ANNUAL PRETREATMENT PROGRAM STATUS REPORT

for the

CITY OF ROGERS, ARKANSAS

January 2008 – December 2008

Permit No. AR0043397

ldw

FEB - 2 2009

Good report.
No comments/actions necessary ~~AFS~~ KH

Submitted to
Arkansas Department of Environmental Quality (ADEQ)

Table of Contents

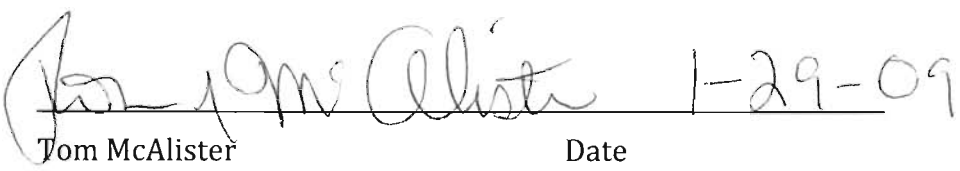
I. Certification

NPDES Permit Holder:	City of Rogers
Report Date:	January 15, 2009
Reporting Period:	January 2008 – December 2008
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.



Tom McAlister Date
General Manager
Rogers Water Utilities

II. A. MONITORING RESULTS TABLE III POLLUTANTS PART 1
REPORTING YEAR: JANUARY 2008 TO DECEMBER 2008

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

AVERAGE POTW FLOW: 9.080 MGD **% STORM WATER INFILTRATION: 25.3** **% IU FLOW: 15.6**

METALS, CYANIDE & PHENOLS (Total)	Units	Maximum Allowable Headworks Level µg/L	Influent Concentrations in µg/L Dates Sampled 01/07-08	03/10-11	04/15-16	06/24-25	Calculated WQ Level/ Limit µg/L	Effluent Concentrations in µg/L Dates Sampled 01/09-10	03/12-13	04/16-17	06/25-26	Laboratory Analysis First Half 2008 EPA Method	Detection Limit µg/L	EPA MQL µg/L
Antimony	µg/L	na	1.08	< 0.92	< 0.92	1.00	na	< 0.37	< 0.37	< 0.92	0.28	200.8	0.92	60
Arsenic	µg/L	25.0	0.86	< 0.74	< 0.74	1.20	504	0.40	< 0.30	< 0.30	0.32	200.8	0.30	0.5
Beryllium	µg/L	na	< 0.13	< 0.32	< 0.32	< 0.32	na	< 0.13	< 0.13	< 0.32	< 0.06	200.8	0.32	0.5
Cadmium	µg/L	19.0	0.14	< 0.06	< 0.06	0.10	10.30	0.24	< 0.02	< 0.02	< 0.04	200.8	0.04	0.5
Chromium	µg/L	528	170.0	2.15	0.70	2.75	1847	4.76	1.64	0.58	0.42	200.8	0.10	10.0
Copper	µg/L	678	41.6	30.1	10.6	34.0	60.5	3.00	2.28	2.34	0.94	200.8	0.06	0.5
Lead	µg/L	71.0	1.72	1.45	0.55	1.40	27.6	0.22	0.40	0.06	0.16	200.8	0.02	0.5
Mercury	µg/L	0.050	0.0890		0.1110		0.020	0.0031		0.0034		1631	0.0002	0.005
Molybdenum	µg/L	53.0	4.56	6.35	< 0.78	1.05	na	2.94	1.90	0.92	0.90	200.8	0.31	*NA*
Nickel	µg/L	19.0	29.9	3.65	1.20	3.50	621	17.20	3.14	1.40	1.42	200.8	0.10	0.5
Selenium	µg/L	16.0	< 1.40	< 3.50	< 3.60	< 3.60	8.20	< 1.4	< 1.4	< 1.4	< 0.40	200.8	1.4	5
