

Allen

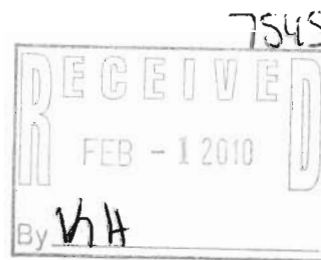
# ANNUAL PRETREATMENT PROGRAM STATUS REPORT

for the

## CITY OF ROGERS, ARKANSAS

January 2009 - December 2009

Permit No. AR0043397



complete/compliant  
no action necessary  
HF



Submitted to  
Arkansas Department of Environmental Quality (ADEQ)

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## II. A. MONITORING RESULTS TABLE III POLLUTANTS PART 1 REPORTING YEAR: JANUARY 2009 TO DECEMBER 2009

TREATMENT PLANT: City of Rogers  
AVERAGE POTW FLOW: 7.057 MGD

% STORM WATER INFILTRATION: 16.0

NPDES PERMIT NO. AR0043397  
% IU FLOW: 15.6

| METALS,<br>CYANIDE<br>& PHENOLS<br>(Total) | Units | Maximum Allowable Headworks Level<br>µg/L | Influent Concentrations in µg/L<br>2009 Dates Sampled |          | Calc. WLaC Level/Limit<br>µg/L | Effluent Concentrations in µg/L<br>2009 Dates Sampled |          | Laboratory Analysis<br>2009 |                         |                 |
|--|-------|---|---|----------|--------------------------------|---|----------|-----------------------------|-------------------------|-----------------|
|  |       |   | 03/17-18  | 05/19-18 |                                | 03/19-20  | 05/20-21 | EPA Method                  | Detection Limit<br>µg/L | EPA MQL<br>µg/L |
| Antimony                                   | µg/L  | na  | 0.70  | 0.20     | na                             | 0.35  | 0.24     | 200.8                       | 0.03                    | 60              |
| Arsenic                                    | µg/L  | 25.0                                      | 1.30  | < 0.35   | 504                            | 1.12  | 0.18     | 200.8                       | 0.07                    | 0.5             |
| Beryllium                                  | µg/L  | na  | < 0.15  | < 0.15   | na                             | < 0.03  | < 0.06   | 200.8                       | 0.03                    | 0.5             |
| Cadmium                                    | µg/L  | 19.0                                      | 0.40  | 0.20     | 10.30                          | < 0.02  | < 0.04   | 200.8                       | 0.02                    | 0.5             |
| Chromium                                   | µg/L  | 528                                       | 3.40  | 1.55     | 1847                           | 0.62  | 0.28     | 200.8                       | 0.05                    | 10.0            |
| Copper                                     | µg/L  | 678                                       | 38.6  | 25.2     | 60.5                           | 1.40  | 0.74     | 200.8                       | 0.03                    | 0.5             |
| Lead                                       | µg/L  | 71.0                                      | 2.20  | 1.75     | 27.6                           | 0.21  | 0.14     | 200.8                       | 0.01                    | 0.5             |
| Mercury                                    | µg/L  | 0.050                                     | 0.1350  | 0.2235   | 0.020                          | 0.0022  | 0.0016   | 1631                        | 0.0002                  | 0.005           |
| Molybdenum                                 | µg/L  | 53.0                                      | 2.05  | 0.90     | na                             | 1.71  | 0.56     | 200.8                       | 0.05                    | NA              |
| Nickel                                     | µg/L  | 19.0                                      | 5.30  | 2.80     | 621                            | 1.29  | 0.82     | 200.8                       | 0.05                    | 0.5             |
| Selenium                                   | µg/L  | 16.0                                      | < 1.0   | < 1.0    | 8.28                           | < 0.20  | < 0.40   | 200.8                       | 0.2                     | 5               |
| Silver                                     | µg/L  | 100                                       | 0.70  | 0.60     | 25.0                           | < 0.08  | < 0.16   | 200.8                       | 0.08                    | 0.5             |
| Thallium                                   | µg/L  | na  | < 0.25  | < 0.25   | na                             | < 0.05  | < 0.10   | 200.8                       | 0.05                    | 0.5             |
| Zinc                                       | µg/L  | 500                                       | 123   | 121      | 460                            | 32.2  | 28.6     | 200.8                       | 0.5                     | 20              |
| Cyanide                                    | µg/L  | 27.0                                      | 15  | < 10     | 8.5                            | < 10  | < 10     | 4500-CNf                    | 10                      | 10              |
| Phenols                                    | µg/L  | na  | 154   | 70       | na                             | < 5   | < 6      | 420.1                       | 3                       | 5               |

