

ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

October 06, 2011

Mr. Allen R. Gilliam
Engineer II
Pretreatment Program Coordinator
Arkansas Department of Environmental Quality
5301 Northshore
North Little Rock, Arkansas 72118-5317

Re: City of Rogers (NPDES #AR0043397; AFIN # 04-00155) Pretreatment Program Audit / Pollution Prevention Assessment Response

Dear Mr. Gilliam,

This letter is in response to the Pretreatment Program Audit / Pollution Prevention Assessment report received September 9, 2011. Please review the audit response summary included with this letter that contains comments and corrective actions regarding the audit report's findings.

The three days that I spent with you going over the various aspects of our program were most informative. Your thoroughness and improvement efforts are a great benefit to the City of Rogers' pretreatment program.

Sincerely,

A handwritten signature in cursive script that reads "Paul N. Burns".

Paul N. Burns
Pretreatment Coordinator

cc: Tom McAlister, RWU General Manager
Robert Moore, RPCF Plant Manager
File

AUDIT RESPONSE SUMMARY

Here are the comments of the Control Authority and the corrective actions taken to address the findings of a Pretreatment Program Audit conducted by ADEQ on June 13th -15th, 2011.

ADEQ Required Actions

Item 1) - Description of Operations

To the best of my knowledge all City of Rogers permitted Industrial Users have submitted a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out. This information is available for each permitted Industry in the files examined during the audit. All the Industrial Users have submitted regulated process flow diagrams or blueprints that identify **major** processes, whether they flow to pretreatment or bypass pretreatment, where monitoring occurs, and where these flows connect to The City sanitary sewer.

In response to the last audit in 2008, this office made improvements to several Industrial User schematics and copies of the updates for Superior and Preformed Line were submitted. The emphasis from ADEQ during this audit was to have the Industrial Users make these modifications themselves.

There are certain minor deficiencies with respect to process flow diagrams submitted by Preformed Line Products, Mafco, Southeast Poultry, and Bekaert Steel.

Preformed Line Products' layout schematic failed to: include a legend (an earlier submittal included a legend), label key components of the pretreatment system, and show that the Galvanized Cleaning Tank is now routed to pretreatment.

Mafco's layout schematic should: be improved with a zoomed in diagram that identifies each stage of the five stage washer, and indicate that the three stage sheet washer is zero discharge.

Southeast Poultry needs to provide a larger schematic with labels for various process areas and arrows indicating wastewater flow. A separate schematic for pretreatment should be improved as well.

Bekaert Steel is a massive facility and it is very difficult to include all relevant details on even a single full sized blue print. Bekaert has provided updated diagrams of key areas of their facility over the years. However, multiple, not to scale, abstract process flow diagrams should be provided that indicate what flows to pretreatment and what flows directly to the sanitary sewer.

Item 2a) thru 2d) – Industrial User Inventory

After the audit a spread sheet was found on our server that was used to develop the hazardous waste notification mailing list. The current file location and name is F:\IPT\Industrial User Inventory Master List\INDUSTRIAL USER INVENTORY MASTER LIST 2011.xlsx. IUs will continue to be sorted into groups such as non significant industrial (mainly manufacturing), automotive, nursing and retirement, dental, and carwash. Permitted industries are no longer sent surveys but must fill out permit renewal applications.

It should be noted that a three page spread sheet print out was found in the files that documents the issuing and receiving of over 50 IW Surveys to IUs during the 1995 to 1996 period. Most of these IUs had already been surveyed during 1990.

ADEQ Recommended Actions For Improved Implementation

Item 1) - Chemical Handling Questions in IU inspection forms

Each permitted industry has a custom inspection form. Some of the inspection forms include questions about chemical handling while some do not. The inspection forms lacking these questions will be updated. However, all of the permitted industries have slug control plans that typically mention chemical safety training.

Item 2) – IUs in danger of nearing SNC criteria such as Southeast Poultry

This office makes all permitted industries aware of when they are nearing the SNC criteria. The Southeast Poultry example you cited is not a table of violations but a summary of all data for Southeast Poultry (SEP). Values that are bolded indicate that surcharge levels have been breached. SEP flow was less than 25,000 gpd during the first six months of operation and was not permitted until October 2010. A portion of the data summarized is pre permit and this is indicated in figure A-6. SEP receives violations for exceeding monthly average concentrations and has no daily max limitations. SEP was issued one violation for CBOD monthly average concentration during the December 2010 monitoring period. SEP was issued one violation for Oil/Grease monthly average concentration during the April 2011 monitoring period.