Silver	µg/L	100	2.52	< 0.43	< 0.43	1.40	25.0	< 0.17	< 0.17	< 0.17	< 0.16	200.8	0.17	0.5
Thallium	µg/L	na	< 0.11	< 0.27	< 0.27	< 0.27	na	< 0.11	< 0.11	< 0.11	< 0.10	200.8	0.11	0.5
Zinc	µg/L	500	114	92.1	44.7	126	460	30.5	30.5	30.0	32.2	200.8	1.0	20
Cyanide	µg/L	27.0	< 10		< 10		8.5	< 10		< 10		4500-CN f	10	10
Phenols	µg/L	na	36		78		na	17		< 3.0		420.1	3.0	5
		Loading in kg/day					Loading in kg/day							
Antimony	kg/day	na	0.027	< 0.027	< 0.043	0.032	na	< 0.010	< 0.009	< 0.032	0.009			
Arsenic	kg/day	0.86	0.022	< 0.022	< 0.035	0.038	17.32	0.011	< 0.008	< 0.010	0.010			
Beryllium	kg/day	na	< 0.003	< 0.009	< 0.015	< 0.010	na	< 0.004	< 0.003	< 0.011	< 0.002			
Cadmium	kg/day	0.65	0.004	< 0.002	< 0.003	0.003	0.354	0.007	< 0.001	< 0.001	< 0.001			
Chromium	kg/day	18.1	4.303	0.063	0.033	0.087	63.48	0.132	0.042	0.020	0.013			
Copper	kg/day	23.3	1.053	0.883	0.496	1.082	2.079	0.083	0.058	0.081	0.029			
Lead	kg/day	2.44	0.044	0.043	0.026	0.045	0.949	0.006	0.010	0.002	0.005			
Mercury	kg/day	0.0017	0.00225		0.00519		0.00069	0.00009		0.00012				
Molybdenum	kg/day	1.82	0.115	0.186	< 0.036	0.033	na	0.081	0.048	0.032	0.028			
Nickel	kg/day	0.65	0.757	0.107	0.056	0.111	21.34	0.476	0.080	0.048	0.044			
Selenium	kg/day	0.55	< 0.035	< 0.103	< 0.168	< 0.115	0.282	< 0.039	< 0.036	< 0.048	< 0.012			
Silver	kg/day	3.44	0.064	< 0.013	< 0.020	0.045	0.859	< 0.005	< 0.004	< 0.006	< 0.005			
Thallium	kg/day	na	< 0.003	< 0.008	< 0.013	< 0.009	na	< 0.003	< 0.003	< 0.004	< 0.003			
Zinc	kg/day	17.2	2.885	2.702	2.091	4.009	15.81	0.845	0.776	1.035	1.006			
Cyanide	kg/day	0.93	< 0.253		< 0.468		0.292	< 0.277		< 0.345				
Phenols	kg/day	na	0.911		3.649		na	0.471		< 0.104				
Flow	MGD	INF	6.686	7.749	12.357	8.405	EFF	7.315	6.720	9.117	8.254			

MDL's for Influent may be higher if sample was diluted 5X instead of 2X prior to analysis.

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 flow 9.08 MGD.

II. A. MONITORING RESULTS TABLE III POLLUTANTS PART 2
REPORTING YEAR: JANUARY 2008 TO DECEMBER 2008

TREATMENT PLANT: City of Rogers **NPDES PERMIT NO. AR0043397**
AVERAGE POTW FLOW: 9.080 MGD **% STORM WATER INFILTRATION: 25.3** **% IU FLOW: 15.6**