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

|            | Loading in kg/day |          | Loading in kg/day |          | EFF   |
|------------|-------------------|----------|-------------------|----------|-------|
|            | 03/17-18          | 05/19-18 | 03/19-20          | 05/20-21 |       |
| Antimony   | 0.014             | 0.006    | 0.007             | 0.008    | 8.456 |
| Arsenic    | 0.027             | < 0.011  | 0.023             | 0.006    | 5.440 |
| Beryllium  | < 0.003           | < 0.005  | < 0.001           | < 0.002  |       |
| Cadmium    | 0.008             | 0.006    | < 0.000           | < 0.001  |       |
| Chromium   | 0.070             | 0.050    | 0.013             | 0.009    |       |
| Copper     | 0.795             | 0.807    | 0.029             | 0.024    |       |
| Lead       | 0.045             | 0.056    | 0.004             | 0.004    |       |
| Mercury    | 0.00278           | 0.00715  | 0.00005           |          |       |
| Molybdenum | 0.042             | 0.029    | 0.035             | 0.018    |       |
| Nickel     | 0.109             | 0.090    | 0.027             | 0.026    |       |
| Selenium   | 0.021             | < 0.032  | 0.004             | < 0.013  |       |
| Silver     | 0.014             | 0.019    | 0.668             | < 0.005  |       |
| Thallium   | < 0.005           | < 0.008  | < 0.001           | < 0.003  |       |
| Zinc       | 2.533             | 3.873    | 12.29             | 0.915    |       |
| Cyanide    | 0.309             | <        | 0.227             | < 0.206  |       |
| Phenols    | 3.171             | <        | < 0.103           | <        |       |
| Flow       | MGD               | 8.456    | 5.440             | 8.456    | 8.456 |

Samples are collected considering flow detention time through the plant. Analytical MQLs are used. MAHL and WQL calculated during development of 2004 TBL 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 monitoring 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 7.057 MGD.

