



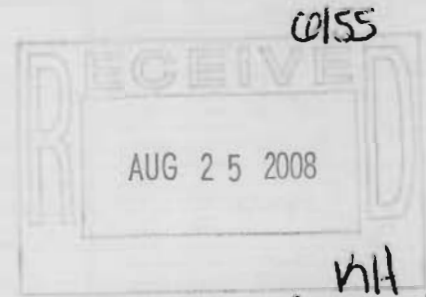
Rogers Water Utilities

ROGERS POLLUTION CONTROL FACILITY

"SERVING ROGERS - PROTECTING THE ENVIRONMENT"

August 20, 2008

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

no further actions req'd
Rogers 30 day Response to Audit Findings "requirement
'08

Dear Mr. Gilliam,

This letter is in response to the Pretreatment Program Audit / Pollution Prevention Assessment report received July 25, 2008. Please review the audit response summary included with this letter that contains comments and corrective actions regarding the audit report's findings.

The twenty-seven hours, over three days that I spent with you going over the various aspects of our program, were both informative and a great benefit to our pretreatment program.

Sincerely,

Paul N. Burns
Pretreatment Coordinator

cc: Tom McAlister, file

MAILED
SEP 1 2008

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 May 13 -15, 2008.

Required Actions

1. ADEQ Finding

012 Review Kennametal's permit limit calculations and make revisions. The current limits are multiplied by a dilution factor using the combined wastestream formula (CWF). The limits are production based and the CWF is not required. Also, "tripling" of regulated bath and rinse "credits" is allowable in their case.

City of Rogers Response

Although Kennametal does have a combined wastestream, the limits are mass based and the concentration based CWF formula was incorrectly used. However, this error did not increase but instead reduced Kennametal's limits by 47 percent. It could be argued that this error was unfavorable to Kennametal and put them under more restrictive limits than required by law.

With respect to an increase of allowable mass based on the number of baths or rinses, further investigation has shed light on this subject. Surface treatment rinse is the most critical category because it has the highest allowance multiplication factor. In fact almost 90 percent of the allowances come from the two rinse categories. Kennametal will be given credit for two surface treatment rinses for approximately 153,000 lbs of product per year, and then credit for one more surface treatment rinse for approximately 28,000 lbs of product per year. The previous calculation was incorrect because it assumed that all 181,000 lbs of product passed through each of the three baths. The mass values listed above are from the previous permit calculations.

Kennametal should be commended for the low amount of water used for rinses. Their daily process flow averages about 10,000 gallons. Based on their production numbers, the guidance manual for Part 471 Nonferrous Metals Forming and Metal Powders suggests that over 71,000 gpd would be typical for this much production.

Meetings have been held to verify production rate calculations. Once new values are obtained, the mass based limits will be recalculated, bypassing the CWF. The permit will be modified and reissued, hopefully by September 19th of this year.

2. ADEQ Finding

012 Superior Industries chain of custody was not complete.

City of Rogers Response

The sample collector only signed the chain of custody when he relinquished it and did not sign as the person starting and finishing the flow proportional composite sample. I met personally with Superior staff and went over the chain of custody requirements. This was also pointed out in a post inspection letter to Superior's General Manager.

3. ADEQ Finding

OK Under 40 CFR 403.12(b)(3), “Description of operations. The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes.”

The city must require their permitted IUs to submit updated, more detailed, accurate schematics and a fairly comprehensive description of their wastewater generating processes.

City of Rogers Response

“Brief” descriptions and diagrams indicating points of discharge have always been provided. However many diagrams don’t relay specific details for delineating wastestream types and volumes. Preformed Line has provided a new drawing that focuses on the area of their plant where wastewater is generated. For Superior Industries, I took an old diagram of the paint room from 2001 and re-rendered it with more details. This diagram was updated again after two more sight visits. For Kennametal I’ve also prepared a diagram of the tanks used for the coater cleaning line. I could ask the industries to do all of this themselves, but I would still have to validate the accuracy of the new diagram provided. In some instances, the industry representatives do not have a full understanding of certain aspects of their operations, and they may be working off of inadequate diagrams and notes. Please view the attached copies of the PLP and SII diagrams.

4. ADEQ Finding

OK Under 40 CFR 403.8(f)(2)(v), “[the City will] Randomly sample...and conduct surveillance activities in order to identify, **independent** of information supplied by Industrial Users, occasional and continuing noncompliance...”

It could not be ascertained if the City was verifying the production used to base the industries’ permit limits on.

City of Rogers Response

I believe that this section of 40 CFR is being quoted out of context and only portions of the full text were quoted.