METALS, CYANIDE & PHENOLS (Total)	Units	Maximum Allowable Headworks Level µg/L	Influent Concentrations in µg/L Dates Sampled 07/22-23	08/05-06	11/17-18	Calculated WQ Level/ Limit µg/L	Effluent Concentrations in µg/L Dates Sampled 07/23-24	08/06-07	11/18-19	Laboratory Analysis First Half 2008 EPA Method	Detection Limit µg/L	EPA MQL µg/L
Antimony	µg/L	na	< 0.92	< 0.92	0.52	na	0.42	0.44	0.12	200.8	0.06	60
Arsenic	µg/L	25.0	1.70	1.00	0.64	504	0.30	0.34	0.44	200.8	0.04	0.5
Beryllium	µg/L	na	< 0.32	< 0.32	< 0.06	na	< 0.06	< 0.06	< 0.06	200.8	0.06	0.5
Cadmium	µg/L	19.0	< 0.60	< 0.60	0.04	10.30	< 0.04	< 0.04	< 0.04	200.8	0.04	0.5
Chromium	µg/L	528	3.9	4.30	1.98	1847	0.24	0.46	0.20	200.8	0.10	10.0
Copper	µg/L	678	29.6	33.6	3.40	60.5	0.98	5.06	2.32	200.8	0.06	0.5
Lead	µg/L	71.0	1.90	2.30	1.44	27.6	0.14	0.12	0.18	200.8	0.02	0.5
Mercury	µg/L	0.050	0.1840		0.2040	0.020	0.0030		0.0102	1631	0.0002	0.005
Molybdenum	µg/L	53.0	1.70	1.60	1.06	na	0.90	1.10	0.88	200.8	0.10	*NA*
Nickel	µg/L	19.0	4.7	3.60	3.44	621	1.46	1.50	1.62	200.8	0.10	0.5
Selenium	µg/L	16.0	< 3.60	< 3.60	0.68	8.20	0.42	0.48	< 0.40	200.8	0.40	5
Silver	µg/L	100	1.15	1.40	0.28	25.0	< 0.16	< 0.16	< 0.16	200.8	0.16	0.5
Thallium	µg/L	na	< 0.27	< 0.27	< 0.10	na	< 0.10	< 0.10	< 0.10	200.8	0.10	0.5
Zinc	µg/L	500	151	170	97	460	30.5	23.7	45.1	200.8	1.0	20
Cyanide	µg/L	27.0	< 10		< 10	8.5	< 10		< 10	4500-CN f	10	10
Phenols	µg/L	na	196		21	na	23		< 5.0	420.1	5.0	5
		Loading in kg/day				Loading in kg/day						
Antimony	kg/day	na	< 0.030	< 0.027	0.014	na	0.014	0.015	0.003			
Arsenic	kg/day	0.86	0.056	0.029	0.018	17.32	0.010	0.011	0.012			
Beryllium	kg/day	na	< 0.010	< 0.009	< 0.002	na	< 0.002	< 0.002	< 0.002			
Cadmium	kg/day	0.65	< 0.019	< 0.017	0.001	0.354	< 0.001	< 0.001	< 0.001			
Chromium	kg/day	18.1	0.126	0.125	0.055	63.48	0.008	0.015	0.005			
Copper	kg/day	23.3	0.969	0.978	0.094	2.079	0.032	0.170	0.063			
Lead	kg/day	2.44	0.062	0.067	0.040	0.949	0.005	0.004	0.005			
Mercury	kg/day	0.0017	0.00603		0.00565	0.00069	0.00010		0.00028			
Molybdenum	kg/day	1.82	0.056	0.047	0.029	na	0.030	0.037	0.024			
Nickel	kg/day	0.65	0.152	0.105	0.095	21.34	0.048	0.050	0.044			
Selenium	kg/day	0.55	< 0.118	< 0.105	0.019	0.282	0.014	0.016	< 0.011			
Silver	kg/day	3.44	0.038	0.041	0.008	0.859	< 0.005	< 0.005	< 0.004			
Thallium	kg/day	na	< 0.009	< 0.008	< 0.003	na	< 0.003	< 0.003	< 0.003			
Zinc	kg/day	17.2	4.945	4.949	2.688	15.81	1.006	0.796	1.224			
Cyanide	kg/day	0.93	< 0.328		< 0.277	0.292	< 0.330		< 0.271			
Phenols	kg/day	na	6.42		0.582	na	0.758		< 0.136			
Flow	MGD	INF	8.652	7.691	7.321	EFF	8.711	8.869	7.168			

MDL's for Influent may be higher if sample was diluted 5X instead of 2X prior to analysis.

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 flow 9.08 MGD.