**II. A. MONITORING RESULTS TABLE III POLLUTANTS PART 2  
REPORTING YEAR: JANUARY 2009 TO DECEMBER 2009**

TREATMENT PLANT: City of Rogers  
AVERAGE POTW FLOW: 7.057 MGD

% STORM WATER INFILTRATION: 16.0  
% IU FLOW: 15.6

NPDES PERMIT NO. AR0043397  
% IU FLOW: 15.6

| METALS, CYANIDE & PHENOLS (Total) | Units  | Maximum Allowable Headworks Level µg/L | Influent Concentrations in µg/L<br>2009 Dates Sampled |          | Calculated WQ Level/ Limit µg/L | Effluent Concentrations in µg/L<br>2009 Dates Sampled |          | Laboratory Analysis 2009 |          |            |
|-----------------------------------|--------|--|---|----------|---------------------------------|---|----------|--------------------------|----------|------------|
|                                   |        |  | 07/13-14  | 09/14-15 |                                 | 11/02-03  | 07/14-15 | 09/15-16                 | 11/03-04 | EPA Method |
| Antimony                          | µg/L   | na                                     | 0.40  | 0.45     | 0.25                            | 0.34  | 0.34     | 200.8                    | 0.03     | 60         |
| Arsenic                           | µg/L   | 25.0                                   | 0.50  | 0.75     | 0.55                            | 0.24  | 0.32     | 200.8                    | 0.07     | 0.5        |
| Beryllium                         | µg/L   | na                                     | < 0.15  | < 0.15   | 0.15                            | < 0.06  | < 0.06   | 200.8                    | 0.03     | 0.5        |
| Cadmium                           | µg/L   | 19.0                                   | 0.20  | 0.20     | 0.10                            | < 0.04  | < 0.04   | 200.8                    | 0.02     | 0.5        |
| Chromium                          | µg/L   | 528                                    | 2.00  | 7.20     | 3.40                            | 0.32  | 0.42     | 200.8                    | 0.05     | 10.0       |
| Copper                            | µg/L   | 678                                    | 32.8  | 31.2     | 24.40                           | 60.5  | 1.02     | 200.8                    | 0.03     | 0.5        |
| Lead                              | µg/L   | 71.0                                   | 1.80  | 1.75     | 1.20                            | 27.6  | 0.20     | 200.8                    | 0.01     | 0.5        |
| Mercury                           | µg/L   | 0.050                                  | 0.1185  | 0.2870   | 0.1085                          | 0.020   | 0.0018   | 1631                     | 0.0002   | 0.005      |
| Molybdenum                        | µg/L   | 53.0                                   | 1.65  | 1.55     | 1.20                            | na  | 0.84     | 200.8                    | 0.05     | NA         |
| Nickel                            | µg/L   | 19.0                                   | 3.55  | 5.40     | 2.85                            | 621   | 1.56     | 200.8                    | 0.05     | 0.5        |
| Selenium                          | µg/L   | 16.0                                   | < 1.00  | 1.60     | 1.65                            | 8.28  | < 0.40   | 200.8                    | 0.05     | 0.5        |
| Silver                            | µg/L   | 100                                    | 0.40  | 0.60     | < 0.40                          | 25.0  | < 0.16   | 200.8                    | 0.08     | 0.5        |
| Thallium                          | µg/L   | na                                     | < 0.25  | < 0.25   | < 0.25                          | na  | < 0.10   | 200.8                    | 0.05     | 0.5        |
| Zinc                              | µg/L   | 500                                    | 167   | 120      | 78.8                            | 460   | 42.4     | 200.8                    | 0.5      | 20         |
| Cyanide                           | µg/L   | 27.0                                   | < 10  | < 10     | < 10                            | 8.5   | < 10     | 4500-CN f                | 10       | 10         |
| Phenols                           | µg/L   | na                                     | 42  | 12       | 12                              | na  | < 8      | 420.1                    | 3        | 5          |
| Loading in kg/day                 |        |  |   |          |                                 |   |          |                          |          |            |
| Antimony                          | kg/day | na                                     | 0.009   | 0.013    | 0.007                           | na  | 0.007    | 0.010                    | 0.008    |            |
| Arsenic                           | kg/day | 0.67                                   | 0.011   | 0.022    | 0.014                           | 13.46   | 0.005    | 0.009                    | 0.006    |            |
| Beryllium                         | kg/day | na                                     | < 0.003   | < 0.004  | < 0.004                         | na  | < 0.001  | < 0.002                  | < 0.002  |            |
| Cadmium                           | kg/day | 0.51                                   | 0.004   | 0.006    | 0.003                           | 0.275   | < 0.001  | < 0.001                  | < 0.001  |            |
| Chromium                          | kg/day | 14.1                                   | 0.043   | 0.211    | 0.089                           | 49.34   | 0.007    | 0.012                    | 0.010    |            |
| Copper                            | kg/day | 18.1                                   | 0.702   | 0.912    | 0.641                           | 1.616   | 0.025    | 0.030                    | 0.027    |            |
| Lead                              | kg/day | 1.90                                   | 0.039   | 0.051    | 0.032                           | 0.737   | 0.004    | 0.005                    | 0.005    |            |
| Mercury                           | kg/day | 0.0013                                 | 0.00254   | 0.00285  | 0.00285                         | 0.00053   | 0.00004  | 0.00006                  | 0.00006  |            |
| Molybdenum                        | kg/day | 1.42                                   | 0.035   | 0.045    | 0.032                           | na  | 0.018    | 0.025                    | 0.024    |            |
| Nickel                            | kg/day | 0.51                                   | 0.076   | 0.158    | 0.075                           | 16.59   | 0.033    | 0.037                    | 0.038    |            |
| Selenium                          | kg/day | 0.43                                   | < 0.021   | 0.047    | 0.043                           | 0.221   | < 0.009  | 0.017                    | < 0.019  |            |
| Silver                            | kg/day | 2.67                                   | 0.009   | 0.018    | < 0.011                         | 0.668   | < 0.003  | < 0.005                  | < 0.004  |            |
| Thallium                          | kg/day | na                                     | < 0.005   | < 0.007  | < 0.007                         | na  | < 0.002  | < 0.003                  | < 0.003  |            |
| Zinc                              | kg/day | 13.4                                   | 3.575   | 3.510    | 2.070                           | 12.29   | 0.908    | 0.956                    | 0.830    |            |
| Cyanide                           | kg/day | 0.72                                   | < 0.214   | < 0.263  | < 0.263                         | 0.227   | < 0.214  | < 0.263                  | < 0.263  |            |
| Phenols                           | kg/day | na                                     | 0.90  | 0.315    | 0.315                           | na  | 0.171    | < 0.158                  | < 0.158  |            |
| Loading in kg/day                 |        |  |   |          |                                 |   |          |                          |          |            |
| Flow                              | MGD    | INF                                    | 5.655   | 7.726    | 6.939                           | EFF   | 5.655    | 7.726                    | 6.939    |            |