The full text states: “Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User at least once a year, except as otherwise specified below...”

This section is strictly about independently collecting effluent samples from IUs in order to identify noncompliance with pretreatment limits. Guidelines and requirements for production based limits are found in 40 CFR 122.45. If my understanding is correct, limitations are to be based on a “reasonable measure of the actual production of the facility”. These “measures” come from records prepared by the company. There is no independent outside source for obtaining these numbers.

However, this office agrees that production numbers should be verified by questioning how each industry representative obtained the numbers. With Kennametal, for example, meetings were conducted with the individuals responsible for supplying the production values to Kennametal's pretreatment contact, Tim Bair. Each individual described how they gathered and calculated the values and provided examples of files and forms.

OK

5. ADEQ Finding

Under 40 CFR 403.8(f)(2)(i), "Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available ..."

Also under 40 CFR 403.8(f)(2)(ii), "Identify the character and volume of pollutants contributed to the POTW by the Industrial Users identified under paragraph (f)(2)(i) of this section. This information shall be made available..."

ADEQ assumed from the audit that the last documented IU survey was 2003. ADEQ wants surveys sent to any non-domestic user. ADEQ wants the City to evaluate if the smaller industrial users are candidates for pollution prevention (P2) or best management practices (BMPs).

City of Rogers Response

A comprehensive index of all Industrial Users within the City of Rogers was not found in the files. Some site visits were made, but not documented by the previous pretreatment coordinator. The dental surveys that were filled out in 2004 were shown to you during the audit, so I am not sure why the year 2003 is given as the last time a survey was documented. Since the audit I have found several surveys in the paper files that were completed over the past four years. These surveys were "buried" in the file cabinets and not mentioned in any master list. Please view the table below containing all the survey information and inquiries I could find.

Company	Contact Name	Date	Nature of Inquiry
City wide Dental Survey		2004	27 Dental Surveys Returned
Wal-mart Supercenter #5260	Minda Sarmiento	2004	Silver Recovery for Photo Lab
All Permitted IUs Surveyed		2005	Ind User Surveys
Safe Foods	Peggy Cook	July 2005	Ind User Survey
Harris Baking	Rob Hedges	Jan 2006	Ind User Survey
Smurfit-Stone	Bruce McGurl	Feb 2006	Ind User Survey
Biobased Fuels	Trevor Newbold	Mar 2006	Ind User Survey
Walgreens	Jennifer Campeotto	Aug 2006	Silver Recovery for Photo Lab
Durapost Treated Timber	Curt Fisher	Jan 2007	Haz. Waste Concerns, ADEQ contacted
Daisy Outdoor Products	Paul Carter	Sept 2007	Ind User Survey
Strateline Ind	Mark Wood	Nov 2007	Ind User Survey, Permit Application
BMW of NWA	Jim Teeter	Dec 2007	Car wash discharging to ground
BMW of NWA	Jim Teeter	June 2008	Car wash discharge, ADEQ contacted

Several large industries have also been profiled prior to 2004 including FM Corp, Guardian Glass, HAZ-M.E.R.T., Roark Group, Stribling Packaging, and Triple-T Foods. In the future, I plan on tracking meetings with small Industrial Users and surveys sent to these users. I also plan on tracking P2 type improvements made.

However, I think a distinction should be made between “industrial users” and “ANY non-domestic user”. Substituting the words “industrial user” with “ANY non-domestic user” widens the playing field well beyond what this office has the manpower to process. This doesn’t mean that the City has ignored non-industrial users. The City has a successful FOG program that makes over 200 site visits to restaurants on an annual basis. This office also responds to anything unusual found in sewer lines or lift stations by our inspectors in the field.

6. ADEQ Finding

OK City must notify significant industrial users of provisions in 40 CFR 403.8(f)(2)(iii). City must notify facilities on ADEQ’s list of haz. waste generators as well as potential small quantity generators of hazardous waste disposal requirements and of the detrimental effects of hazardous waste on the POTW (see 40 CFR 403.12(p)).

City of Rogers Response

Hazardous waste and RCRA requirements are gone over during each annual inspection of the permitted industries. Small industry hazardous waste outreach in Rogers has focused on dental clinics and photo processors. The previous coordinator did not always log phone conversions or informal meetings. I believe a lot more outreach was going on than the paper files indicate. As stated earlier, I plan on doing a better job logging communications with small industries. An essential part of this will be going over hazardous waste disposal requirements.

Recommended Actions For Improved Implementation

✓ 1. ADEQ Finding

Include specific questions regarding chemical handling procedures in your IU inspection forms.