II. C. RPCF 2008 Priority Pollutant Scan - 40 CFR 122 Appendix D Table II

Name	CAS No.	Molecular Formula	Type	Influent mg/L	Effluent mg/L	Req MQL
Bromodichloromethane	75274	$CHBrCl_2$	VOC	< 0.0215	0.00063	0.010
Bromomethane (Methyl Bromide)	74839	CH_3Br	VOC	0.0116	0.00117	0.050
Chloroform	67663	$CHCl_3$	VOC	< 0.0215	0.00281	0.010
Chloromethane (Methyl Chloride)	74873	CH_3Cl	VOC	0.0275	< 0.00020	0.050
Dichlorodifluoromethane	75718	CCl_2F_2	VOC	0.00731	< 0.00015	*
Butylbenzylphthalate	85687	$C_{19}H_{20}O_4$	BNA	0.0192	<0.010	0.010

** Not listed in Table II but reported by contract lab.*
< Equivalent of not detected
Pest/PCB all not detected
Influent Grab Samples collected 11/17-18/2008
Effluent Grab Samples collected 11/18-19/2008
Influent VOC dilution factor 43

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

2008 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	11/01/07	N	1	14	N/A	N/A	C	C	C
Glad Manufacturing	2673	Non-categorical	Y	03/01/07	N	1	14	N/A	N/A	C	C	C
Kennametal	3545	Non-Ferrous Metals 471.54	Y	10/01/08	N	1	14	N/A	N/A	C	C	C
MAFCO	3443	Metal Finishing 433.17	Y	03/01/07	N	1	14	N/A	N/A	C	C	C
Model Laundry	7211	Non-categorical	Y	03/01/07	N	1	15	N/A	N/A	C	C	C
Ozark Mt. Poultry	2015	Non –cat Meat&Poultry 432.126*	Y	03/01/07	N	1	14	N/A	N/A	C	C	C
Pel-Freez Arkansas	2015	Non-cat Meat&Poultry 432.54*	Y	03/01/07	N	1	14	N/A	N/A	C	C	C
Preformed Line	3644	Aluminum Forming 467.55	Y	03/01/07	N	1	17	N/A	N/A	C	C	C
Strateline Ind.	2297	Non-cat, Textile Mills 410.86*	Y	11/30/07	Y	1	27	N/A	C	C	C	NC
Superior Ind. Int.	3363	Metal Finishing 433.17	Y	03/01/07	N	2	15	N/A	N/A	C	C	NC
Tyson Chick-N-Quick	2015	Non-cat Meat&Poultry 432.124*	Y	03/01/07	N	1	55	N/A	N/A	C	C	C
Tyson of Rogers	2015	Non-cat Meat&Poultry 432.124*	Y	03/01/07	N	1	89	N/A	N/A	C	NC	C

* only required to comply with 40 CFR 403

IV. Attachment B

2008 SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS

INDUSTRIAL USER	NATURE OF VIOLATION		NUMBER OF ACTIONS TAKEN					PENALTIES	COMPLIANCE SCHEDULE		CURRENT	
	REPORTS	LIMITS	N.O.V.	A.O.	CIVIL	CRIMINAL	OTHER	COLLECTED	DATE ISSUED	DATE DUE	STATUS	COMMENTS
Strateline		1	2								C	TSS (d,h)
Superior		1	1								C	pH (j)
Tyson	1		1								C	Sampling(l)

a. Daily Maximum Concentration
b. Daily Maximum Loading
c. Monthly Average Concentration
d. Monthly Average Loading
e. TRC Daily Maximum Concentration
f. TRC Daily Maximum Loading
g. TRC Monthly Average Concentration
h. TRC Monthly Average Loading
i. Low pH
j. High pH
k. Late Reports
l. Monitoring Frequency

V. Attachment C

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, 2008 through December 31, 2008		

Total Number of Categorical IUs 5

Total Number of Significant Noncategorical 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	1 / 1
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	5 / 5	7 / 7
2) No. of Non-sampling Inspections Conducted	6	7
3) No. of Sampling Visits Conducted	11	14
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	1	3
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
Authorized Representative

01/29/07
Date

VI. Significant Violator Newspaper Publication

There were no industrial users listed in the newspaper as significantly noncompliant of permit requirements for the 2008 reporting period.

VII. Pretreatment Program Overview

A. Industrial User List

The Control Authority for the City of Rogers identified and properly characterized five categorical, seven non-categorical significant industrial users (SIUs) and one non-significant industrial user. A list of industrial users follows.