MDL's for Influent may be higher if sample was diluted 5X and for Effluent if sample was diluted 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 TBL 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 monitoring 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 7.057 MGD.

III. Attachment A  
2009 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

| INDUSTRIAL USER     | SIC CODE | CATEGORICAL DETERMINATION                      | CONTROL DOC |             | NEW USER | TIMES INSPECTED | TIMES SAMPLED | BMR | COMPLIANCE STATUS REPORTS |             |                 |   | PERMIT EFFLUENT |
|---------------------|----------|--|-------------|-------------|----------|-----------------|---------------|-----|---------------------------|-------------|-----------------|---|-----------------|
|                     |          |  | Y/N         | LAST ACTION |          |                 |               |     | 90-DAY COMPLIANCE         | SEMI ANNUAL | SELF MONITORING |   |                 |
| Bekaert Steel       | 2296     | Metal Finishing 433.17 & Iron and Steel 420.96 | Y           | 11/01/07    | N        | 1               | 16            | N/A | N/A                       | C           | C               | C | C               |
| Glad Manufacturing  | 2673     | Non-categorical                                | Y           | 03/01/07    | N        | 1               | 14            | N/A | N/A                       | C           | C               | C | C               |
| Kennametal          | 3545     | Non-Ferrous Metals 471.54                      | Y           | 10/01/08    | N        | 1               | 16            | N/A | N/A                       | C           | C               | C | C               |
| MAFCO               | 3443     | Metal Finishing 433.17                         | Y           | 03/01/07    | N        | 1               | 15            | N/A | N/A                       | C           | C               | C | C               |
| Model Laundry       | 7211     | Non-categorical                                | Y           | 03/01/07    | N        | 1               | 15            | N/A | N/A                       | C           | C               | C | C               |
| Ozark Mt. Poultry   | 2015     | Non-cat Meat&Poultry 432.126*                  | Y           | 03/01/07    | N        | 1               | 15            | N/A | N/A                       | C           | C               | C | NC              |
| Pel-Freez Arkansas  | 2015     | Non-cat Meat&Poultry 432.54*                   | Y           | 03/01/07    | N        | 2               | 13            | N/A | N/A                       | C           | C               | C | C               |
| Preformed Line      | 3644     | Aluminum Forming 467.55                        | Y           | 03/01/07    | N        | 1               | 19            | N/A | N/A                       | C           | C               | C | NC              |
| Strateline Ind.     | 2297     | Non-cat. Textile Mills 410.86*                 | Y           | 11/30/07    | N        | 1               | 26            | N/A | C                         | C           | C               | C | C               |
| Superior Ind. Int.  | 3363     | Metal Finishing 433.17                         | Y           | 03/01/07    | N        | 1               | 16            | N/A | N/A                       | C           | C               | C | C               |
| Tyson Chick-N-Quick | 2015     | Non-cat Meat&Poultry 432.124*                  | Y           | 03/01/07    | N        | 1               | 52            | N/A | N/A                       | C           | C               | C | C               |
| Tyson of Rogers     | 2015     | Non-cat Meat&Poultry 432.124*                  | Y           | 03/01/07    | N        | 2               | 69            | N/A | N/A                       | C           | C               | C | C               |
|                     |          |  |             |             |          |                 |               |     |                           |             |                 |   |                 |
|                     |          |  |             |             |          |                 |               |     |                           |             |                 |   |                 |
|                     |          |  |             |             |          |                 |               |     |                           |             |                 |   |                 |
|                     |          |  |             |             |          |                 |               |     |                           |             |                 |   |                 |