City of Rogers Response

This was a recommendation during the last audit, and the previous coordinator pledged to incorporate this into the IU inspection forms. I found no record of this change. I’ve added a question about chemical handling/safety to the forms for the four inspections already carried out this year. I’ve also made changes to the generic inspection form and will make it a part of all future inspections.

✓ 2. ADEQ Finding

Increase the accuracy of IU manufacturing process descriptions.

City of Rogers Response

This was addressed under requirement #3. In addition, I will begin reviewing, revising and improving the fact sheets.

3. ADEQ Finding

Add new measures to the P2 program including energy savings, water conservation and annual cost savings. Also direct City IUs to P2 websites.

City of Rogers Response

I recently attended the eight hour P2 Roundtable prior to the 24th annual Region 6 Pretreatment Association Workshop. I think I was the only pretreatment coordinator in attendance. It was very informative and the knowledge gained will improve my pollution prevention outreach efforts. I would like to move toward using a spreadsheet developed by Martina Gehrke, an environmental economist with A Nurtured World. The spreadsheet emphasizes using EPA grant report units and NPPR National Database units. It also emphasizes comparability and consistency. A Nurtured World is working closely with The Zero Waste Network.

4. ADEQ Finding

Pharmaceutical outreach

City of Rogers Response

Nancy Busen of Bentonville spearheaded a countywide effort to educate citizens about the harmful effects of flushing pharmaceuticals to the sewer system. The City of Rogers has had a representative attend all the pharm waste meetings that lead up to the pharmaceutical PyroMed program. I believe that over 700 pounds of meds have been collected and incinerated with this program. In the future, it would be beneficial if more than one city had a permanent collection location as does Bella Vista. This office will promote and publicize the Benton County program and continue to stay abreast of the latest pharm waste findings.

I'd also like to mention that in the 2004 USGS study of pharm and ORCs in North Arkansas only two constituents were measured above lab reporting levels in samples collected downstream of the City's POTW. AHTN was measured at 0.50 ppb, Phenol was measured at 0.58 ppb and the 20 other compounds detected were flagged as estimated – detected but not reportable. Many of those estimated were ORCs which may be the product of stormwater runoff.

Another issue related to pharm waste is the expense to conduct a full scan of a POTW's influent, sludge, and effluent. USGS charges approximately \$5000 for one complete test. Guidance from the EPA on which constituents to focus on would be helpful. Also some sort of water quality criteria values need to be provided.

Required Program Modifications

ADEQ Finding

The City's Pretreatment Program must be modified to include Streamlining Revisions to 40 CFR 403 before the next NDPES permit renewal.

City of Rogers Response

This office plans on modifying the program and related city ordinance before the next NDPES permit renewal in February of 2011.

OK

ADEQ Finding

MAHLs and local limits must be reanalyzed once the new WWTP upgrades are completed and the WWTP has reached a steady state of operation.

City of Rogers Response

This office plans on recalculating the MAHLs and local limits once the upgraded WWTP has reached a steady state of operation.

Recommended Program Modifications

OK

ADEQ Finding

Revise the Pretreatment Ordinance to include a specific prohibition against discharge of any pharmaceuticals into the City's sewer system.