Significant Categorical

Name	NAIC Code	40 CFR Category	Process Flow (gpd)	% of Total IU Process Flow	Permit ID
Bekaert Steel	314992	433.17 & 420.96	29,000	2.1	07-B-BSC
Kennametal	333515	471.54	9,500	0.7	08-KMT
MAFCO	332919	433.17	1,000	0.1	07-MFC
Preformed Line Products	335932	467.55	3,200	0.2	07-PLP
Superior Industries	331521	433.17	85,600	6.3	07-SII

Significant Non-Categorical

Name	NAIC Code	40 CFR Category	Process Flow (gpd)	% of Total IU Process Flow	Permit ID
Glad Manufacturing	326111		35,000	2.6	07-GMC
Model Laundry	812320		7,700	0.6	07-MLD
Ozark Mountain Poultry	311615	432.126*	85,000	6.3	07-OMP
Pel-Freez Arkansas	311615	432.54*	24,000	1.8	07-PFM
Strateline Industries	331521	410.86*	131,500	9.7	07-SLI
Tyson Chick 'N Quick	311615	432.124*	390,000	28.8	07-TCQ
Tyson of Rogers	311615	432.124*	545,000	40.2	07-TOR

* only required to comply with 40 CFR 403

Non-Significant

Name	NAIC Code	40 CFR Category	Process Flow (gpd)	% of Total IU Process Flow	Permit ID
Cryovac	326111		7,700	0.6	CSA MOA-08

Updating industrial user and nondomestic information is an ongoing process conducted at a frequency that adequately ensures that all industrial users are properly characterized at all times. Five existing significant non-categorical industries were 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. The industries assigned these numbers are Ozark Mountain Poultry, Pel-Freez Arkansas, Strateline Industries, Tyson Chick 'N Quick, and Tyson of Rogers.

B. Industrial Control Documents

The Control Authority issues permits to each industrial user to control the contribution to the POTW and to ensure compliance with applicable Pretreatment Standards and Requirements. All industrial users were issued new permits in 2007. Cryovac was removed from the permitting process and issued a Memorandum of Agreement (MOA) effective January 1, 2008. Kennametal was reissued a permit in October 2008 that corrected the production based limits. Superior Industries is undergoing restructuring and as of December 10, 2008, is named Superior Industries International Arkansas, LLC.

C. Industrial Monitoring and Inspection Activities

Each significant industrial user was monitored twice during the past pretreatment year by the Control Authority. Sampling is initiated unannounced unless the industry is a batch discharger. Industrial User sampling techniques, auto-sampler programming, and flow meter 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 are emphasized. 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 2008. Superior Industries was inspected a second time due to a low pH violation and to follow up on some questions related to the previous inspection. Emphasis was placed on updating facility diagrams and process schematics for all industries.

Additional industrial investigations were made at several industries including:

1) Kennametal – an unauthorized discharge of 522 gallons of 27% ethylene glycol to city sewer. Kennametal was required to submit a letter describing the incident and what measures would be taken to prevent its recurrence.

2) Superior Industries - DMR showed extremely low flows. A site visit confirmed that the flow meter was being poorly calibrated by Superior staff. The issue was addressed and Superior now supplies flow meter daily level minimums, maximums, and averages to the control authority.

3) Glad Manufacturing - red plastic resin beads were being discharged to the POTW. The material was similar to those found in a composite sample collected at Glad Manufacturing. A large quantity of plastic beads was found in the facilities lift station wet well. The plastic was traced back to a floor drain steel mesh trap that had a half inch gap on one side. The basket was modified to prevent the problem, and Haz-MERT of Rogers was called in to suction out the plastic beads in the wet well.

4) Bekaert Steel - Partial sludge blockage of 2800 feet of sewer line downstream of Bekaert Steel was investigated. There was concern that some of the material in the lines would be high zinc and/or copper. There was also concern that if it was forced/flushed downstream, it would slug the POTW. A sludge sample from manhole 1-679, just downstream of Bekaert, was analyzed for various metals and also calcium. The sample consisted of high amounts of calcium, iron, copper and zinc – materials that fit Bekaert's wastewater profile. The lines were vactored out by the RWU sewer crew and Bekaert was billed $9600.00. It is likely that the high amount of calcium in the sludge was from overfeeding hydrated lime for pretreatment pH adjustment. BSC switched from manually feeding hydrated lime to automatic feeding with a pH controller. Hopefully this has reduced the potential for lime to be over fed. It is also possible that an additional clarifier should be installed at Bekaert if future sewer line investigations show further sludge build up.