\* only required to comply with 40 CFR 403



## V. Attachment C

### 2009 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                         | <u>City of Rogers</u>                            |             |                            |
| Address  | <u>4300 Rainbow Road</u>                         |             |                            |
| City   | <u>Rogers</u>                                    | State / Zip | <u>Arkansas 72758-1440</u> |
| Contact Person                                 | <u>Paul N. Burns, Pretreatment Coordinator</u>   |             |                            |
| Contact Telephone                              | <u>(479) 273-7378 x109</u>                       |             |                            |
| NPDES Permit No.                               | <u>AR0043397</u>                                 |             |                            |
| Reporting Period                               | <u>January 1, 2009 through December 31, 2009</u> |             |                            |
| Total Number of Categorical IUs                | <u>5</u>   |             |                            |
| Total Number of Significant Noncategorical IUs | <u>7</u>   |             |                            |

#### B. Significant Industrial User Compliance

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

C. Compliance Monitoring Program

|  | Significant Industrial Users |                 |
|--|------------------------------|-----------------|
|  | Categorical                  | Non-Categorical |
| 1) No. of Control Documents Issued/ Total No. Required | <u>5 / 5</u>                 | <u>7 / 7</u>    |
| 2) No. of Non-sampling Inspections Conducted           | <u>5</u>                     | <u>9</u>        |
| 3) No. of Sampling Visits Conducted                    | <u>13</u>                    | <u>13</u>       |
| 4) No. of Facilities Inspected (non-sampling)          | <u>5</u>                     | <u>7</u>        |
| 5) No. of Facilities Sampled                           | <u>5</u>                     | <u>7</u>        |

D. Enforcement Actions

|   | Significant Industrial Users |                 |
|---|------------------------------|-----------------|
|   | Categorical                  | Non-Categorical |
| 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>3</u>                     | <u>4</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 M Burns  
Authorized Representative