Item 3a) – Keep industry fact sheets up-to-date (and dated)

All of the industrial facts were updated prior to issuing permit renewals – most were updated prior to re-issuing multiple SIU permits that became effective January 2010. They are updated when a permit is to be modified or renewed. The annual inspection forms contain the most up to date information while some fact sheets may be two to three years old.

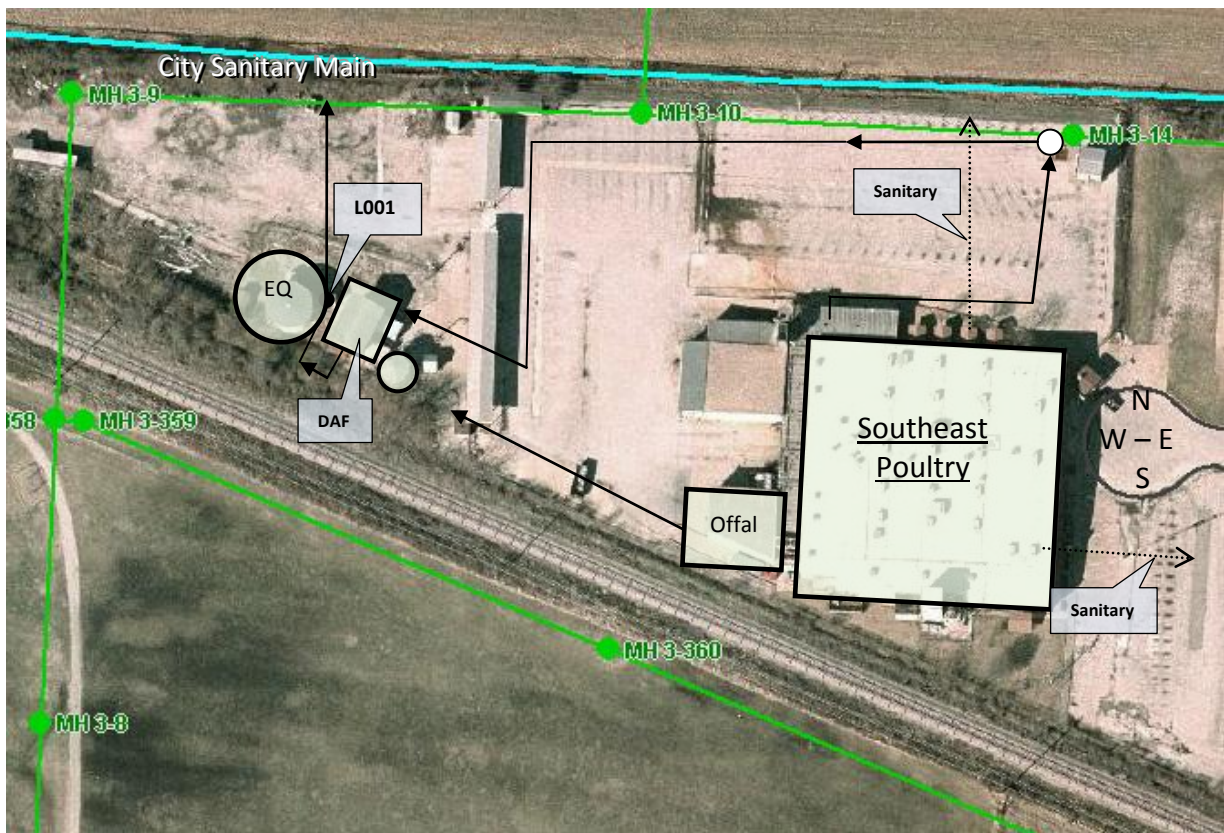
Item 3b) – Include all units used ... for Preformed Line

There is a misunderstanding that should be corrected with respect to this recommendation. The problem was that Preformed Line’s limits are loading limits but there were no units listed in the fact sheet. The limits were never converted to concentrations. “Limit in pounds” will be added to the factsheet and the permit will be revised as well.

Item 3c) – Improve the industry sampling point description verbally and graphically

This office will convert the simple maps used to illustrate the sampling points so that aerial photo layer is added to the graphic similar to what has already been done for Southeast Poultry. Photos “on the ground” will be added to each industry’s monitoring SOP.

Example:



Items 4) thru 9)

This office has reviewed and will take these final recommendations into consideration.

ADEQ Required Program Modifications

1) - Streamlining Revisions

This office will move forward with streamlining revisions and modify the City's Pretreatment Program Implementation Manual. A draft of the proposed changes will be submitted to ADEQ before finalizing them.

2) - Update Enforcement Response Plan

This office will make corrections to the Enforcement Response Guide options matrix so that informal notices, phone calls, and emails are listed as options for lesser offenses.