/01/19	N	1	13	N/A	N/A	C	C	C
Ozark Mt. Poultry	2015	311615	432.126 <sup>A</sup>	Y	09/01/20	N	1	37	N/A	N/A	C	C	NC Aug. – CBOD
Pel-Freez Arkansas	2015	311611	432.54 <sup>A</sup>	Y	01/01/21	N	1	05	N/A	N/A	C	C	C
Preformed Line Products	3644	335932	467.55	Y	06/01/22	N	1	19	N/A	N/A	C	C	*NC Feb., Mar., Apr., May – Zinc
Southeast Poultry	2015	311615	432.126 <sup>A</sup>	Y	09/01/20	N	1	41	N/A	N/A	C	C	NC Mar. – CBOD
Tyson Chick'N Quick	2015	311615	432.124 <sup>A</sup>	Y	01/01/18	N	1	53	N/A	N/A	C	C	C
Tyson of Rogers	2015	311615	432.124 <sup>A</sup>	Y	01/01/18	N	1	41	N/A	N/A	C	C	NC March – CBOD, T-phos
WestRock	2653	322211	N/A	Y	01/01/20	N	1	12	N/A	N/A	C	NC Oct. – No sample	C

<sup>A</sup> Non-point, only required to comply with 40 CFR 403

\* PLP violation for Zinc loading were due to misreporting the monthly production levels – it was not apparent that production had increased by more than 20%. Once the permit was modified in May, PLP had no more violations.

**Attachment B**  
**2022 SIGNIFICANT NON-COMPLIANT (SNC) - ENFORCEMENT ACTIONS TAKEN**

SIU	Nature of Violation		NUMBER OF ACTIONS TAKEN					Penalties Collected	Compliance Schedule		Current Status	Comments
			Date Issued	Date Due								
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other					

Note:

a. Daily Maximum Concentration	e. TRC Daily Maximum Concentration	i. Low pH	m. Failure to monitor 1 or more permit parameters
b. Daily Maximum Loading	f. TRC Daily Maximum Loading	j. High pH	n. Discharge of sewage or polluted waters into natural outlets
c. Monthly Average Concentration	g. TRC Monthly Average Concentration	k. Late Reports	o. Failure to notify of an operational upset(s) within 24 hours
d. Monthly Average Loading	h. TRC Monthly Average Loading	l. Monitoring Frequency	p. Failure to properly maintain and operate pretreatment

Comments:



## IV. Attachment C

### 2022 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 x306

NPDES Permit No. AR0043397

Reporting Period January 1, 2022 through December 31, 2022

Total Number of Categorical IUs 3

Total Number of Significant Non-categorical IUs 7

#### B. Significant Industrial User Compliance

	Significant Industrial Users	
	<u>Categorical</u>	<u>Non-Categorical</u>
1) No. of SIUs Submitting BMRs/Total		
No. Required	<u>0 / 0</u>	<u>n / a</u>
2) No. of SIUs Submitting 90-Day Compliance		
Reports/No. Required	<u>0 / 0</u>	<u>n / a</u>
3) No. of SIUs Submitting Semiannual Reports/		
Total No. Required	<u>3 / 3</u>	<u>7 / 7</u>
4) No. of SIUs Meeting Compliance Schedule/		
Total No. Required to Meet Schedule	<u>0 / 0</u>	<u>0 / 0</u>
5) No. of SIUs in Significant Noncompliance/		
Total No. of SIUs	<u>0 / 3</u>	<u>0 / 7</u>
6) Rate of Significant Noncompliance for all		
SIUs (Categorical and Non-Categorical)	<u>0 / 10</u>	

C. Compliance Monitoring Program

	Significant Industrial Users	
	<u>Categorical</u>	<u>Non-Categorical</u>
1) No. of Control Documents Issued/Total No. Required	<u>3 / 3</u>	<u>7 / 7</u>
2) No. of Non-sampling Inspections Conducted	<u>3</u>	<u>7</u>
3) No. of Sampling Visits Conducted	<u>3</u>	<u>20</u>
4) No. of Facilities Inspected (non-sampling)	<u>3</u>	<u>7</u>
5) No. of Facilities Sampled	<u>3</u>	<u>7</u>

D. Enforcement Actions

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

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 N Burns  
 Authorized Representative

01/24/2022  
 Date

## Significant Violator Newspaper Publication

There were no significant violators for 2022.

## Pretreatment Program SIU Flows

The flows below are based on the wastewater flow measured at each SIU's monitoring location. Kennametal and Glad are mixed with sanitary wastewater, unlike all the other SIUs. Bekaert's process flow does not include cooling tower overflow. The flows are list as million gallons (MG).