01/25/10  
Date



## VI. Significant Violator Newspaper Publication

There were no industrial users listed in the newspaper as significantly noncompliant of permit requirements for the 2009 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 | Monitored Process Flow* (gpd) | % of Total IU Process Flow | Permit ID |
|-------------------------|-----------|-----------------|-------------------------------|----------------------------|-----------|
| Bekaert Steel           | 314992    | 433.17 & 420.96 | 19,000                        | 1.6%                       | 07-B-BSC  |
| Kennametal              | 333515    | 471.54          | 8,000                         | 0.7%                       | 08-KMT    |
| MAFCO                   | 332919    | 433.17          | 1,650                         | 0.1%                       | 07-MFC    |
| Preformed Line Products | 335932    | 467.55          | 5,000                         | 0.4%                       | 07-PLP    |
| Superior Industries     | 331521    | 433.17          | 46,000                        | 4.0%                       | 07-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    |                 | 32,000                         | 2.8%                       | 07-GMC    |
| Model Laundry          | 812320    |                 | 7,500                          | 0.6%                       | 07-MLD    |
| Ozark Mountain Poultry | 311615    | 432.126*        | 88,000                         | 7.6%                       | 07-OMP    |
| Pel-Freez Arkansas     | 311615    | 432.54*         | 27,000                         | 2.3%                       | 07-PFM    |
| Strateline Industries  | 331521    | 410.86*         | 126,500                        | 10.9%                      | 07-SLI    |
| Tyson Chick 'N Quick   | 311615    | 432.124*        | 430,000                        | 37.1%                      | 07-TCQ    |
| Tyson of Rogers        | 311615    | 432.124*        | 360,000                        | 31.1%                      | 07-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    |                 | 7,700              | 0.7                        | 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. 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. Two Industrial User surveys were sent out in 2009 to Juiced Creative/Stribling and Harris Bakery which are existing non-permitted IUs.

## 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. Kennametal was reissued a permit in October 2008 that corrected the production based limits. The ten Permits issued in 2007 expired December 31<sup>st</sup>, 2009. Industrial User Permit Renewal Applications (revised, see Attachment 1) were sent out in July 2009 to all the IUs except for Cryovac, Kennametal, and Strateline. IU Fact Sheets were revised after the renewal applications were returned and then new Permits were written. The new Permits became effective January 1<sup>st</sup> 2010.

## C. Industrial Monitoring and Inspection Activities

Each significant industrial user was monitored twice during the past pretreatment year by the Control Authority except for Pel-Freez and Strateline which were monitored once. Industries required to monitor for cyanide are only Control Monitored 1/year for that parameter. 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 2009. Both Pel-Freez and Tyson of Rogers were inspected a second time in December as part of an audit conducted by Alison West from the ADEQ Fayetteville field office.

## 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 ten industrial users were compliant with permit and reporting requirements: Bekaert Steel, Glad Manufacturing, Kennametal, MAFCO, Model Laundry, Pel-Freez Arkansas, Strateline Industries, Superior Industries, Tyson Chick-N-Quick, and Tyson of Rogers.

Noncompliant (NC): The following two industrial users were noncompliant with permit requirements: Ozark Mountain Poultry and Preformed Line.

- 1) Ozark Mountain Poultry had four violations in January for exceeding the monthly concentration and loading limits, and monthly concentration and loading TRCs for CBOD. OMP was issued an NOV for the four violations. The result of the self monitoring sample collected at the OMP facility on 01/26-27/09 was 574 mg/L with a loading of 419 lbs/day. The high amount of CBOD was due to power failures during a winter ice storm. OMP was in compliance with all permit requirements throughout the rest of 2009.

2) Preformed Line Products (PLP) was in violation in January, July, and November. 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 three violations. After the January violation PLP was strongly advised to make improvements to the pretreatment system that included oil skimming/removal technology. PLP responded that new equipment was to be purchased and installed in response to the first violation. The new equipment was not installed prior to the November violation. After the November violation, PLP was required to provide a response letter that included a description of the oil/grease technology that will be purchased, and a time table for when the equipment will be purchased and then installed. PLP submitted a letter stating the new equipment would be installed in January 2010.

Significant Noncompliant (SNC): There were no industrial users in significant noncompliance of permit requirements for the 2009 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 and early 2009 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 was completed in March 2009.