City of Rogers Response

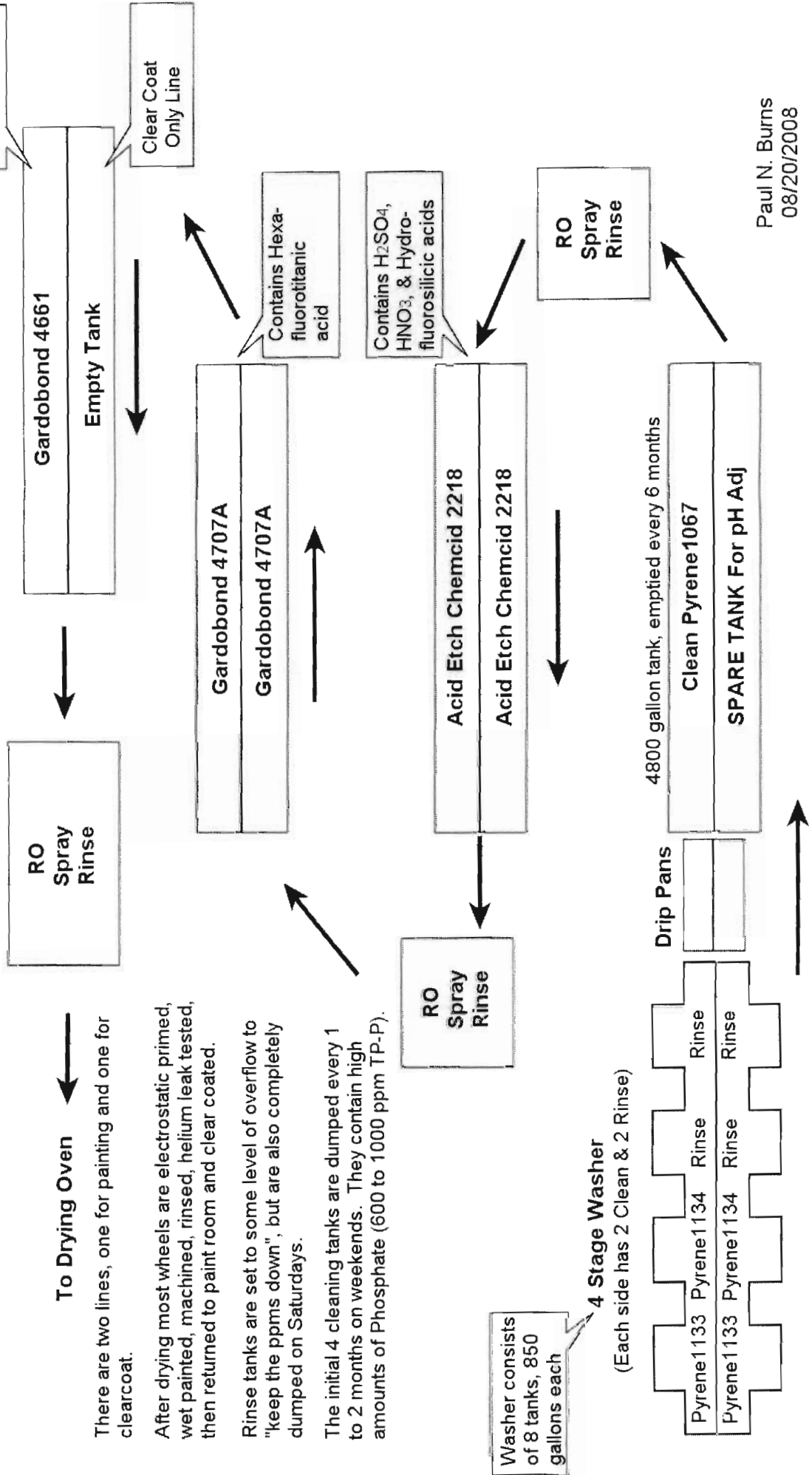
This office will seriously consider making the revision mentioned above.

Errors found in Pretreatment Audit Checklist

So noted

1. Page 7 states that the new SIU Strateline was simply a name change from Fiber Tech. Actually Strateline is a brand new corporation consisting of former members of Fiber Tech. The products produced are virtually the same though.
2. The Preformed Line site visit comments state that all regulated wastewater is being sent through pretreatment. Actually the main 4000 gallon rinse tank, which is dumped every other work day, goes straight to the monitoring location with no pretreatment.
3. The Superior site visit comments state that the post casting cooling tank make-up water is R/O water. I was told that it is R/O reject water and flows at a rate of 3 gallons/minute. Also, another comment states that the R/O backflush (with acid and caustic) in the paint room is a possible dilution stream. The more likely dilution stream is from that the R/O systems must use city water to flush the membrane filters on a daily basis. The volume of this "reject" water is unknown but it may be thousands of gallons per day. The acid and caustic backflushes are only carried out once a month.
4. The Kennametal site visit comments state that there is a series of cleaning tanks that include an acid etch bath followed by a citric acid (5%) bath. The acid etch bath is the citric acid bath – one bath too many was listed.

Superior Industries, Rogers, AR Paint Room Layout



To Drying Oven
There are two lines, one for painting and one for clearcoat.

After drying most wheels are electrostatic primed, wet painted, machined, rinsed, helium leak tested, then returned to paint room and clear coated.

Rinse tanks are set to some level of overflow to "keep the ppm's down", but are also completely dumped on Saturdays.

The initial 4 cleaning tanks are dumped every 1 to 2 months on weekends. They contain high amounts of Phosphate (600 to 1000 ppm TP-P).

Washer consists of 8 tanks, 850 gallons each

4 Stage Washer
(Each side has 2 Clean & 2 Rinse)

Pyrene1133 Pyrene1134 Rinse
Pyrene1133 Pyrene1134 Rinse

Drip Pans

Clean Pyrene1067
4800 gallon tank, emptied every 6 months
SPARE TANK For pH Adj

Paul N. Burns
08/20/2008

PREFORMED LINE PRODUCTS

Wire Drawing Area