SIU Monthly Total Process Discharge Flow 2022										
Month	Bekaert	Glad	Kennametal	Ozark Mt	Pel-Freez	Preformed	SE Poultry	Tyson CQ	Tyson Rog	W Rock
Jan-22	0.544195	0.643904	0.433342	3.552332	0.134284	0.048600	3.486064	6.696500	4.721689	0.072800
Feb-22	0.497614	0.674247	0.569141	3.162524	0.145170	0.026900	2.203893	5.038680	4.119628	0.057200
Mar-22	0.666382	0.820782	0.838068	3.802708	0.224513	0.034600	3.119013	8.326320	4.283206	0.078000
Apr-22	0.737121	0.947320	0.897976	3.576847	0.183344	0.032500	2.547405	9.325120	4.726991	0.059800
May-22	0.731171	1.182270	0.976626	3.641114	0.231772	0.030400	2.654379	6.787030	4.656969	0.057200
June-22	0.730733	0.849801	0.953985	3.846384	0.250657	0.033900	2.762053	7.339330	5.476130	0.067600
July-22	0.585646	0.864538	0.921513	3.706263	0.198908	0.031100	2.801276	7.122340	5.761270	0.057200
Aug-22	0.613621	1.560000	0.956366	4.161000	0.286614	0.034600	3.120730	6.181620	6.087820	0.072800
Sept-22	0.498531	0.969003	0.722439	3.523154	0.239033	0.034600	2.374302	5.574550	5.931620	0.062400
Oct-22	0.710158	0.658101	0.853846	3.637704	0.174252	0.031100	2.024395	6.476060	5.536982	0.057200
Nov-22	0.704797	0.916278	0.905005	3.640434	0.187709	0.046000	1.619214	5.411090	5.950590	0.051802
Dec-22	0.482182	0.753651	1.125641	3.413918	0.171153	0.032500	1.448028	5.386630	5.059770	0.048075
Sum	7.502151	10.839895	10.153948	43.664382	2.427409	0.416800	30.160752	79.665270	62.312665	0.742077
Mean	0.625179	0.903325	0.846162	3.638699	0.202284	0.034733	2.513396	6.638773	5.192722	0.061840
Daily Mean	0.021490	0.023856	0.029270	0.161041	0.016200	0.003780	0.110725	0.237892	0.222212	0.002728
Days/Month	30	30	29	24	13	20	23	28	24	24

The sum of daily SIU's flows is estimated at 0.829 MG which is slightly up from 0.826 MG last year.

## City of Rogers Industrial Pretreatment Contacts

Company	Permit #	First Name	Last Name	Job Title	E-mail Address	Business Phone	Address
Bekaert Corp	18-BSC	Kirby	Mccalister	Envir Coord	kirby.mccalister@bekaert.com	479-621-7529	1 Bekaert Drive
Glad Manufacturing	18-GMC	Kris	Dueker	Envir Coord	kris.dueker@clorox.com	479-246-6319	1700 N 13th St
Glad Manufacturing	18-GMC	Jeremy	Engelhardt	EHS Support	Jeremy.engelhardt@clorox.com	479-246-6319	1700 N 13th St
Kennametal Inc	19-KMT	Jonathan	Hawkins	EHS Manager	jonathan.hawkins@kennametal.com	479-621-4726	205 N 13th St
Ozark Mountain Poultry	18-OMP.2	Tommy	Lewis	Maint Mngr	tommy.lewis@georgesinc.com	479-633-8600	750 West Easy St
Pel-Freez Arkansas	21-PFA	Theresa	Kwasny	Director of Quality	tkwasny@pel-freez.com	479-636-4361	219 N Arkansas St
Preformed Line Products	18-PLP	Lloyd	Brown	Lead Assessor/ Compliance Tech	lbrown@preformed.com	479-636-7600	2740 S 1st St
Southeast Poultry	18-SEP.2	Joseph	Nuckols	Plant Mngr	jnuckols@southeastpoultry.com	479-636-3600	2200 Town West Dr
Tyson Chick-N-Quick	18-TCQ	Jay	Lor	Complex Enviro Mngr	jay.lor@tyson.com	479-986-3216	400 W Olrich St
Tyson Chick-N-Quick	18-TCQ	Travis	Sartain	Sr. Supv. Enviro	travis.sartain@tyson.com	479-878-2152	400 W Olrich St
Tyson of Rogers	18-TOR	Bobby	Holman	Sr Supv Enviro	bobby.holman@tyson.com	479-636-1620	212 E Elm St
Tyson of Rogers	18-TOR	Skye	Rose	Complex Enviro Mngr	skye.rose@tyson.com	479-636-1620	
WestRock	20-WRK	Joshua	Moore	Enviro Safety Mngr	joshua.d.moore@westrock.com	479-636-7000	2021 S 5th St
WestRock	20-WRK	Rachel	Davis	Sr ES Mngr	rachel.g.davis@westrock.com	770-326-8141	2021 S 5th St

Updated 01/20/2023 by: Amber Owens and Paul Burns