5) Preformed Line – A 4000 gallon non-categorical galvanized wire cleaning tank spilled, via a broken PVC pipe on the outside of the building, into the drainage ditch northwest of the pretreatment monitoring flume. The detergent in the tank was sodium hydroxide. The pretreatment coordinator required that Haz-MERT of Rogers be called upon to quickly clean up the spill. It started to rain during the clean up and 5700 gallons of contaminated storm water was suctioned from the ditch. Test results on the waste showed 9.08 mg/L Zinc, 2.34 mg/L Copper, and 0.044 mg/L Chromium. The cleaning tank waste typically contains between 6 to 12 mg/L Zinc.

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 nine industrial users were compliant with permit and reporting requirements: Bekaert Steel, Glad Manufacturing, Kennametal, MAFCO, Model Laundry, Ozark Mountain Poultry, Pel-Freez Arkansas, Preformed Line, and Tyson Chick-N-Quick.

Noncompliant (NC): The following three industrial users were noncompliant with permit requirements: Strateline Industries, Superior Industries, and Tyson of Rogers.

1) Tyson of Rogers had one violation in January for failing meet weekly monitoring requirements for TSS, CBOD, and T-Phos. TOR was issued an NOV. TOR had one violation in May for only collecting 2 out of 4 grab samples within 24 hours for Oil/Grease. TOR had collected 7 other Oil/Grease samples for the month even though they are only required to sample for O/G one process day per month . Historically TOR has maintained low Oil/Grease levels. TOR was issued an informal notice for the violation. TOR is now in compliance with all permit requirements.

2) Superior Industries had one violation in May for low pH. The pH was below 5.0 for 2.25 hours. SII was issued an NOV and is now in compliance with all permit requirements. SII now reports daily pH averages, minimums, and maximums with their monthly DMR. The data is obtained from a continuous pH probe that logs data to the SII flow meter.

3) Strateline Industries had two violations in November for exceeding the loading limit and TRC loading limit for TSS. This was due to a high flow of 214,330 gallons and a TSS concentration of 122 mg/L for location 003. SLI failed to perform subsequent sampling that could have lowered the monthly average and prevented the violation. SLI was issued an NOV for the two violations. SLI is now in compliance with all permit requirements.

Significant Noncompliant (SNC): There were no industrial users in significant noncompliance of permit requirements for the 2008 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 source.

F. POTW Analytical Results Discussion

Throughout 2008 construction took place to expand the wastewater treatment facility from a design flow of 6.7 to 14 MGD. An entire new treatment train was put in service at the end of October. Many existing facility systems were either retrofitted or completely replaced. Construction and modification will not be complete until March 2009. The construction made it

difficult to collect representative samples, especially towards the end of the year as construction progressed. Clean sampling techniques were potentially jeopardized by the close proximity of construction workers to sampling locations. The November effluent Mercury sample was probably contaminated by construction workers cutting pipes near the sampling location.

A major increase in rainfall influenced sample collection as well. The average flow rate for the receiving stream, Osage Creek, increased from 35.871 MGD (55.5 cfs) in 2007 to 61.788 MGD (95.6 cfs) in 2008. These flow measurements are from downstream of the POTW outfall so they include plant effluent flow. The increase in rain in turn also increased storm water infiltration. The POTW's average annual flow rate increased from 7.067 MGD in 2007 to 9.080 MGD in 2008. It was difficult to find a 48 hour period were the flow rates were below 8.0 MGD.

Metals monitoring includes all pollutants listed in 40 CFR 122 Appendix D, Table III. All Metals were monitored for seven times during 2008 except for mercury, phenols, and cyanide which were monitored for once per quarter. Refer to section II. A. & B. for the tabulated results. For methods, detection limits, and EPA MQLs, the highest detection limit for effluent is listed for the first half and second half of the year. Influent detection limits are not listed. For all metals except mercury, the effluent dilution factor was typically 2 while the influent dilution factor was typically 5. For mercury, the effluent was not diluted while the influent dilution factor was 5.