The POTW's average annual flow rate increased from 7.067 MGD in 2007 to 9.080 MGD in 2008 but then decreased in 2009 to 7.057 MGD. According to NOAA records, 2009 received more rainfall than 2007 but improvements to sections of the sewer system decreased stormwater infiltration. Metals monitoring includes all pollutants listed in 40 CFR 122 Appendix D, Table III. All Table III pollutants were monitored for five times during 2009, except phenols and cyanide, which were monitored for once per quarter. Refer to section II. A. & B. for the tabulated results. 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 May. The priority pollutant scan includes all parameters listed in 40 CFR 122 Appendix D, Table II. However, the contract laboratory failed to meet holding time requirements for the VOC samples. VOC was monitored again in November. 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 0.010 mg/L except for bromomethane which was 0.0113 mg/L in the effluent but not detected in the influent. Bromomethane has a boiling point of 3.6°C and it readily volatilizes, and it is unclear why it was present in the effluent sample but not the influent sample. In 2008 it was detected in the effluent at a level of 0.00012 mg/L. The contract laboratory was able to analyze both effluent and influent for VOCs without dilution, which resulted in very low detection limits.

Biosolids samples were monitored for total metals, cyanide and phenolics, as required by permit during 2009. The sludge was dewatered with a centrifuge and then hauled off site to a permitted

landfill until the end of the year. This changed in December and now the sludge is hauled to a land application site in Kansas.

CBOD, TSS, nutrients (NH<sub>3</sub>-N, NO<sub>3</sub>-N, TN-N, TP-P, and PO<sub>4</sub>-P), and O/G analyses 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.

#### 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        |
| 2009 | 1315.206    | 580.440    | 521.372    | 141.136 | 2558.154 | 20.38        |

Variation in water usage was related to an increase in irrigation in dry years and a decrease in irrigation in wet years. The economic recession of 2008 and 2009 influenced the decrease in water usage for all categories.

#### G. Oil and Grease Abatement

New construction and renovation plans for food service businesses are reviewed on a continual basis to ensure that the facilities are plumbed properly. Food service businesses are evaluated to determine grease interceptor sizing. Grease interceptor installations are inspected. On-site inspections are conducted 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. Over 125 restaurants with grease interceptors were inspected in 2009.

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 business 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.

#### H. Surcharge Summary

Surcharge fees are assessed for TSS and CBOD concentration above 300 mg/L for each day of exceedance.

| Industry | Surcharge Type | Month       | Penalties |
|----------|----------------|-------------|-----------|
| TOR      | CBOD           | December 08 | \$15.31   |
| OMP      | CBOD           | January 09  | \$911.93  |
| KMT      | TSS            | May 09      | \$78.57   |
| MLD      | CBOD           | May 09      | \$23.46   |
| OMP      | TSS            | July 09     | \$80.37   |

#### I. Pretreatment Audit

The last major pretreatment program audit was conducted by Arkansas Department of Environmental Quality on May 13-15, 2008, by Allen Gilliam, State Pretreatment Coordinator. Alison West of the ADEQ Fayetteville Field Office audited the IPT Program in December of this year. The Rogers Pretreatment Program is currently compliant with all pretreatment requirements.

#### J. Pollution Prevention (P<sup>2</sup>) 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.

#### K. Pretreatment Program Conclusion

The basic aspects of implementing Rogers' pretreatment program have been addressed. Flexible and innovative program management initiatives are achieving environmental results beyond what would be "reported" through calculated limits alone. A combination of reduced water usage in the commercial sector, reduced industrial output, and industrial user pretreatment improvements has influenced a reduction in pollutant loading at the POTW for various pollutants. Some of these reductions may be attributed to cooperative and voluntary best management practices, water conservation, waste minimization, slug control and pollution prevention implementation efforts.