Annual influent and effluent priority pollutant scans were conducted in November. The priority pollutant scan includes all parameters listed in 40 CFR 122 Appendix D, Table II. There were three reported results above detection limits for the effluent. Refer to section II. C. for the tabulated results. There were no toxic organic compounds at concentrations greater than 0.01 mg/L. It was disappointing that the contract lab chose to dilute the influent sample by a factor of 43. This action increased the detection limits for the influent considerably.

Biosolids samples were monitored for TCLP metals, paint filter liquids test, TCLP priority pollutants, total metals, cyanide and phenolics as required by permit during 2008. No land application of biosolids was conducted in 2008. The sludge was dewatered in a centrifuge and then hauled off site to a permitted landfill.

New clean sampling techniques were developed for both composite and grab sampling. Brand new carboys, sample tubing, pump tubing, and sample line strainers were purchased. In the past only the carboys were acid washed and rinsed before use. During the fourth quarter, any sampling component that came in contact with the sample was thoroughly acid washed and rinsed with DI water.

CBOD, TSS, nutrients (NH_3-N, NO_3-N, T-P, PO_4 and TN), and O/G analysis were performed on POTW influent and effluent, and industrial samples. All results are entered into the POTW's database. The data is reviewed and trended throughout the year.

Influent chromium saw an increase during the latter half of 2007. Influent chromium was 170 ppb during January 2008 but then dropped and stayed below 5 ppb from March onward. Effluent chromium averaged 1.2 ppb during 2008 (n=7). During the last half of 2008, effluent chromium averaged 0.3 ppb (n=3).

Over the last two years mercury concentrations have averaged 0.160 ppb for influent (n=8) and 0.0044 ppb for effluent (n=8). The removal efficiency is approximately 97%. The effluent average is well below the calculated water quality limit of 0.0200 ppb. The latest sludge results reported 900 ppb for TCLP mercury, and < 1.19 mg/kg dry for total mercury. The high detection limit for sludge total mercury makes it impossible to perform mass balance calculations. With respect to sludge land application, the mercury monthly average concentration limit is 17 mg/kg dry and the ceiling

concentration limit is 57 mg/kg dry (40 CFR 503.13). Soil testing conducted in 2007 resulted in total mercury values of < 0.330 mg/kg dry.

Influent silver averaged < 1.09 ppb in 2008, slightly down from < 1.14 ppb in 2007. Effluent silver averaged < 0.16 ppb in 2008, a significant drop from the 2007 average of < 0.90 ppb, due to the lowering of detection limits.

G. City Wide 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

Variation in water usage related to an increase in irrigation in dry years and a decrease in irrigation in wet years. The commercial sector has seen the biggest increase over the last four years.

H. Oil and Grease Abatement

The Environmental Compliance Specialist reviews all new construction and renovation plans for food service businesses to ensure that the facilities are plumbed properly, approves grease interceptor sizing for those businesses, inspects grease interceptor installations and conducts on-site inspections to ensure compliance with grease abatement regulations and to address problem areas. Grease interceptors are sized according to the food served, number of patrons, hours of operation and number of grease-generating appliances and appurtenances.

In 2008, there were 176 food service businesses inspected (these included inspections of new businesses and re-inspections of existing businesses). There were twenty-two plan reviews that required grease interceptor sizing and approval, with six pending. There were eight investigations conducted on food service businesses due to grease problems within the City's sanitary sewer system.

Other businesses that contribute oils and greases into the sanitary sewer system, such as car washes and auto maintenance shops are also of concern. There were five plan reviews that required oil/water interceptor sizing and approval, with one pending.

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.

I. Surcharge Summary

Surcharge fees are assessed for TSS and CBOD concentration above 300 mg/L for each day of noncompliance. In 2008 a total of $3602.92 was collected from industries exceeding the surcharge limits.