The POTW's expansion was completed in March 2009. The treatment facility reached a "steady state" immediately after the expansion completion. Reassessment of technically based local limits (TBLs) has begun. Five monitoring events for metals, including Hg, have been conducted since then. A comparison between pre- and post- expansion data is being conducted. At least five more monitoring events will be conducted prior to the end of the third quarter for the 2010 calendar year. Maximum allowable headworks loadings (MAHLs) and allowable industrial loadings (AILs) will be recalculated in October 2010. This monitoring will also include at least three domestic sites for assessing background loading.

## VIII. Industrial Pretreatment Contacts

### **Bekaert Corp.**

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1 Bekaert Dr. Rogers, AR 72756-1948  
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rodney.bland@bekaert.com

### **Cryovac, Inc. (MOA)**

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4 Bekaert Dr. Rogers, AR 72756  
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### **Glad Manufacturing**

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1700 N. 13th St. Rogers, AR 72756-2308  
479-246-6331 fax 659-6420  
cell 366-1862  
mike.watkins@clorox.com

### **Kennametal**

Tim Bair - Facilities Engineer  
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P.O. Box 9 Rogers, AR 72757-0009  
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direct dial 621-4726  
cell 531-4611  
tim.bair@kennametal.com

### **MAFCO, Inc.**

John Wood - Manufacturing Engineer  
1203 N. 6th St.  
P.O. Box 1058 Rogers, AR 72757-1058  
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### **Model Laundry & Dry Cleaners**

Steve Ash - President  
221 W. Elm St. Rogers, AR 72756-4533  
479-636-2525 cell 981-1815  
steve@modellandry.com  
alt Art Stout cell 479-936-1726

### **Ozark Mountain Poultry**

Tommy Lewis - Maintenance Manager  
750 West Easy St.  
P.O. Box 2440 Rogers, AR 72757-2440  
479-633-8600 x4264 fax 633-8801  
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tlewis@ompfoods.com  
alt Bill Macleod cell 479-644-6578

### **Pel-Freez Arkansas LLC**

Brenda Crenshaw - QA Mgr./Env. Coordinator  
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### **Preformed Line Products Co.**

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2740 S. 1st St.  
P.O. Box 808 Rogers, AR 72757-0808  
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srenfro@preformed.com

### **Strateline Industries**

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400 W. New Hope Rd. Rogers, AR 72758-5935  
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### **Superior Industries - Arkansas LLC**

Les Baker – Human Resources  
1301 N. Dixieland Rd. Rogers, AR 72756-2162  
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alt Bob Laird x 432

### **Tyson Chick-N-Quick**

John Thomas – Environmental Manager  
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cell 479- 685-0676  
john.a.thomas@tyson.com

### **Tyson of Rogers**

Wylie Luther – Wastewater / Env. Manager  
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479-636-1620 (gen line) fax 636-7677  
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alt Carla Bray

Updated 12/29/2009

# PPS Program Report

\* NPDES ID: AR0043397 Permittee's Name Rogers  
 \* Report Received/Event Date: 2/1/10 Date 2/8/10

## Report Type

Select a Program Report to add

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

CONTINUE

## Report Information

\* Pretreatment Performance Summary Start Date: 11/1/09

## 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: 7  
 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  
 Industrial Users (IUs) from which Penalties have been collected: 0

## Other Information

SUO Reference: 04-150  
 SUO Date: 12/14/04  
 Annual Pretreatment Budget: \$ \_\_\_\_\_  
 Pass-Through/Interference Indicator: No  
 Violation of IU Schedule for Remedial Measures: No  
 Typical Response to Violation of IU Schedule for Remedial Measures: No

## Local Limits

Date of Most Recent Technical Evaluation & or Local Limits: 12/04  
 Date of Most Recent Adoption of Technically Based Local Limits: 12/14/04  
 Local Limit Pollutants: Arsenic, Cadmium, Chromium, Copper, Lead, mercury, Nickel, Molybdenum, Selenium, Silver, Zinc, Cyanide  
 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: \_\_\_\_\_