Industry	Surcharge Type	Month	Penalties
TOR	TSS	January 08	$569.88
MLD	TSS	February 08	$37.42
OMP	CBOD	March 08	$176.68
GMC	TSS and CBOD	March 08	$362.63
TOR	CBOD	April 08	$721.14
MLD	TSS	April 08	$3.11
TOR	TSS	May 08	$1,706.81
TOR	TSS	October 08	$25.25
TOR	TSS	December 08	pending

J. Pretreatment Audit

The last pretreatment program audit was conducted by Arkansas Department of Environmental Quality on May 13-15, 2008, by Allen Gilliam, State Pretreatment Coordinator. Minor administrative deficiencies were found but these issues have been resolved. The Rogers Pretreatment Program is currently compliant with all pretreatment requirements.

K. 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.

L. Pretreatment Program Conclusion

The basic aspects of implementing Rogers' pretreatment program have been addressed and that flexible innovative program management initiatives are achieving environmental results beyond what would be "reported" through calculated limits alone. The Rogers pretreatment program is reporting a reduction in pollutant loading at the POTW for various pollutants and is experiencing the results of cooperative and voluntary best management practices, water conservation, waste minimization, slug control and pollution prevention implementation efforts.

The POTW's expansion should be complete after March 2009. Once the treatment facility has reached a steady state, reassessment of technically based local limits (TBLLs) will started. Twelve months of monitoring will be initiated so that maximum allowable headworks loadings (MAHLs) and allowable industrial loadings (AILs) can be recalculated. This monitoring will also include at least three domestic sites for assessing background loading.

VIII. Industrial Pretreatment Contacts

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PPS Program Report

* NPDES ID: AR0043397 Permittee's Name Rogers

* Report Received/Event Date: 2/2/09 Date 3/30/09

Report Type

Please select a Program Report to add

- ( ) Biosolids Program Report
- ( ) CAFO Annual Report
- ( ) CSO Event Report
- ( ) Local Limits Report
- ( ) MS4 Program Report
- (X) Pretreatment Performance Summary Report
- ( ) SSO Annual Report
- ( ) SSO Event Report
- ( ) SSO Monthly Event Report
- ( ) Storm Water Event Report

CONTI

Report Information

* Pretreatment Performance Summary Start Date: 1/1/08

Significant Industrial Users (SIUs)

SIUs:	12
SIUs Without Control Mechanism:	0
SIUs Not Inspected:	0
SIUs Not Sampled:	0
SIUs in SNC with Pretreatment Standards:	0
SIUs in SNC with Reporting Requirements:	0
SIUs in SNC with Pretreatment Schedule:	0
SIUs in SNC Published in Newspaper:	0
SIUs Schedules:	0
Violation Notices Issued to SIUs:	4
Administrative Orders Issued to SIUs:	0
Civil Suits Filed Against SIUs:	0
Criminal Suits Filed Against SIUs:	0

Categorical Industrial Users (CIUs)

CIUs:	5
CIUs in SNC:	0

Penalties

Dollar Amount of Penalties Collected: $	0
strial Users (IUs) from which Penalties have been collected:	0

Other Information

SUO Reference:	
SUO Date:	
Annual Pretreatment Budget: $	
Pass-Through/Interference Indicator:	
ition of IU Schedule for Remedial Measures:	No
nal Response to Violation of IU Schedule for Remedial Measures:	

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits:	
Date of Most Recent Adoption of Technically Based Local Limits:	
Local Limit Pollutants:	

ADD / REMOVE

Removal Credits

Removal Credits Application Status:	Not Applicable
Date of Most Recent Removal Credits Approval:	
Removal Credits:	

ADD / REMOVE

Acceptance of Waste

Acceptance of Hazardous Waste:	No
Acceptance of Non-Hazardous Industrial Waste:	No
Acceptance of Hauled Domestic Wastes:	No

Deficiencies

Deficiencies Identified During IU File Review:	No
Control Mechanism Deficiencies:	No
Legal Authority Deficiencies:	No
Deficiencies in Data Management and Public Participation:	No
Deficiencies in Interpretation and Application of Pretreatment Standards:	No
Inadequacy of Sampling and Inspections:	No
Adequacy of Pretreatment Resources:	Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:	
Annual Frequency of Effluent Toxicant Sampling:	
Annual Frequency of Sludge Toxicant Sampling:	